



The Oldest City in Minnesota

Mr. Bob Edstrom
US Army Corps of Engineers
St. Paul District, Attention Project Management
180 5th Street East, Suite 700
St. Paul, MN 55101

Dear Mr. Edstrom,

The purpose of this letter is to provide City of Wabasha comments on the Draft Feasibility Report and Integrated Environmental Assessment for the Lower Pool 4 Dredged Material Management Plan. We understand that this document serves as the Draft Environmental Assessment in the federal National Environmental Policy Act (NEPA) impact evaluation process. Through the remainder of this letter the document will be referred to as the Draft Environmental Assessment (Draft EA).

The Draft EA identifies and evaluates a Tentatively Selected Plan (TSP) for the on-shore management of dredged material from Lower Pool 4 for the next 40 years. The TSP identifies three sites within the City of Wabasha that would be used as transfer locations; Carrels (east and west), and Southside Fitzgerald, and the Wabasha Gravel Pit Site. On approximately an annual basis, material would be trucked from these sites to permanent placement sites discussed in the Draft EA located outside of the City.

We are opposed to the TSP as proposed. This is due to a range of concerns including those discussed under the following headings.

A. Socioeconomic Effects - Transportation

1. A primary potential for concern is associated with elevated truck traffic on roadways within town. According to Appendix A of the Draft EA, approximately 226,000 cubic yards (CY) of dredged material will need to be hauled from some combination of the identified transfer sites within the City to permanent placement sites outside the City (the Executive Summary identifies this figure as 270,000 CY annually – this discrepancy is not explained in the Draft EA). Based on information in the Draft EA, this equates to 15,000 annual truck loads (30,000 total trips out and in) on streets within the City. Is this discrepancy due to material planned to be off loaded to the Wisconsin/Alma site?
2. The main body of the Draft EA generally discounts the potential for problematic transportation impacts by presenting that the percentage of total vehicle trips on Wabasha area roadways that would be truck trips would be low, “3-4 percent.” First, the Draft EA does not identify 3-4 percent of *what*. Is this a percentage of total traffic on streets within the city (it is not clear how this would be calculated)? Is it a percentage of average traffic on collector and arterial roadways? More importantly, this percentage is artificially low because it takes truck trips that would be

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concentrated into the assumed 75 day trucking period (mechanical material conveyance scenario) and compares them to annual averages in terms of existing traffic volumes. Translating the 3-4 percent estimate to one actually applicable to the 75 day trucking period would mean dredging operation truck traffic would be 14.6-19.5 percent of traffic in the City during the trucking period.¹ If the draft EA percentage information identified above is referring to truck loads only (not including the return trip) as appears to be the common presentation in the document, then these revised percentages would also need to be doubled. In sum, this 3-4 percent information is unclear and significantly under-reports the potential for impacts.

3. The point made in City comment A.2, above, applies to more detailed information provided by the US Corps of Engineers (COE) in Appendix A of the Draft EA. On Page A-11, the evaluation identifies that 349 truck trips accessing the Southside Fitzgerald site (assuming a hydraulic dredging scenario) equates to 33 Average Annual Daily (AADT) trips. This appears to be taking the 348 trips over 17 days (5,916 total), multiplying by two to account for return truck trips, and spreading them out over the entire year. When considering the potential for congestion, safety, and other impacts, comparing truck trips during the trucking period to total annual trips is intuitively not appropriate. This approach is analogous to taking traffic generated during a Minnesota Vikings game, averaging it over a year, and stating that because these trips are a very small percentage of annual trips on the adjacent street network, Vikings games do not have local traffic impacts.
4. While the Draft EA addresses the potential for increased congestion, crashes, and roadway wear due to added truck traffic (we have already noted our questions regarding this presentation), it significantly does not address the potential for general nuisance impacts, such as many heavy trucks per day through residential areas during the trucking periods. For example, under the hydraulic dredging scenario presented in Appendix A, 349 heavy truck loads (698 total truck trips) per day would access the Southside Fitzgerald site for 17 days. Granted, this would not be a lengthy overall duration, but this would be 70 trucks per hour through sensitive residential areas. Even with the new roadway section proposed in the Draft EA between 4th Avenue SE and Hiawatha Drive SE along the Dugan Avenue alignment, these trucks would be passing through residential areas. They would be passing within 30-35 feet of existing homes in the 4th Street SE/Dugan Avenue area. Given that the base of the Southside Fitzgerald site is approximately 20 feet lower than the elevation of Dugan Avenue at River Drive, trucks will be particularly loud climbing out from the material transfer location to the adjacent roadway system.
5. The Draft EA provides information regarding improvements that MnDOT is planning to construct on TH 61 at 5th Grant Boulevard and Shields Avenue within Wabasha.² It also states that, if these improvements do not advance, the haul route from Carrel's site would need to access Trunk Highway (TH 61) at Pembroke Avenue (TH 60) rather than at 5th Grant Boulevard. For the record, the City is aware of the MnDOT improvement projects referenced. These projects are programmed for 2019. The City would expect no operations at Carrel's site prior to completion of the intersection safety projects on TH 61 referenced in the Draft EA. Also, the County 10 intersection would not be upgraded if there was not a platted road on the USCOE property.

