ATTACHMENT NO. 1

SPLIT ROCK LIGHTHOUSE STATE PARK CAMPGROUND EXPANSION PROJECT

WRITTEN COMMENTS RECEIVED DURING EAW PUBLIC REVIEW AND COMMENT PERIOD

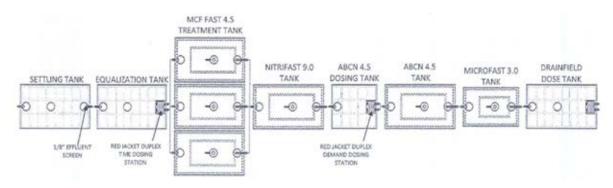
DECEMBER 26, 2011 – JANUARY 25, 2012

Comment Letter No. 1 >>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>	
From:	Ballavance, Brett (MPCA)
Sent:	Thursday, December 29, 2011 11:19 AM
To:	Wieland, Ronald (DNR); Sobania, Dave B (DNR)
Attachments:	7081 0080 Performance Criteria.pdf image002.png
Subject: [PCA Comment]	

Hello Ron. Just thought I'd send another comment on the Split Rock project related to the wastewater aspect of things.. I'm just trying to help a sister agency out in terms of bringing out the potential issues to help move things along. The campground expansion at Split Looks like a great project. I copied Dave Sobania on this email yet I'm not sure how involved he would get in something like this. Since I'm going to mention a technical issue related to wastewater treatment I thought it would be good to include Dave on this. Feel free to give me a call on this issue if you want but I attached a copy of a relatively new rule (2008) that applies to soil-based wastewater systems with flows between 5,000 and 10,000 gpd. Since the EAW mentions that the flow for the campground part might be in that range, I thought I would be important to see this rule. Perhaps I sent this rule previously though. I do see the text in the EAW that says the permit issues will be worked out later with Lake County or the MPCA. That sounds fine but I'm sure people would like to know up front of any potential bigger deal issues so that is what I'm up to here.

The issue I want to mention up front here has to do with our requirement to treat and remove the nitrogen in the wastewater down to a certain level. The EAW mentions that the project would likely use mound systems to dispose of the wastewater. What I'm trying to do here is just not surprise people down the road with what could potentially be a big deal in terms of expense and operational issues for the campground. I don't make the rules around here but this nitrogen rule is a big deal and if it applies to this campground it would mean that a wastewater treatment facility capable of tertiary treatment of nitrogen would be required up front of the mounds. Just to give you a visual example of this I included the flow diagram below for a recent school wastewater system that was constructed north of Duluth that had to comply with this new rule as well. They utilized at-grade mounds to dispose of the wastewater but up front of those atgrades they had to install a fairly complex wastewater system to remove the nitrogen. The issue here is protection of the drinking water supplies and all in terms of nitrate-nitrogen impacts. The nitrogen removal system below cost in the neighborhood of \$400,000 to construct. I'm sure that is the kind of thing that could freak someone out down the road here so I thought I would put this on the table now. In addition, the operational expense of a wastewater system with nitrogen removal is also an issue to be aware of. Perhaps I'm missing something here and this is not an issue for the campground but maybe we should continue to discuss things. Email or give me a call if you want to chat about this.

Brett A. Ballavance, P.E.; Engineer Senior; Municipal Division - Duluth Office (218) 302 -6619 - office (218) 340 -1039 - cell (218) 723 -4727 - fax email: brett.ballavance@state.mn.us website: <u>www.pca.state.mn.us</u>



REVISOR

7081.0080 PERFORMANCE AND COMPLIANCE CRITERIA.

Subpart 1. General. New construction, replacement, or existing MSTS designed under this chapter are considered conforming if they meet the requirements of this part. Existing MSTS constructed before February 4, 2008, are considered conforming if they meet the requirements of this part, except for subpart 4, items D and E.

Subp. 2. Treatment required. All sewage discharged from a dwelling or other establishment not served by a system issued a permit containing effluent and discharge limits or specific monitoring requirements by the agency must be treated according to local ordinances that comply with this chapter, chapter 7082, and Minnesota Statutes, section 115.55.

Subp. 3. Public health and safety; imminent threat.

A. To be in compliance, all MSTS must:

(1) have treatment processes and devices that do not allow sewage or sewage effluent contact with humans, insects, or vermin;

(2) disperse sewage effluent into soil or sand below final grade, with the effluent remaining below final grade;

(3) not discharge to drainage tile, the ground surface, or surface water or back up sewage into dwellings or other establishments;

(4) treat and disperse sewage effluent in a safe manner, including protection from physical injury and harm; and

(5) not have received hazardous material.

B. MSTS must be deemed an imminent threat to public health or safety for noncompliance with item A and any other condition that poses an imminent threat as determined by a qualified employee MSTS inspector or licensed MSTS inspection business.

