

Blue Earth County EAW Comment Response

1. Administrative Corrections and Regulatory Coordination

Agency Comments

Blue Earth County identified several administrative corrections and clarifications within the EAW, including:

- Removal of inactive parcel identification numbers.
- Clarification that Lime Township, rather than Blue Earth County, serves as the permitting authority for building permits.
- Clarification that Blue Earth County reviews grading, erosion control, and stormwater plans only where work affects County right-of-way.
- Addition of Blue Earth County as the delegated permitting authority for well construction and well sealing.
- Addition of the Minnesota Department of Labor and Industry as the plumbing permitting authority.
- Clarification of wetland permitting responsibilities between Blue Earth County and the Minnesota Department of Natural Resources.

Project Response

The Applicant appreciates Blue Earth County's review and recommendations. These comments primarily clarified regulatory jurisdiction and permitting responsibilities rather than identifying environmental concerns with the proposed project.

The project documentation has been updated to accurately reflect the appropriate permitting authorities and agency responsibilities. These revisions improve the accuracy of the project record and provide clearer guidance regarding agency oversight during final design, permitting, and construction.

How the Application Addresses These Comments

The Interim Use Permit application identifies the appropriate local and state agencies responsible for review of individual project components, including:

- Lime Township as the primary land use permitting authority.
- Blue Earth County as the delegated authority for well construction and well sealing.
- Minnesota Department of Labor and Industry for plumbing permits.
- Minnesota Pollution Control Agency for applicable wastewater and stormwater permitting.
- Minnesota Department of Natural Resources for water appropriation, groundwater protection, and calcareous fen review.

The application also recognizes that agency review continues beyond land use approval and that individual permits must be obtained prior to construction of regulated improvements.

Ongoing Coordination

The Applicant will continue coordinating with Blue Earth County throughout final engineering and construction permitting to ensure all applicable County requirements are satisfied. Coordination with other state agencies will likewise continue as individual permits are prepared and submitted.

2. Groundwater Protection and Stormwater Management

Agency Comments

Blue Earth County expressed concerns regarding the unique hydrogeologic characteristics of the former quarry, including the exposed Jordan Sandstone aquifer, shallow or exposed bedrock, and the site's high groundwater sensitivity. The County requested additional information describing how stormwater would be managed to prevent pollutants from entering groundwater and how permanent stormwater infrastructure would be designed given the site's geologic conditions. The County also recommended additional discussion regarding groundwater flow and the relationship between quarry water features and surrounding groundwater resources.

Project Response

The Applicant recognizes that groundwater protection is one of the most important environmental considerations for the project and has continued refining the project design following completion of the EAW. Since preparation of the EAW, the project has eliminated continuous dewatering activities, further reducing the potential for impacts to groundwater resources and allowing the former quarry lakes to function under natural groundwater conditions.

Permanent stormwater management will be designed during final engineering in accordance with applicable MPCA Construction Stormwater Permit requirements and will incorporate best management practices appropriate for the site's exposed bedrock and groundwater conditions. Rather than relying on direct discharge, stormwater will be managed through pretreatment practices such as vegetated swales, sediment forebays, and other treatment measures intended to reduce sediment and pollutants before runoff enters quarry water features.

The project also recognizes the unique groundwater sensitivity of the site. Final grading, drainage, and stormwater infrastructure will be designed to minimize the potential for

groundwater contamination while maintaining the natural hydrologic function of the reclaimed quarry.

How the Application Addresses These Comments

The Interim Use Permit application incorporates these commitments through:

- Preparation of a comprehensive Stormwater Pollution Prevention Plan (SWPPP) prior to construction.
- Final engineering of permanent stormwater infrastructure consistent with MPCA permit requirements.
- Use of water quality treatment best management practices prior to discharge to quarry water features.
- Continued coordination with Blue Earth County, the Minnesota Pollution Control Agency, and the Minnesota Department of Natural Resources during final design and permitting.

Ongoing Coordination

Because stormwater design will be finalized during the engineering phase, the Applicant will continue coordinating with the appropriate regulatory agencies to ensure that final grading, stormwater treatment, and drainage systems meet all applicable state and local requirements while protecting groundwater resources.

3. Water Supply, Water Appropriation, and Continued Agency Coordination

Agency Comments

Blue Earth County requested clarification regarding the project's anticipated water demand, well capacity, aquifer information, and future water supply planning. The County also noted corrections regarding well permitting authority and requested additional information regarding future water use. The DNR similarly identified the need for continued coordination regarding groundwater use, water appropriation, and protection of groundwater resources as final project plans are developed.

