

# **RECORD OF DECISION**

## **Attachment A**

### **Wright Bog Horticultural Peat Project Environmental Assessment Worksheet**

#### **Public Comments**

**From:** [Demmer, David \(BWSR\)](#)  
**To:** [MN Review, Environmental \(DNR\)](#)  
**Cc:** [Felix-Gerth, Annie \(BWSR\)](#)  
**Subject:** Wright Bog EAW  
**Date:** Tuesday, December 12, 2017 1:32:32 PM

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To whom this may concern:

**Comment A1:** Thank you for the opportunity to comment on the Environmental Assessment Worksheet (EAW) for the Wright Bog Horticultural Peat Project in Carlton County. As the BWSR Wetland Specialist assigned to Carlton County, I submit these comments with the understanding that the applicant intends to submit a joint application to the County for impacts that are within the scope of the Wetland Conservation Act.

In the context of the project in whole, however, I'd like to submit the following comment for consideration:

- 1) **Comment A2:** The EAW describes hydrologic monitoring outcomes from the Black Lake Bog operation. On page 22 the sponsor makes the statement that "ditching is expected to cause a similar effect on water levels at the Wright Bog and adjacent areas". Does the sponsor plan on conducting groundwater monitoring to determine baseline water tables and post restoration groundwater levels at the Wright Bog site?

Feel free to contact me with any questions...

Respectfully,

**David Demmer | Wetland Specialist**  
Minnesota Board of Water and Soil Resources (BWSR)  
394 South Lake Avenue, Room 403  
Duluth, MN, 55802  
C: 218-464-8289  
[Web](#) | [Twitter](#) | [Facebook](#)

**From:** [Kally Goschke](#)  
**To:** [MN Review, Environmental \(DNR\)](#)  
**Subject:** Wright Bog  
**Date:** Friday, December 22, 2017 11:09:20 AM

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**Comment B1:** Please accept this comment on the destruction of Wright Bog

We Need Peat Bogs!!

We need more wetlands and bogs not less. There are fabulous sustainable alternatives to horticulture peatmoss like coconut Coir, so it is not needed.

**Comment B2:** Our general water quality in Minnesota is abysmal and this will further degrade it no matter what precautions they claim they will make.

**Comment B3:** The company should put their money into processing coconut coir, most gardeners have environmental concerns so would not be buying it anyway. So tired of all of the economic destruction in the name of jobs for a quick buck. We live here! DNR Please protect our water quality – or rather lack there of. Please step it up.

Kally Goschke – professional horticulturist  
24725 361st Ave  
Henderson, MN 56044



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800-657-3864 | Use your preferred relay service | [info.pca@state.mn.us](mailto:info.pca@state.mn.us) | Equal Opportunity Employer

January 9, 2018

Bill Johnson  
Planning Director  
Minnesota Department of Natural Resources  
Division of Ecological and Water Resources  
500 Lafayette Road  
St. Paul, MN 55155-4025

Re: Wright Bog Horticultural Peat Project Environmental Assessment Worksheet

**Comment C1:** Thank you for the opportunity to review and comment on the Environmental Assessment Worksheet (EAW) for the Wright Bog Horticultural Peat Project (Project) in Carlton County, Minnesota. The Project consists of 316 acres of horticultural peat extraction. Regarding matters for which the Minnesota Pollution Control Agency (MPCA) has regulatory responsibility or other interests, the MPCA staff has the following comments for your consideration.

**Water Resources (Item 11)**

**Comment C2:** Regarding wetlands, the MPCA reviews temporary loss on a case by case basis and uses the requirements of Minn. R. 7050.0275 subp. 2 to determine if a project will qualify for an exemption from the antidegradation rule. Antidegradation defines temporary impacts as those lasting less than 12 months from the time the water is initially impacted. It is likely that mitigation will be required for the temporary wetland impacts resulting from the Project.

**Comment C3:** We appreciate the opportunity to review this Project. Please provide your specific responses to our comments and notice of decision on the need for an Environmental Impacts Statement. 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 the EAW, please contact me by email at [Karen.kromar@state.mn.us](mailto:Karen.kromar@state.mn.us) or by telephone at 651-757-2508.

Sincerely,

A handwritten signature in black ink that reads 'Karen Kromar'.

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

cc: Dan Card – MPCA St. Paul; Jim Brist – MPCA St. Paul; Patrick Carey – MPCA Duluth

**From:** [Kelly Gragg-Johnson](#)  
**To:** [Johnson, Bill H \(DNR\)](#)  
**Cc:** [Sarah Beimers](#)  
**Subject:** Re: Confirming Receipt of DNR-RGU EAW: Wright Bog Horticultural Peat Project (SHPO #2017-2174)  
**Attachments:**

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Hi Bill –

**Comment D1:** We have received a copy of the Environmental Assessment Worksheet (EAW) for the Wright Bog Horticultural Peat Project in Carlton County (SHPO No. 2017-2174). We have no further comments on the EAW, as you have adequately addressed our comments and recommendations within the public document. The Unanticipated Discoveries Plan (UDP) is good to have and is appropriate for this type of project. A copy of the UDP will be kept with our project file for future reference.

Best Regards,

Kelly

Kelly Gragg-Johnson, Review & Compliance Specialist  
Minnesota Historic Preservation Office | Heritage Preservation Department  
Minnesota Historical Society | 345 Kellogg Blvd W | St. Paul, MN 55102  
tel: 651.259.3455 | e: [kelly.graggjohnson@mnhs.org](mailto:kelly.graggjohnson@mnhs.org)

*FYI: The State Historic Preservation Office research files will be closed to the public Monday, December 25, 2017 through Tuesday, January 2, 2018. Regular office hours will resume on Wednesday, January 3, 2018, 8:30 a.m. to 4:00 p.m. Please check <http://www.mnhs.org/shpo/survey/files.php> for additional information.*