Subp. 4. Groundwater protection. To be in compliance, all MSTS must:

A. meet the requirements of part 7080.1500, subpart 4, item D;

B. not be seepage pits, cesspools, drywells, leaching pits, sewage tanks, and treatment vessels that observably leak below the designated operating depth;

C. not allow viable fecal organisms to contaminate underground waters or zones of seasonal saturation;

D. employ nitrogen reduction processes that reduce nitrogen contribution to groundwater as determined in subitem (1) or (2):

(1) if the discharge from an MSTS will impact water quality of an aquifer, as defined in part 4725.0100, subpart 21, the effluent from an MSTS, in combination with the effective recharge to the groundwater, must not exceed a concentration of total nitrogen greater than 10 mg/l at the property boundary or nearest receptor, whichever is closest; and

(2) if the discharge from an MSTS will not impact water quality of an aquifer, as defined in part 4725.0100, subpart 21, best management practices developed by the commissioner to mitigate water quality impacts to groundwater must be employed; and

E. not exceed a groundwater discharge of phosphorus to a surface water that exceeds the phosphorus standard to the receiving water.

Subp. 5. Other conformance. To be in compliance, MSTS must meet the requirements of items A and B.

A. All methods and devices used to treat and disperse sewage must be designed to conform to all applicable federal, state, and local regulations.

B. Systems no longer in use must be abandoned according to part 7080.2500.

Subp. 6. System operation. To be in compliance, an MSTS must meet performance standards and be operated and managed according to its operating permit and management plan, as described in part 7081.0290. To be in compliance, an MSTS designed before February 4, 2008, must be operated according to applicable requirements of part 7080.2450.

Subp. 7. Compliance criteria for systems receiving replacement components. Components of existing MSTS that cause noncompliance must be repaired or replaced. The repaired or replacement components must meet technical standards and criteria in parts 7081.0110 to 7081.0280. The remaining components of the existing system must comply with subparts 2 to 5, including subpart 4, item D, if constructed after February 4, 2008.

Subp. 8. Upgrade requirements.

A. MSTS in compliance with this part shall be issued a certificate of compliance. Systems found not in compliance shall be issued a notice of noncompliance.

B. MSTS issued a notice of noncompliance based on criteria in subpart 3 shall be repaired or replaced within ten months or as directed by Minnesota Statutes, chapter 145A, whichever is most restrictive.

C. MSTS issued a notice of noncompliance based on criteria in subpart 4 or 5 shall be repaired or replaced according to local ordinance requirements.

D. Systems issued a notice of noncompliance based on criteria in subpart 6 must immediately be maintained, monitored, or managed according to the operating permit.

Statutory Authority: *MS s 115.03; 115.55* **History:** *32 SR 1400; 35 SR 1353* **Posted:** *March 11, 2011*

From:	David Stanton
To:	Review, Environmental (DNR)
Subject:	EAW for Split Rock
Date:	Thursday, December 29, 2011 3:12:46 PM

Any time the environment can be further protected I support the effort. Adding up to 77 acres to the already wonderful park is definitely in the best interest of the state, the country, and most importantly, the environment. You have my strong support.

David Stanton 2441 Pleasant View Drive New Brighton, MN 55112-5043

From:	Ted Chura
To:	Review, Environmental (DNR)
Subject:	Expansion of Split Rock Lighthouse State Park campground
Date:	Thursday, December 29, 2011 3:35:42 PM

It's good news to hear about this expansion because more campground space is needed along the North Shore, and the Split Rock location would be ideal. The private campgrounds cannot hold a candle to the State's well designed campgrounds. Wish this was done a few years ago when we sponsored a Roadtrek Rally along the North Shore. Hope all goes well.

Ted Chura 570 Marshall St. 570 Marshall St. Duluth, MN 55803-1981

Comment Letter No. 4 >>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>	
From:	Pamela Freeman
To:	Review, Environmental (DNR)
Subject:	expansion of Split Rock lighthouse campsites
Date:	Thursday, December 29, 2011 9:21:14 PM

I have not seen the actual plans, so am not entirely sure of the placement of roads and campsites within this park.

I have camped in this park numerous times, and also visited the park on a day visit, day hiking basis as well.

I am somewhat concerned, as one of the great aspects of this park is it's feel of being wilderness once you get past the campsites. The hiking trails are sometimes not easy, and the views on the lake and within the woods are a treasure.

I am hoping that the expansion will not be deleterious to these aspects of this park.

I know full well that there are more people that want to camp there than it can hold now. But I think this park will always be in demand, and no increase in camping sites is going to relieve that. We enjoy the car in and hike in sites particularly, and no longer car camp as it is too noisy and people want to play radios and be loud. The car in sites and hiking in sites allow us to enjoy the park and camp, but get away from the crowds.

Please take this into consideration when doing this planning and constructing. This is a beautiful park BECAUSE it is big and does not have roads and easy access everywhere. This is part of its beauty. If it becomes too crowded, it will no longer be a place I feel welcome so much. Already popular parks such as Gooseberry are too populated for those of us who go to the parks to "get away" from people and cars and the like. Please do not ruin this by expanding in a way that takes that away from Split Rock.