Project Response

Since completion of the EAW, the Applicant has continued refining the project's water supply system and evaluating anticipated operational demands. The current design proposes two independent well systems serving separate portions of the campground, significantly reducing demand on any individual well and improving overall system reliability.

Updated water demand modeling has been completed using revised campground layouts, bathhouse facilities, and lodge operations to verify that adequate water supplies can be provided during peak seasonal conditions. As final engineering progresses, the water system will continue to be refined to ensure adequate capacity while minimizing groundwater withdrawals.

The project also includes recreational water features and seasonal irrigation that will require water appropriation permits from the Minnesota Department of Natural Resources. Final pumping rates, operating schedules, and system design will be submitted to the DNR as part of the water appropriation permitting process. This review will ensure that groundwater withdrawals are compatible with long-term groundwater sustainability and protective of adjacent natural resources.

How the Application Addresses These Comments

The Interim Use Permit application incorporates these commitments through:

- Development of a dual-well water supply system to distribute demand across the project.
- Updated water demand analyses to verify adequate system capacity during peak operating conditions.
- Continued refinement of recreational water feature operations to minimize unnecessary groundwater withdrawals.
- Submission of final water appropriation information to the Minnesota Department of Natural Resources for review and approval prior to operation of regulated pumping systems.

Ongoing Coordination

The Applicant will continue coordinating with Blue Earth County regarding well construction and permitting requirements and with the Minnesota Department of Natural Resources regarding water appropriation permitting. Any new wells, pumping systems, or groundwater withdrawals requiring regulatory approval will be reviewed and permitted prior to construction and operation.

4. Lime 30 Calcareous Fen and Groundwater Resource Protection

Agency Comments

Blue Earth County noted that the Environmental Assessment Worksheet should more fully recognize the Lime 30 Calcareous Fen as a significant ecological resource and provide additional discussion regarding the groundwater connection between the reclaimed quarry

and the fen. The County also requested additional explanation describing how project design and operation will protect groundwater quality and associated natural resources.

Project Response

The Applicant acknowledges that protection of the Lime 30 Calcareous Fen and the associated groundwater system is one of the project's most important environmental considerations. As the project has advanced beyond the Environmental Assessment Worksheet, groundwater protection has become a primary design objective incorporated throughout the engineering and permitting process.

The Interim Use Permit application recognizes that the reclaimed quarry exists within a sensitive hydrogeologic setting and that groundwater quality and groundwater elevations are important considerations for both the project and adjacent natural resources. Accordingly, project planning has emphasized minimizing potential impacts to groundwater through careful site design, responsible stormwater management, and continued refinement of operational practices.

While Blue Earth County identified the importance of these groundwater resources, the Applicant also recognizes that evaluation of potential impacts to the Lime 30 Calcareous Fen falls under the regulatory authority of the Minnesota Department of Natural Resources. The project will continue coordinating with the DNR throughout final engineering and permitting to demonstrate that project design, groundwater use, and operational practices remain protective of the fen and associated groundwater resources.

How the Application Addresses These Comments

The Interim Use Permit application addresses these concerns by:

- Recognizing the ecological significance of the Lime 30 Calcareous Fen and the sensitivity of the site's groundwater resources.
- Incorporating groundwater protection as a primary design consideration throughout project planning.
- Committing to continued coordination with the Minnesota Department of Natural Resources during final engineering and permitting.
- Implementing project design and operational practices intended to protect groundwater quality and maintain compatibility with surrounding natural resources.

Ongoing Coordination

The Applicant will continue working with both Blue Earth County and the Minnesota Department of Natural Resources as final engineering is completed. Information developed through the DNR review process, including groundwater evaluations and permit

review where applicable, will be incorporated into the final project design prior to construction.

5. Summary of Agency Coordination

The Applicant appreciates the detailed review provided by Blue Earth County during the Environmental Assessment Worksheet process. The agency comments have resulted in additional clarification, continued refinement of the project design, and ongoing coordination with state and local regulatory agencies. The Applicant believes the project has been strengthened through this review process and remains committed to implementing the project in a manner that protects groundwater resources, sensitive ecological features, and the surrounding community.

MPCA EAW Comment Response

1. Noise Assessment and Compliance

Agency Comments

The MPCA noted that the Environmental Assessment Worksheet did not contain sufficient information to determine whether the proposed project would comply with Minnesota's state noise standards. The agency encouraged additional evaluation of potential impacts to nearby residential receptors, particularly during nighttime hours, and requested information demonstrating compliance with Minnesota Rules Chapter 7030.

