

**Two Rivers Watershed District
 Klondike Clean Water Retention Project
 Summary of EAW Comments Received from MN DNR
 2/27/2023**

Comment Heading	Comment Summary	Response
Project Phasing	<p>Add a table - changes to wetland/fen resources for each project phase - FDR benefits - fill impacts</p>	<p>The following language is provided to you in lieu of a table to help describe phasing and potential effects: Phase 1 will provide sought after flood damage reduction and natural resources enhancement benefits, especially during more frequent flood events. Future phases will provide additional flood damage reduction benefits and natural resources enhancement benefits during larger, less frequent flood events due to the increased storage and inlet capacity. Phased construction is planned for the Project, mainly due to the uncertainties with respect to funding. Mitigation is planned to be adequate for all planned phases and will occur in conjunction with Phase 1. Future phases will add benefits with minimal impacts to wetland and fen resources. The Phase 1 footprint includes nearly all the wetland impacts within the Project footprint that could occur in all subsequent phases. In peat areas, the dike footprint of Phase 1 is proposed to be built to the full width and future phases will only add to the dike height. Primary settlement will occur within 30 days of construction and long-term settlement will occur in spite of any additional phases of construction. Future phases allow more hydraulic head within the impoundment due to higher potential pool levels.</p>
Subsurface impacts	<p>add text to address subsurface impacts - map of direction of subsurface flow, current trend of veg quality in adjacent areas - difficult</p>	<p>The DNR and TRWD installed piezometers and collected data, which is available from DNR. DNR staff indicated they could not measure a trend. Discussions were held with the Project Work Team which consisted of TRWD, DNR, MPCA, and others. Additional language was added to the EAW based upon earlier comments from DNR: <i>"The Fen Management Plan team's evaluation and observation of groundwater levels and movements in and near the fen and proposed impoundment area were inconclusive. No directionality or movement of groundwater was measured. However, due to the extremely flat terrain, groundwater movement is presumed to be in a northwesterly direction within the peat subsurface soils. Early embankment designs included intentional sub-surface permeable foundations, to presumably maintain groundwater movement in any direction. However, these designs were tabled for more traditional earth filled embankment as there is no clay cutoff walls as part of the proposed dikes, and the design essentially still allows subsurface movement of groundwater. The Fen Management Plan participants concluded that the benefits of the Project with respect to reduced depth and duration of surface water flooding of the fen was a larger benefit to the fen than the potential for alteration of groundwater movement."</i></p>
Cumulative impacts	<p>plan - mitigation for impact that area unforeseen.</p>	<p>Monitoring and mitigation details will be determined in the permitting process. The TRWD has worked with the DNR on monitoring in the past, and is open to further discussion on this topic. Recent DNR reports indicate changes within the fen have happened in the past 20 to 30 years. It would be important to separate changes that are occurring naturally and via other sources from changes that may possibly occur because of the project.</p>
Wetland Impacts and Permitting	<p>Ask to add language</p>	<p>Wetland impacts and mitigation are determined during the permitting process. Lateral effects have been calculated and avoidance has been determined by setting back the levies and exterior ditches from the property lines and from the high value fen. If DNR feels there is further potential for impacts beyond what is contained within the permit, they should specifically identify what the impacts are and the source of the impacts during their participation in the Wetland Conservation Act process.</p>
Rare species	<p>acknowledge the potential need for a Endg and Threatened Species Permit</p>	<p>The Two Rivers Watershed District acknowledges this concern, and concurs that it will apply for all required permits, including the accidental taking of state listed species.</p>
Land exchange	<p>Add map showing the land exchange</p>	<p>The DNR has stated the land exchange cannot move forward until the EAW is completed. Now that the EAW process is nearing an end, recent discussions with DNR indicate the process is now moving forward. Final acres will not be determined until land appraisals are completed. At this time it may be premature to put out a map because both the land exchange and WCA process are in the early application stages and may be subject to change. A map and description of the exchange was submitted to DNR with the land exchange application.</p>
edits - corrections		<p>Thank you for these comments - we will make the corrections.</p>
Topics for further discssion - Operating Plan - AIS	<p>discussion</p>	<p>We have worked with DNR and other agencies for the past 10+ years with the Project Team, Fen Plan, Operating Plan, Monitoring, and numerous other items. We will continue to work with all agencies and continue these discussions as this project moves forward.</p>