Thank you, Pamela Freeman Anoka, MN

From:	AuldBear@aol.com
To:	Review, Environmental (DNR)
Subject:	Split Rock EAW
Date:	Saturday, December 31, 2011 9:50:22 AM

You all need to understand, among other things, that most of us are scornful of any site that charges a large fee and is not linked to other such sites. If Split Rock, fee picnic laybys and national forest facilities all came under one fee or card, THEN we would care. I do not go to Split Rocj because the state and DNR have not worked out an agreement with the County parks and the USFS, Park service, etc. for ONE MINNESOTA WILDERNESS FEE THAT WOULD LET ALL OF US USE ALL OF THE FACILITIES IN THE STATE. It's pathetic that you maintain your little fiefdoms when your users see a much larger picture.

Dyke Williams 3725 Parkway Deephaven, MN 55391

Comment Letter No. 6 >>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>		
From:	Mike G. Holznagel	
To	Review Environmental (DNR)	

To:	Review, Environmental (DNR)
Subject:	splitrockeaw
Date:	Tuesday, January 03, 2012 9:01:19 AM

Adding additional sites would be good,, park is always full !

Mike Holznagel Gorham Oien Mechanical 320-679-6643 direct line phone 320-679-1619 company fax

Wally Heise
Review, Environmental (DNR)
Split Rock EAW
Monday, January 02, 2012 7:06:55 PM

Comments about state park expansion - As a private campground owner I have no problem with state parks adding sites and expanding to meet the need of their customers, but I have one main concern / complaint - Please start charging a competitive price for your campsites.

As a private campground, I do not get state tax dollars to pay my expenses or to do improvements, and at the same time a percentage of my taxes help subsidize the operational budget of all state parks. So I am forced to charge more for my services in order to stay in business and pay my taxes to help support my competition. Please charge more for your services (as I am forced to do) to decrease the amount of tax dollars needed to operate the parks. The state should not be in the business of competing with private businesses!

Sincerely,

Wally Heise South Isle Family Campground LLC 39002 Highway 47 Isle, Mn. 56342 320-676-8538 www.southislecampground.com

From:	John Lundy
To:	Review, Environmental (DNR)
Subject:	Split Rock EAW
Date:	Tuesday, January 03, 2012 9:51:58 AM

For admittedly selfish reasons, I'm opposed to adding an RV campground to Split Rock. I would like to see Split Rock remain relatively pristine, and I think these plans would significantly uglify the park. (I don't think "uglify" is a word, but it should be.) If money is available, I think it should be spent on upkeep of what we already have in our great state park system.

If anything is added to Split Rock, I would suggest doubling the number of cart-in sites.

John Lundy 5522 W. Eighth St. Duluth, MN 55807

Comment Letter No. 9 >>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>>	
From:	Jean Edstrom
To:	Review, Environmental (DNR)
Subject:	Split Rock EAW
Date	Tuesday, January 03, 2012 11:34:31AM

Sounds like a wonderful project.

Jon Peters 34524 Lanesboro Ct North Branch, Mn 55056

From:	Dana Simonson
To:	Review, Environmental (DNR)
Subject:	Split Rock EAW
Date:	Tuesday, January 03, 2012 2:59:38 PM

It appears from the EAW that all sites will be electric. If this is correct, great! If not, please consider making all sites electric capable and potentially using a technical solution to allow enabling the electric service on a per rental basis if maintenance of the current rate differential is desired. Electric sites at current campgrounds in the area are difficult to reserve.

I do not need to be added to the mailing list. Thanks

-Dana Simonson

From:	Scott Olson
To:	Review, Environmental (DNR)
Cc:	seolson@frontiernet.net
Subject:	splitrock eaw
Date:	Tuesday, January 03, 2012 3:43:23 PM

Hello, I'm very disappointed in the Split Rock expansion a HUGE part of the draw to the park is the quietness of no motorized vehicles. Will they at least keep the cart in sites intact were they are and separated from the big clunky RVs?

Although the visitor center is great the expansion of Gooseberry Falls was too extreme as well. Very disappointed Minnesota resident longtime camper

Scott L. Olson, Sr. 18821 English Ave. Farmington, MN.55024

From:	chri1215@umn.edu
To:	Review, Environmental (DNR)
Subject:	Split Rock
Date:	Friday, January 06, 2012 3:08:29 PM

Hello, My Name is Daryn Christenson, I am a 27 year old from Minneapolis and I have been hiking the North Superior Trail for the last 3 years and camping in MN for the last 8 years. I just want to let you know how extremely disappointed I am in with the plans for "progress" in the Split Rock Lighthouse State Park.