Project Response

Since completion of the Environmental Assessment Worksheet, the Applicant has completed an acoustical analysis evaluating the proposed recreational uses, operational activities, and surrounding land uses. The study considered anticipated operational noise levels, hours of operation, site topography, existing quarry highwalls, and proposed mitigation measures to evaluate compliance with applicable Minnesota noise standards at surrounding residential properties.

The findings of the acoustical study have informed continued refinement of the project design and operating plan, including operational practices and site features intended to minimize off-site noise. The study has been incorporated into the Interim Use Permit application and demonstrates that the proposed project can operate in compliance with applicable state noise standards.

How the Application Addresses These Comments

The Interim Use Permit application addresses the MPCA's comments by:

- Including a comprehensive acoustical study prepared specifically for the proposed project.
- Evaluating potential noise impacts at nearby residential receptors.
- Demonstrating compliance with applicable Minnesota noise standards.
- Incorporating operational and site design measures intended to minimize off-site noise impacts.

2. Watershed Protection and Stormwater Management

Agency Comments

The MPCA emphasized the importance of preventing construction-related sediment and stormwater runoff from reaching Unnamed Creek and, ultimately, the Minnesota River. The agency encouraged implementation of enhanced erosion and sediment control measures

during construction and continued use of best management practices to protect downstream water quality. The MPCA also noted that the project ultimately drains to an impaired reach of the Minnesota River, making effective stormwater management an important component of the project.

Project Response

The Applicant recognizes the importance of protecting downstream water resources throughout both construction and long-term operation of the project. Stormwater management has continued to be refined through the engineering process and will be designed in accordance with applicable MPCA Construction Stormwater Permit requirements and accepted best management practices.

Temporary erosion and sediment control measures will be implemented during construction to minimize off-site sediment transport. Permanent stormwater management facilities will incorporate pretreatment and water quality best management practices appropriate for the reclaimed quarry setting, with the objective of reducing sediment and pollutant transport before runoff reaches downstream receiving waters.

How the Application Addresses These Comments

The Interim Use Permit application incorporates these commitments by:

- Implementing temporary erosion and sediment control measures during construction.
- Designing permanent stormwater management facilities consistent with applicable MPCA standards.
- Incorporating best management practices to protect downstream water quality.
- Continuing refinement of stormwater management through final engineering and permitting.

3. Continued MPCA Coordination

Agency Comments

The MPCA noted that its comments during the Environmental Assessment Worksheet process do not constitute approval of the project and reminded the Applicant that all required permits must be obtained and applicable permit conditions satisfied prior to construction and operation.

Project Response

The Applicant acknowledges the MPCA's continuing regulatory role and will obtain all applicable permits and approvals required for project construction and operation. Final

engineering, permitting, and project implementation will continue to be coordinated with the MPCA as necessary to ensure compliance with applicable environmental regulations.

Conclusion

The Applicant appreciates the MPCA's review and recommendations throughout the environmental review process. The agency's comments have been incorporated into continued refinement of the project's noise evaluation, stormwater management strategy, and environmental planning. As final engineering progresses, the Applicant remains committed to designing, constructing, and operating the project in a manner that protects neighboring properties, downstream water resources, and the surrounding environment while complying with applicable MPCA regulations.

Minnesota Department of Natural Resources EAW Comment Response

The Applicant appreciates the Minnesota Department of Natural Resources' review of the Environmental Assessment Worksheet and the constructive comments provided throughout the environmental review process. The comments have helped further refine the project and reinforce the importance of protecting the Lime 30 Calcareous Fen, associated groundwater resources, and other sensitive ecological features.

As the project advances beyond the Environmental Assessment Worksheet and into final engineering and permitting, the Applicant remains committed to continued coordination with the DNR. The following summarizes how the project has addressed the principal comments contained within the DNR review letter and how those considerations have been incorporated into the Interim Use Permit application and ongoing project development.

1. Continued Coordination and Regulatory Approval

Agency Comments

The DNR clarified that review of the Environmental Assessment Worksheet does not constitute approval of the project with respect to potential impacts to the Lime 30 Calcareous Fen and its supporting groundwater system. The Department noted that continued coordination is required and that a final project plan, including avoidance measures and supporting technical information, must be submitted and approved in writing prior to construction of activities regulated under Minnesota Statutes Section 103G.223. The DNR also identified several categories of information that will be evaluated during its review, including project design, construction methods, grading, groundwater use, hydrologic impacts, and proposed avoidance measures.

