

May 18, 2022

Dan Money, District Administrator
Two Rivers Watershed District
410 South 5th Street, Suite 112
Hallock, MN 56728

RE: Klondike Clean Water Retention Project #11
Kittson and Roseau Counties
SHPO Number: 2022-1437

Dear Dan Money:

Thank you for consulting with our office during the preparation of an Environmental Assessment Worksheet for the above-referenced project.

According to your correspondence, the Two Rivers Watershed District is currently developing the Klondike Clean Water Retention Project #11 that will provide flood control, aquatic habitat, drainage benefits, and water quality improvements in an area covering nearly 12 square miles along the Kittson and Roseau County line. The project is planning for gated water storage of up to 35,250-acre feet from a 191.5 square mile upstream drainage area, and includes 8 miles of diked inlet channel, up to 6 miles of diversion channels, and a 17 mile long dike with an average height of 6 feet.

We have reviewed the following documentation that was included with your April 18, 2022, submission:

- Email from Dan Money dated April 18, 2022, that provides a brief project summary
- Document: *Klondike Clean Water Retention Project #11 (March 10, 2022 Update)* with attached topographic map
- Preliminary cultural resource review from Jason Reichel, Cultural Resource Specialist for the Natural Resources Conservation Service, and Michael Magner, Forestry and Fish & Wildlife Archaeologist for the Minnesota Department of Natural Resources (email dated 2/19/2020).

Based on our preliminary review of this information, it is our opinion that there is a low likelihood for intact archaeological resources being present within the proposed project area. However, it is our understanding that this project will require a federal permit from the U.S. Army Corps of Engineers (USACE) and may impact state lands acquired through US Fish and Wildlife (USFWS) administered programs and therefore will be subject to review under Section 106 of the National Historic Preservation Act. As the project's scope is further defined, additional consultation with the USACE, the USFWS (if applicable), and other consulting parties will be necessary in order to define an appropriate area of potential effects (APE) for the federal undertaking as well as the necessary historic property identification and evaluation efforts required for a federal review.

As noted above, this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency. Be advised that comments and recommendations provided by our office for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.

We look forward to continuing consultation with the Two Rivers Watershed District, the USACE, and other consulting parties as planning for this project proceeds. Please contact me at kelly.graggjohnson@state.mn.us with any questions regarding our review of this project.

Sincerely,

Kelly Gragg-Johnson

Kelly Gragg-Johnson
Environmental Review Program Specialist