I don't really understand why we would want to do something like this. What is the point? Are we trying to attract more people to the nature world--the wilderness by destroying it, cause that is essentially what you are doing. People who look like the comforts of electricity, homes (mobile homes) and the like should jsut stay in the city, it appears obvious to me. Since what they like is civilization. Why are you ruining one of the few places i can find in this state to get away from the chains of civilization and the oppression that plagues over my soul due to the bullshit modernization I and many of my friends have had to deal with in the name of "progress." This is why I am urging you to keep the concrete mixing truck and the electricians out of this park! They're aim is only to make money and they care little for the natural world that sustains! Please..PLEASE keep civilization out of our parks, their is plenty of room for that disgusting horrid shit in the city. Leave the Natural world Natural! I beg you! Or pretty soon there will be no where where i can go to escape the sounds of machines and enjoy the quiet hum of the breeze blowing through the trees, the birds chirping, the gentle flow of the creek. I work all year for the opportunity to leave for a few weekends a year and escape the sound cars, and stereos and the bullshit that Americans call culture!

Sincerely,

A very concerned lover of Nature!

I apologize for they language of this e-mail, its just that i am very pissed off by this foul news!

From:	Dyanne Ross-Hanson
To:	Review, Environmental (DNR)
Subject:	Split Rock EAW
Date:	Saturday, January 07, 2012 7:00:14 AM
Importance:	High

Hello, I am a loyal visitor to the Split Rock Lighthouse State Park. Our family has chosen the park for many years because of its stunning natural beauty along with its tranquility.

I STRONGLY OBJECT to any expansion of the camping/lodging facilities in the Split Rock Lighthouse Park. It would violate the very essence of this natural treasure! Dyanne

Dyanne Ross-Hanson CLU, CFP, ChFC President Exit Planning Strategies, LLC Directing The Process



Currell Centre 7616 Currell Blvd., Ste. 200 Woodbury, MN 55125 p. 651 426-0848 f. 651 925-0050 www.exitplanstrategies.com

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From:	Jim Linscheid
To:	*Review, Environmental (DNR)
Subject:	Split Rock Campground EAW comments
Date:	Saturday, January 21, 2012 2:34:05 PM

Dear Mr. Wieland:

Thank you for taking public comments regarding the expansion of camping opportunities at Split Rock State Park and for posting, on line, the related EAW.

For months, if not years, while we drove beside and eventually over the new Hwy 61 bridge over the intermittent creek in the park, it was very difficult to understand just why a "million dollar" bridge was required for a small intermittent creek. We did not then know of the Park's plans. The EAW very much revealed why! Thanks. You are to be commended for NOT installing another separate access from Hwy 61. Thank you for that!

Some concerns persist regarding the project: Waste water treatment:77 sites and four cabins when fully occupied will produce a CONSIDERABLE quantity of waste water.... You have noted such... You are being REALLY encouraged to OVER BUILD your waste water treatment facilities! We know just how difficult it is to have the 'ground' absorb waste water on much of the shore. The more efficiently and completely the waste water is treated the less likely that it will or may become a surface or subsurface contaminant.

In 1963 we tent camped across Europe for much of the summer. In many of the showers there one could use all of the cold water that one wished to. However, there was a coin operated meter which controlled the amount of time that one could use hot water!! We would often lather up a time or two using cold water and then luxuriate in a brief hot water rinse! Might you wish to consider something like that to conserve both water and what ever energy source you will be using to heat water for the showers? Yes, yes, I fully realize that today's pampered Americans will howl over such a situation! However, protecting the north shore environment should give reason to the DNR to turn a 'deaf ear' to such howls... They will get used to it.... Just thoughts. Meters will be much more effective than any signage, etc.! Presumably you will be using low flow shower heads.... Yes?

Not too many years ago two young fellows from the Twin Cities area came up to the north shore in the spring. They were dressed TOTALLY inappropriately for the weather and on ground (snow) conditions. One of them perished of hypothermia as a result of their getting confused in the woods and not being properly prepared. It is fully realized that 'one can not legislate out stupid'. However, might it be appropriate to very carefully, through quality signage, warn hikers of potential cold and wet conditions that can occur at nearly any month on the north shore? Just thoughts from one who has lived there since 1961.

The EAW mentions concerns of vegetation degradation by snow shoe hares. Frankly, while I'm not familiar with the immediate area of the proposed campground, I do know that since about the early 1980, for what ever reasons, the snow shoe hair know that since about the early 1980, for what ever reasons, the snow shoe hair population on the north shore is VERY low. Granted that can suddenly change... However it has not for some time... Just observation from an outdoors-man.

Lastly, and quite importantly, in item 8 p. 6 you mention a list of needed permits for the campground expansion. Notable by its absence, is a Conditional Use Permit from Lake County. If a similar project was proposed by a private individual a CUP from LC would be required. Was this an over site? Is one not needed? If not, why not? In item 27 p. 22 you X yes, but yet require no CUP from LC...???

Please do be as respectful as possible, during both construction and operation of the campground, of any nearby private property!