Project Response

The Applicant acknowledges the DNR's role in evaluating the project's potential effects on the groundwater system that supports the Lime 30 Calcareous Fen and recognizes that this review extends beyond the Environmental Assessment Worksheet and Interim Use Permit processes. The Applicant is committed to continued coordination with the DNR throughout final engineering and permitting and will submit the information necessary to support the Department's review of the final project plan.

The Applicant understands that final DNR approval is required for regulated activities affecting the Lime 30 Calcareous Fen and associated groundwater resources and will continue working collaboratively with DNR staff to ensure the project complies with

applicable statutory and permitting requirements before construction of those activities begins.

How the Application Addresses These Comments

The Interim Use Permit application incorporates this commitment by:

- Recognizing the DNR's continuing regulatory role in reviewing project impacts to the Lime 30 Calcareous Fen.
- Committing to submission of final engineering and supporting technical information as part of the applicable DNR review and permitting processes.
- Continuing coordination with DNR staff throughout final design to ensure project implementation remains consistent with applicable state requirements.

2. Protection of the Lime 30 Calcareous Fen Groundwater System

Agency Comments

The DNR emphasized that protection of the groundwater system supporting the Lime 30 Calcareous Fen is a primary consideration for the proposed project. The Department noted that additional information will be required during final project review to demonstrate that project construction, groundwater use, grading, hydrology, and operational activities will avoid adverse impacts to the fen and comply with Minnesota Statutes Section 103G.223.

Project Response

Although the Lime 30 Calcareous Fen is located off-site, the Applicant recognizes the ecological significance of the fen and the importance of protecting the groundwater system that supports it. Protection of groundwater resources has been one of the primary design objectives throughout project planning and refinement.

Since completion of the Environmental Assessment Worksheet, the project has continued to evolve through coordination with the Minnesota Department of Natural Resources and other reviewing agencies. Project planning has focused on minimizing potential impacts to groundwater resources through responsible site design, careful management of stormwater, and refinement of project infrastructure and operations. The Applicant has also eliminated the need for continuous quarry dewatering, allowing groundwater within the reclaimed quarry to remain under natural conditions and reducing the potential for changes to groundwater conditions that could affect surrounding groundwater-dependent resources.

The Applicant understands that demonstrating protection of the Lime 30 Calcareous Fen is an ongoing process that extends beyond the Interim Use Permit. Final engineering, groundwater evaluations, water appropriation review, and project-specific avoidance

measures will continue to be developed and submitted to the DNR as part of the Department's regulatory review.

How the Application Addresses These Comments

The Interim Use Permit application incorporates these commitments by:

- Recognizing the Lime 30 Calcareous Fen and associated groundwater system as environmentally sensitive resources requiring continued protection.
- Incorporating groundwater protection into the overall project design and operational planning.
- Eliminating continuous quarry dewatering from the proposed project design.
- Committing to continued coordination with the DNR as final engineering and permitting progress.
- Developing and implementing project-specific avoidance measures as part of the final DNR review process.

3. Environmental Design and Best Management Practices

Agency Comments

The DNR provided several recommendations intended to further minimize potential environmental impacts during project construction and long-term operation. These recommendations included coordination on native landscaping and seed mixes, consideration of a Kentucky Coffee Tree survey within wooded areas proposed for disturbance, use of wildlife-friendly lighting, avoidance of chloride-based dust suppressants, implementation of wildlife-friendly erosion control products, and adoption of best management practices to prevent the introduction and spread of invasive species.

Project Response

The Applicant appreciates the DNR's recommendations and recognizes that thoughtful environmental design extends beyond regulatory compliance. As final engineering and landscape plans are developed, the project will continue to incorporate environmentally responsible design practices where appropriate and practicable.

Landscape planning will emphasize the use of native vegetation compatible with the site's reclaimed quarry environment while balancing operational, recreational, and maintenance needs. Construction specifications will also incorporate best management practices for erosion and sediment control, invasive species prevention, and protection of adjacent natural resources. In addition, the Applicant will evaluate opportunities to incorporate the DNR's recommendations regarding lighting, vegetation, and other ecological enhancements during final design.

How the Application Addresses These Comments

The Interim Use Permit application reflects the following commitments:

- Continue coordination with the DNR regarding landscape design and native vegetation.
- Incorporate best management practices for erosion control, sediment management, and invasive species prevention during construction.
- Evaluate the DNR's recommendations regarding wildlife-friendly lighting, dust suppression, and vegetation management during final design.
- Continue refining construction specifications to minimize potential environmental impacts while maintaining safe and functional recreational facilities.

