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# Minnesota Department of Natural Resources

Division of Ecological Resources  
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October 2, 2009

Mr. Joseph Yanta  
U.S. Army Corps of Engineers  
190 Fifth Street East  
St. Paul, Minnesota 55101-1638

Mr. Leonard J. Kremer, PE  
Bassett Creek Watershed Management Commission  
c/o Barr Engineering  
4700 West 77<sup>th</sup> Street  
Minneapolis, Minnesota 55435

Re: Bassett Creek Watershed Resource Management Plan; Special Public Notice 2009-01655

Dear Messrs. Yanta and Kremer:

The Minnesota Department of Natural Resources has reviewed the referenced document and offers the following comments for your consideration. The Department concurs with the general concepts laid out in the plan for streambank stabilization. The format of the document is nicely done, and allows for a quick overview of the impacts from each proposed stormwater pond project. However, we request the opportunity to review and comment on detailed plans for each individual work site where streambank stabilization or channel relocation is proposed.

We have concerns about the proposed excavation (creation) of stormwater ponds in wetlands, especially those three projects (GR-2, BC-3, and WTH-2) that propose excavation in public waters, as well as those under Wetland Conservation Act jurisdiction. The Plan correctly notes that Public Waters Work Permits will be required for those projects. As part of the permit process, projects will need to pass a rigorous justification review with a much more thorough discussion of site-specific alternatives. The alternatives analysis on pages 39-41 is not convincing that sequencing has been thoroughly accomplished. More specifically, it appears that alternatives that make greater use of uplands sites next to the wetlands have not been thoroughly evaluated for avoidance opportunities. Mitigation for any unavoidable impacts will likely be required.

Paragraphs 3.3.2 and 5.1.2 discuss Public Water impacts and permitting, but do not clearly note that the creek reaches where stabilization work is proposed are also Public Waters, and individual Public Waters permits may be required depending on the specific stabilization measures proposed at each site. For stream reaches where work is proposed, we encourage the Watershed District to analyze the reaches in their entirety using fluvial geomorphologic principals, and to design individual site stabilization techniques within that context.

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The document describes potential impacts to three types of areas of regional significance: Regionally Significant Natural Areas, Regional Ecological Corridors, and Central Region Green Infrastructure. Stormwater ponds are conceptually compatible with both Regional Ecological Corridors and Central Region Green Infrastructure. However, stormwater ponds could alter native plant communities in Regionally Significant Natural Areas. Therefore, we request that the vegetation communities in and near project sites BC-2 and BC-8 be described in greater detail.

Thank you for the opportunity to review the document. For further information from the Department, please contact Area Hydrologist Kate Drewry at 651-259-5753 or Regional Environmental Assessment Ecologist Melissa Doperalski at 651-259-5738.

Sincerely,



Michael R. North

Regional Environmental Assessment Ecologist

Cc: Ian Chisholm, Steve Colvin, Melissa Doperalski, Kate Drewry, Daryl Ellison, Dale Homuth, Joe Kurcinka, JanWolff