Again, thank you so much for the opportunity to comment!! Good Luck with the project! Most sincerely,

Jim Linscheid 5850 Lax Lake Road Silver Bay, MN 55614-3633

From:	Carl Sannes
To:	*Review, Environmental (DNR)
Subject:	Split Rock EAW Comments - 1/25/2011
Date:	Wednesday, January 25, 2012 3:53:33 PM

I respectfully submit the following comments regarding the "Environmental Assessment Worksheet" (EAW) for the Split Rock Lighthouse State Park Campground Expansion:

- 1. As an adjacent land owner I am very disappointed that I was not included on the EAW distribution list and only learned of the EAW comment period by word of mouth while on vacation in early January. I returned from my out-of-state vacation last week and have not had time to review the documents until this week. Consequently, I request a time extension to allow for a full review of the EAW, including a site visit to better understand the potential project impacts.
- 2. To minimize long term environmental and aesthetic impacts all utilities should be located underground throughout the project site. The installation should occur during the initial construction period to avoid additional or elongated construction impacts.
- 3. Figure 5 appears to show the access road between Hwy 61 and the first loop (likely the proposed dump station) to be on the hillside adjacent to the creek. During a project presentation a few years ago the project representatives indicated roads would not be routed along hillsides in order to avoid cut and fill construction and to avoid near and long term erosion and tree loss. This and other sections of roads should be reviewed carefully to avoid hillside construction.
- 4. Baseline noise studies should be conducted to assure that state and local standards are not exceeded during or after construction.
- 5. Item 12, Pages 12 &13 of 24: The wetland mitigation portion of this section is incomplete. The plan needs further development since only 2.5 mitigation acres are potentially available from adjacent counties whereas 23 acres may be needed.
- 6. Items 23 & 24, Page 20 of 24: These articles do not address the potential for odors or emissions from the sanitary facilities or dump station. The emissions from any potential new sources should be addressed.
- 7. The potential for increased sedimentation in the Unnamed Creek (S-031) from surface run off should be addressed from both a near and long term perspective.
- 8. It appears the EAW should address whether the Unnamed Creek is a trout stream. If so, the implications should be addressed.
- 9. The potential environmental impact from camper cabins seems to be an unfortunate part of this proposed project scope since there are so many seasonal and year round resort options already located along the North Shore. It seems to be an unnecessary part of the proposed project scope. As nice as they are, the inclusion of the proposed camper cabins in the project scope should be reconsidered.
- 10. The figures provided do not show the proposed sanitary station, sanitary dump station, mound system or well location. The figures should be revised to clarify the proposed locations and size.
- 11. The boring locations should be superimposed on the proposed site development figure.

Please include me on future distribution lists and let me know if you have any questions or comments. Thanks,

Carl A Sannes Jr 143 W Pleasant Lake Rd St Paul, MN 55127 H: 651-484-4916; C: 651-308-7686



Split Rock Lighthouse State Park Campground Expansion Project

RE: Public comments to Environmental Assessment Worksheet

January 13, 2012

The following observations and comments are based, in part, on my experience and observations as the resident historic site manager of Split Rock Lighthouse Historic Site for the Minnesota Historical Society. I have held this position since 1982.

The North Shore, and Split Rock Lighthouse...both the state park and the historic site ... will continue to draw large numbers of visitors and campers. A vehicular campground in the state park will be very popular from May through October. Use patterns will likely mimic the use enjoyed by the campground at Gooseberry Falls State Park. Below are some specific comments based on the open house for the campground project held in the Split Rock Lighthouse History Center on September 29, 2009, on the EAW for the campground project, and from walking the project site and the surrounding state and nonstate lands.

It was unclear at the campground open house if the campground project consultants adequately examined other potential areas nearby in the park. An 80 to 100-acre area just to the northeast of Split Rock Creek (NW/NW of Section 6 and the SW/SW of Section 32) offer favorable drainage, few wetland issues, a viewshed of Day Hill and Lake Superior and plenty of sunshine, always a desirable commodity when camping. Distance from the new Hwy. 61 underpass would be slightly further, but grades for the campground road are acceptable.

The project area, as defined in the EAW and as flagged on the ground, is in a rocky and remote area of the park. This location will result in campsites with no view of Lake Superior, a higher impact on the resource, and difficult and costly construction. Vegetation in the project area is primarily mature white birch with alder and some balsam fir in the low and wet areas, and a few mature white spruce. Most of the birch will decline in the next few years, either from construction activity or naturally, leaving very little significant tree cover. The few large spruce appear to be in the easement of planned roadways or campsite areas, which is unfortunate.

The project location is immediately adjacent to two private land holdings. One is a seasonal cabin (Sannes) directly between the planned campground and Highway 61. The other is on a ridge immediately overlooking the project area. Within the last few years the landowner (Domholt) built an access road and a well, and this prominent overlook will likely feature a home or cabin overlooking the campground in the next few years. The landowner also hunts deer on his 40-acre parcel.

P. 002

Cultural resources and man-made features in the project area are few. One major feature not mentioned is a railroad grade dating from the logging operation at the Split Rock River between 1899 and 1906. This grade is known locally as the "telephone grade" as the first telephone lines strung up the North Shore to Beaver Bay from London Crossing apparently followed this grade. The grade is also marked on a 1922 Lake County road map as an early road to Beaver Bay prior to the completion of Highway 61 between Silver Creek Cliff and Beaver Bay in 1924. Last year two wells were drilled for the new campground within 10-20 feet of this grade. I would suggest that this railroad grade be preserved by avoiding disturbance during and after construction. The grade would make a desirable hiking trail that would tie in with existing trails in the state park at a future time.