4. Conclusion

The Applicant appreciates the Minnesota Department of Natural Resources' thorough review of the Environmental Assessment Worksheet and the constructive recommendations provided throughout the environmental review process. The DNR's comments have contributed to continued refinement of the project and reinforce the importance of protecting groundwater resources, the Lime 30 Calcareous Fen groundwater system, and other environmentally sensitive features.

As the project advances through final engineering and permitting, the Applicant remains committed to continued coordination with the DNR and other regulatory agencies. Final project plans, supporting technical information, and applicable permit applications will be developed in consultation with the Department to ensure the project is implemented in a manner that protects natural resources while providing a high-quality recreational destination within the reclaimed quarry landscape.

The Applicant believes the proposed project demonstrates that recreation, environmental stewardship, and responsible reclamation can successfully coexist through thoughtful planning, sound engineering, and continued collaboration with regulatory agencies.

Minnesota State Historic Preservation Office (SHPO) Response

The Applicant appreciates the Minnesota State Historic Preservation Office's (SHPO) continued review of the Rockwell RV & Adventure Park project and the collaborative coordination that has occurred throughout the cultural resources investigations. The Applicant also appreciates SHPO's review of the Phase IA literature review, Phase I archaeological survey, and Phase I/II architectural history investigations completed for the project.

The following summarizes how SHPO's principal comments have been incorporated into the Interim Use Permit application and ongoing project planning.

1. Historic Resource Identification and Avoidance

Agency Comments

SHPO concurred with the findings of the cultural resource investigations and agreed that additional evaluation of the Mendota–Big Sioux River Military Road was not warranted. SHPO also agreed that the proposed project can avoid adverse effects to identified archaeological resources, including the Mankato Holstein Farm Barn Site (21BE0348), provided those resources continue to be avoided during project implementation.

Project Response

The Applicant appreciates SHPO's concurrence with the completed cultural resource investigations and remains committed to avoiding impacts to identified historic and archaeological resources throughout project construction and operation.

Project planning has intentionally incorporated the locations of known historic resources into the site design, allowing recreational facilities to coexist with significant cultural resources while avoiding direct disturbance of identified archaeological sites.

How the Application Addresses These Comments

The Interim Use Permit application reflects these commitments by:

- Incorporating the findings of the completed cultural resource investigations into the project design.
- Avoiding identified archaeological resources during project development.
- Continuing coordination with SHPO should project conditions or design changes affect previously identified historic resources.

2. Long-Term Historic Resource Stewardship

Agency Comments

SHPO agreed that several recommended stewardship measures would help minimize effects to historic resources, including regular maintenance, interpretive signage, stabilization of historic features, and promoting the history of the area through educational opportunities.

Project Response

The Applicant shares SHPO's goal of preserving and interpreting the historic character of the former quarry property. Rather than viewing these resources as constraints, the project seeks to incorporate them into the visitor experience through thoughtful interpretation, long-term stewardship, and ongoing maintenance.

As final site design progresses, opportunities for interpretive signage, historical education, and preservation of significant historic features will continue to be incorporated where appropriate. These efforts are intended to enhance visitors' understanding of the property's history while protecting the integrity of the remaining historic resources. Preservation and interpretation of the property's historic resources are intended to become an integral part of the visitor experience, allowing guests to better understand the site's agricultural and quarrying heritage while enjoying its modern recreational use.

How the Application Addresses These Comments

The Interim Use Permit application incorporates these commitments by:

- Preserving significant historic resources where feasible.
- Incorporating educational and interpretive opportunities highlighting the property's quarrying and agricultural history.
- Providing long-term maintenance and stewardship of preserved historic resources.
- Continuing to coordinate with SHPO as future preservation opportunities are identified.

3. Continued Coordination

Agency Comments

SHPO noted that its comments were provided as technical assistance during the EAW process and clarified that additional consultation could be required if future federal funding, permits, or licenses trigger review under Section 106 of the National Historic Preservation Act.

Project Response

The Applicant acknowledges SHPO's guidance regarding future coordination requirements and will continue to work with SHPO as appropriate if future project modifications or regulatory processes require additional cultural resource review.

Conclusion

The Applicant appreciates SHPO's continued review and constructive guidance throughout the cultural resources investigations. The completed archaeological and architectural history studies have helped shape the project in a manner that protects significant historic resources while allowing appropriate recreational reuse of the former quarry property. The Applicant remains committed to preserving the site's unique cultural heritage through thoughtful design, long-term stewardship, and continued coordination with SHPO as appropriate.