



STATE OF
MINNESOTA
 DEPARTMENT OF NATURAL RESOURCES

500 LAFAYETTE ROAD • ST. PAUL, MINNESOTA • 55155-40

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 MAY 31 1994
 Ans'd.....

DNR INFORMATION
 (612) 296-6157
 May 23, 1994

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Steve
 for your files
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Ryan Schroeder
 Ramsey City Administrator
 15153 Nowthen Boulevard
 Ramsey, MN 55303

RE: Sunwood Drive NW between Krypton Street & County Road 116
 Environmental Assessment Worksheet (EAW)

Dear Mr. Schroeder:

The Department of Natural Resources (DNR) has reviewed the EAW for the above-mentioned project. We offer the following comments for your consideration.

We appreciate efforts taken by the City to coordinate with DNR personnel the project's design and potential alignment during the planning process. We are concerned that the project will lead to unnecessary impacts to DNR protected water resources, particularly protected waters 2-673W and 2-114P. The EAW correctly indicates that a DNR protected waters permit is required for the project as proposed. The associated permit process requires demonstration of both public need and that no other practical alternatives to protected waters impacts exist. Although safety, cost, and future development potentials are important components of the roadway planning process, only alignment designs which most limit protected waters impacts would likely be permitted.

The alternatives analysis provided in the EAW minimally considers the environmental costs associated with the various alignments and provides little detail regarding potential mitigation of wetland impacts. The preferred alignments, (1A & 2B), will result in the disruption and partial loss of two protected wetlands. Although the EAW indicates that the proposed roadway will fill approximately 0.8 acres of Type III wetland, uncertainty exists because a formal wetland delineation was not completed at the time of EAW preparation. It is very likely that this 0.8 acre estimate is low. Furthermore, regardless of the amount, the EAW should detail proposed mitigation for all expected project-related wetland impacts.

We also note that the preferred alignment results in the permanent conversion of 11.1 acres of wildlife habitat rather than the 6.3 acres indicated in the EAW.

When reviewing other alignment options, use of roadway alignments 1B & 2C would require less wetland fill. This approach avoids one wetland crossing, requires less clearing and grubbing of wooded areas, and provides a good alignment along with the shortest driving distance. The EAW indicates that the disadvantages of this approach consist of more excavation, a more curved and slower route, the purchase and relocation of one residence, and a short sight-distance at one road crossing. The environmental costs of this approach are less than those associated with the preferred alignment.

Other environmentally sound approaches could significantly reduce wetland impacts by either routing the roadway north of Sunfish Lake or by bridging wetlands along the routes already considered.

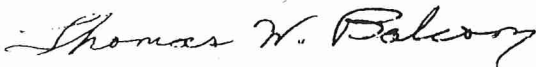
It is uncertain from the information provided whether stormwater runoff will be directly discharged into wetlands from the roadways or street storm sewers. The DNR does not support placement of untreated stormwater runoff into wetlands. Although sedimentation basins and skimmers are mentioned as pretreatment measures, Figures 15 & 16 do not show detention basin placement. These measures require further clarification to better assess proposed protection measures for wetlands.

We appreciate recognition in Item 11b that the Blanding's Turtle, *Emydoidea blandingii*, a state-listed threatened species, is known to frequent the general project area. It does not appear that the DNR Natural Heritage Program was contacted to accurately answer this question. This is an important contact and assists with planning efforts. A search of the Heritage database within a one-mile radius of the proposed project produced a 1989 record for one Blanding's Turtle next to a small pond bordering Sunfish Lake (see attachment). The EAW does not indicate if suitable habitat for the Blanding's Turtle exists in the project area, and if it does, what efforts to avoid impacts to this species are offered. It is possible that such a determination could be made as a component of the needed wetland delineation yet to be done. Please contact Jan Shaw Wolff of the Heritage Program at (612) 296-8279 for further information in this regard.

As previously mentioned, efforts to incorporate DNR staff input into the project design process is appreciated. We request that this consultation continue. The DNR recognizes the City of Ramsey's desire to provide a transportation network designed to meet the current and future needs of its citizenry. However, environmental costs, specifically those involving wetlands, require incorporation into the planning process as well. This issue in particular will be examined further as a component of any required DNR permit associated with this development.

Thank you for the opportunity to review this document. We look forward to receiving your record of decision and responses to comments. Minnesota Rules part 4410.1700, subparts 4 & 5, requires you to send us your Record of Decision within five days of deciding this action. Please contact Don Buckhout of my staff, at (612) 296-8212, if you have questions regarding this letter.

Sincerely,



Thomas W. Balcom, Supervisor
Natural Resources Environmental Review Section
Office of Planning

:attachment

c: Kathleen Wallace
Steve Colvin
Pete Otterson
Jan Shaw Wolff
Lynn M. Lewis, USFWS
Gregg Downing, EQB

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