On Figure 2 that accompanied the EAW report two creeks near or in the project area are misnamed, or have been intentionally renamed. What shows as Shipwreck Creek (S-032) has been known as Chapin's Creek since at least the 1920's. Chapin built a large cabin near the mouth of this creek around the time that Highway 61 was built in the 1920's. David and Susan Tanner currently own and have restored the old Chapin cabin. Chapin's Creek and Chapin's Curves on Highway 61 got their names from this connection. Also, Unnamed Creek (S-031) was changed from No Name Creek, the name it was given in the 1980's by DNR staff. This comes from a more original name from an earlier map where it was referred to as Anonymous Creek. It seems that, especially in the case of renaming Chapin's Creek to Shipwreck Creek, it is a misguided attempt to rename the stream at the expense of its historic ties and its local identity. Split Rock Creek has held that name since at least 1900.

Lastly, the opening of the new campground will no doubt have an impact on Split Rock Lighthouse Historic Site use patterns, as well as those of the state park. Pull-through parking in the historic site parking lot is currently inadequate for the busiest days of mid-summer and during fall color weekends. With added RV and trailer use in the state park parking requirements will have to be monitored and reassessed and possibility additional parking space added. It is anticipated that the campground use will slightly increase visitation to the lighthouse but it is anticipated that the current interpretive program can adjust to that. Accessibility to the observation deck (near the lighthouse) from the visitor center is currently under review by the Minnesota Historical Society and improvements are anticipated with improvements to access by the time that the campground is opened to the public. The campground will require more traffic to stop and use the state park contact station. No doubt DNR has taken this into consideration with any remodeling or future planning for the roadway and for the contact station.

Thank you for the opportunity to comment.

Lee Radzak 12

Historic Site Manager Split Rock Lighthouse Minnesota Historical Society (218) 226-6372 lee.radzak@mnhs.org

Ms. Carol RaPenrson - 14 800 London Rd Ronald Wieland EAW Theyert Mang. Enviromental Policy & Review Unit Div of Ecological & Water Resources DNR 400 Lafayette Road St Paul Mr 55155-4025 025 1-6-12 Dear Mr. Wieland, all af us who have life long poots to the wonders of Lake Superior and the North Share are excited about the Split Rock extension Plan! I do hope that at least one of the four cabins will be wheelchair accenable. Thank you, Caral Pearson

To: Minnesota Department of Natural Resources

January 13, 2012

From: Linda Ross Sellner

402 Arrowhead Road Duluth, MN 55803

218-728-1134

Please consider my comments/input for the Split Rock State Park Campground Expansion.

I wish to address the incompleteness of the Environmental Worksheet, potential impacts that warrant further investigation and therefore, the need for an EIS.

I find it extremely disturbing that access to the site of the new campground has already been facilitated by construction adjustments to the MN-DOT Hwy 61 Trunk project, *in anticipation* of this expansion. How can public input be allowed to influence decisions when such large-scale highway reconstruction has already paved the way for bringing the purposed campground expansion to fruition?

I have a degree in Geology/ Biology (1996-UMD) and am certified in GIS (2009-UWS).

- 1. Although briefly mentioned in just one paragraph at the end of the Worksheet, my biggest concern is in the cumulative erosional effect of recent logging to the north and west as well as simultaneous logging of 35 acres within the watershed of the un-named creek and the proposed campground site. This alteration of land cover would be severe enough to warrant concern for rates of erosion and sedimentation of the creek water (emptying to Lake Superior) associated with harvesting of older-growth forested sites, but this is to occur in areas of general slope >12 degrees! Over 60 acres of new land-cover removal in addition to adjacent, recent logging will increase overland flow of stormwater, gouge gullies to the creeks and overwhelm stormwater catch basins designed for one inch of rainfall in the project site. These rock Highland areas have low water infiltration rates and the clay soils increase water flow velocity on steep slopes. The area needs to be evaluated in a cumulative way for surface water runoff. This should include the impervious surface creation and impact of the project.
- 2. In keeping with the above concern, how can ANY evaluation of water-flow over land and into proximal water bodies occur without Watershed Delineation? This is a fairly easy procedure in GIS and should be included in the Worksheet since it is referred to so frequently. Manual outlining of a probable watershed on a topographic map is the least we could expect but overlooked here.
- 3. I question the "suitable site available" for the waste treatment mound system. The author has acknowledged the "clayey substrates" and "shallow bedrock" producing "very limited infiltration

rates" yet some discontinuity in substrate, or perhaps planned erodible fill has produced a viable site. The parameters of this " site" are not defined and need to be. Failure of a septic system on such steep slopes and in such close proximity to Lake Superior would be unacceptable.

- 4. Split Rock Campground's present lack of electric hook-up campsites seems to be the motivating factor for this expansion. Frequently mentioned throughout the worksheet, electricity to campsites will facilitate RV camper use of the new campground. I find this catering to RV accommodation to be short-sighted for a fleet that will not arrive. RVs use a disproportionally high volume of gasoline for mobility. Fuel prices are sure to increase in the future. The indiscriminate use of gasoline and the resulting hydrocarbon pollutants that contribute to global warming will surely be restricted as the situation becomes ever more severe in the years to come. Although there is mention made of co-existing tent accommodation, does two months of maximum campground registration at the existing campground warrant 77 new sites? And why is the campground full in July and August? Because the warm weather of summer and the natural, forested and undeveloped surroundings draw people that want to "get back to nature". Removing vast areas of natural cover, putting up electrical wires on poles for eternally lighted structures will detract from the appeal of the North Shore!
- 5. Loss of wetlands in this locale, without even mitigation *in the watershed*, will no doubt be granted by permit by the Corps of Engineers, but should never be allowed. The benefits of wetlands are well established and yet in their natural setting, continue to be removed. How can this flagrant abuse of wetland functionality for clean water and the capture of sediment again be disregarded under proposed campsite conditions of 60% steep slope and minimal groundwater flow over shallow rock substrate? Wetlands provide the only means to slow water flow during precipitation events. The four acres of wetland loss, along with 5 acres of impervious surface creation and the loss of mature tree cover due to 35 acres of proximal harvesting would overwhelm any environmental stability! Yes, other sites were removed from consideration because of more numerous wetland conditions, but why does the area of least wetland disturbance justify construction in such a generally high value and scarce wetland environment?
- 6. I wish to comment on Figures 2, 3, 4 and 5. In Figure 2, "Un-named Creek (S-031)" is labeled but not shown. I suspect the label compromises the depiction of the creek, had it been shown in characteristic symbology for an intermittent stream in blue color. This essentially limits determination of creek morphology. Lack of stream depiction occurs in Figure 4 as well. In Figure 3, the Project Area shown is half-way outside the State Park Boundary. Is this an indication of the earlier boundary before land was acquired for campground expansion? If so, please refer to opening statement about pre-determination of said project before public input. In Figure 5, I am confused by the differing texture below the light green shade to indicate slopes >12%. In some areas, the texture looks like elevation lines, yet that is inconsistent. If these are lines of elevation, I would like to be able to see indication of line values so I could determine direction of slope.

Thank-you for your consideration of these comments.

Linder Ross Sellner



STATE HISTORIC PRESERVATION OFFICE

January 5, 2012

Ron Wieland Environmental Review Planner MN Dept. of Natural Resources 500 Lafayette Road St. Paul, MN 55155-4025

RE: EAW - Split Rock Lighthouse State Park Campground Expansion Beaver Bay Township, Lake County SHPO Number: 2012-0753

Dear Mr. Wieland:

Thank you for providing this office with a copy of the Environmental Assessment Worksheet for the above-referenced project.

We understand that a cultural resources survey has been completed for this project and that a report is being prepared for submission. We look forward to reviewing the results of this survey, and will provide comments once we've had the opportunity to review the completed report.

Please feel free to contact me at (651) 259-3455 with any questions or concerns.

Sincerely,

Theson

Kelly Gragg-Johnson

cc: Dave Radford, MnDNR





DEPARTMENT OF THE ARMY ST. PAUL DISTRICT, CORPS OF ENGINEERS 180 FIFTH STREET EAST, SUITE 700 ST. PAUL MN 55101-1678

January 11, 2012

REPLY TO ATTENTION OF Operations Regulatory (2011-05462-LED)

Mr. Ronald Wieland Department of Natural Resources Division of Ecological and Water Resources 500 Lafayette Road St. Paul, Minnesota 55155-4025

Dear Mr. Wieland:

Thank you for the opportunity to comment on the Department of Natural Resources' Environmental Assessment Worksheet (EAW) for a project to expand the Split Rock Lighthouse State Park campground. The project as proposed in the EAW would involve the construction of access roads, 77 additional campsites, four (4) camper cabins, a picnic shelter, a small parking area, several vault toilets, a sanitation building, and an RV dump station/recycling center, within the 179 acre project area. The project site is located in Section 32, T. 55N., R. 8W., Lake County, Minnesota.

According to the EAW, the project would result in impacts to approximately 3 to 4 acres of wetlands. We believe that you may need a Department of the Army permit for this activity. The discharge of dredged or fill material into any water of the United States, including most wetlands and tributaries, is subject of Army Corps of Engineers jurisdiction under Section 404 of the Federal Clean Water Act. Please contact Ms. Leslie Day in our Two Harbors office to schedule a meeting to discuss whether a Department of the Army permit would be required for this project.

Should a Department of the Army permit be required for this project, please be aware that the Corps' evaluation of a Section 404 permit application involves multiple analyses, including (1) evaluating the proposal's impacts in accordance with the National Environmental Policy Act (NEPA) (33 CFR part 325), (2) determining whether the proposal is contrary to the public interest (33 CFR § 320.4), and (3) in the case of a Section 404 permit, determining whether the proposal complies with the Section 404(b)(1) Guidelines (Guidelines) (40 CFR part 230).

Please understand that while the EAW may satisfy the state's environmental review process, additional environmental review (including coordination and/or consultation with other agencies and the public) may be required at the federal level to satisfy National Environmental Policy Act (NEPA) and Section 404 of the Clean Water Act requirements. If your project requires a Section 404 permit application, the Guidelines specifically require that "no discharge of dredged or fill material shall be permitted if there is a practicable alternative to the proposed discharge which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences" (40 CFR § 230.10(a)). Time and money spent on a proposal prior to applying for a Section 404 permit cannot be factored into the Corps' decision whether there is a less damaging practicable alternative to the proposal. General information about the Corps permitting process can be obtained online at <u>http://www.mvp.usace.army.mil/regulatory</u>.

Please be aware that if your project requires a Section 404 permit application, a wetland delineation of the 179 acre project area may be required. Once approved by the Corps, this wetland delineation would need to be used in the design of the project planning phase for the exploration and evaluation of alternatives.

Without detailed project plans that include the location of wetlands and water crossings, we cannot provide specific comments regarding the effects to waters of the U.S. Therefore, we would strongly recommend that the project proposer request a meeting with the Corps to obtain information regarding information that would be necessary for a permit review.

In addition, we noted that Page 23 of the EAW mentioned several minor development/maintenance projects within the park scheduled for the 2012 construction season. Please be aware that should these activities involve the discharge of dredged or fill material (including mechanized land clearing, culvert replacements, etc.) in waters of the United States, a Department of the Army permit would be required prior to the start of work. Please contact Ms. Leslie Day in our Two Harbors office to discuss whether a Department of the Army permit would be required for these projects and arrange for an on-site consultation.

If you have any questions about the Corps' regulation of a particular wetland or activity, please contact Ms. Leslie Day in our Two Harbors office at (218) 834-6630. In any correspondence or inquiries, please refer to the Regulatory number shown above.

Sincerely,

Leslim

Tamara E. Cameron Chief, Regulatory Branch

Copy furnished: Joan Weyandt, BWSR Deb Boyd, Minnesota Department of Natural Resources – Division of Parks and Trails



Minnesota Pollution Control Agency

520 Lafayette Road North | St. Paul, Minnesota 55155-4194 | 651-296-6300 800-657-3864 | 651-282-5332 TTY | www.pca.state.mn.us | Equal Opportunity Employer

January 24, 2012

Mr. Ronald Wieland Environmental Review Planner Minnesota Department of Natural Resources 500 Lafayette Road St. Paul, MN 55155-5595



Re: Split Rock Lighthouse State Park Campground Expansion Environmental Assessment Worksheet

Dear Mr. Wieland:

Thank you for the opportunity to review and comment on the Environmental Assessment Worksheet (EAW) for the Split Rock Lighthouse State Park Campground Expansion project (Project) in Lake County, Minnesota. The Project consists of the expansion of the campground at Split Rock Lighthouse State Park by constructing access roads and adding up to 77 additional campsites and four camper cabins. Minnesota Pollution Control Agency (MPCA) staff has reviewed the EAW and has no comments at this time.

Please be aware that this letter does not constitute approval by the MPCA of any or all elements of the Project for the purpose of pending or future permit action(s) by the MPCA. Ultimately, it is the responsibility of the Project proposer to secure any required permits and to comply with any requisite permit conditions. If you have any questions concerning our review of this EAW, please contact me at 651-757-2508.

Sincerely,

Verren Woman

Karen Kromar Planner Principal Environmental Review Unit Resource Management and Assistance Division

KK:mbo

cc: Craig Affeldt, MPCA, St. Paul Tom Estabrooks, MPCA, Duluth Brett Ballavance, MPCA, Duluth Suzanne Hanson, MPCA, Duluth

ATTACHMENT NO. 2

SPLIT ROCK LIGHTHOUSE STATE PARK CAMPGROUND EXPANSION PROJECT

WRITTEN COMMENTS RECEIVED AFTER EAW PUBLIC REVIEW AND COMMENT PERIOD

From:Kevan HansonTo:*Review, Environmental (DNR)Subject:Split Rock EAWDate:Wednesday, January 25, 2012 9:46:06 PM

I recently learned of the planned expansion to Split Rock Light House Campground.

I have regularly visited the campground since I was 5 years old because it is one of the few remaining places in Minnesota to relax and enjoy nature in a private/tranquil setting. It would be a tragedy to lose the rustic feeling of the existing campground. Please reconsider.

Kevan Hanson

ATTACHMENT NO. 3

SPLIT ROCK LIGHTHOUSE STATE PARK CAMPGROUND EXPANSION PROJECT RECORD OF DECISION

<u>REVISED FIGURE 5.</u> SPLIT ROCK LIGHTHOUSE STATE PARK CAMPGROUND EXPANSION – PROPOSED DEVELOPMENT.