¹ 365 days/75 days = 4.87; 3% x 4.87 = 14.6%; 4% x 4.87 = 19.5%

² Top paragraph of Page 73 of the IEA.

6. The TSP identifies that access to the Southside Fitzgerald site would be via an improved and extended Dugan Avenue. This is City-owned roadway on City right-of-way. The ability of the City to negotiate with COE regarding improvement and use of this roadway for the proposed trucking operations would be contingent upon COE responses to considerations raised in this letter.
7. The Draft EA identifies that some of the material temporarily stored at the Carrels site would be trucked east on 5th Grant Boulevard to Walnut Avenue (Trunk Highway 60) to the Wiesenbeck West permanent placement site across the river in Wisconsin. The City has concerns that this route includes the entrance to the Saint Elizabeth Medical Center and Pharmacy, Mayo Clinic Health System, and the Covidien/Medtronic manufacturing plant, which are three of the largest employers in the city and generate considerable turning movements on 5th Grant Boulevard from their parking lots for patients, visitors and customer traffic in addition to their employees.

B. Socioeconomic Effects - Noise and Aesthetics

1. Under Federal Highway Administration requirements, a detailed noise analysis would likely be required for the Dugan Avenue extension. Please confirm that COE has no corresponding requirements. Noise is also a consideration on 5th Grant Boulevard as it passes a hospital, clinic and assisted living facility.
2. The discussion of aesthetic impacts is very brief and generalized. There is no discussion of specific sites. The site of most concern to the City would be the Southside Fitzgerald site due to adjacent homes. It is the City's understanding that piles of decanting/decanted sediment would be in place for up to a year.

C. Other Environmental Categories

1. Other than Socioeconomic Effects, the Draft EA reviews the following environmental categories
 - a. Physical Setting (hydrology, aquatic habitat/wetlands, terrestrial habitat, threatened and endangered species, and air quality)
 - b. Cultural Resources (historic/archaeological)
 - c. Cumulative Impacts
2. Regarding the Physical Setting and Cultural Resource categories, there do not appear to be unique or problematic impacts associated with the proposed project under these categories. This assumes that all applicable regulatory requirements are met, for example for wetlands (Section 404 of the Clean Water Act) and historic/archaeological (Section 106 of the Historic Preservation Act). The Carrels East site is within the 100 year floodplain. Detailed regulatory and associated mitigation requirements are generally determined subsequent to the National Environmental Policy Act (NEPA) review which this IEA is part of.
3. In the subsection 7.4.8 (Cumulative Effects), the Draft EA references that the TSP would result in "incremental" increases in truck traffic. As discussed in a previous response, this underrepresents

the percentage of overall traffic that would be truck traffic during the actual trucking period or periods. In addition, industrial sand mining operations have been permitted to have truck operations through the City per a previous legal process. These operations currently are not underway due to the relatively depressed prices for crude oil. However, once oil prices increase as they certainly will at some point in the future and the economics of industrial sand mining and transport are once again favorable, the trucks from the TSP would be combined with these other trucking operations. The NEPA review process needs to address this potential for cumulative effects.

4. The City of Wabasha does not support the use of active farmland as permanent sand placement sites within the City and in surrounding areas. Agricultural land uses should be protected so that economically viable farms can be sustained and expanded. Active farms and their employees economically support our City, preserve the environment, and provide locally grown food to our community.

D. Local Zoning and Land Use

The East & West Carrels properties are zoned R-1 (Low Density Residential). The Southside Fitzgerald Site is zoned RRG1 (Rural Residential Growth Transitional). Both the Carrels and Fitzgerald properties have a land use designation of "Low Density Residential." The East & West Carrels properties are currently vacant and the Fitzgerald property is currently used for agricultural purposes.

Given that the surrounding properties in both areas are predominantly low density residential or agricultural uses, the proposed industrial use of transferring and hauling sand off-site would not be a compatible land use in either area. A formal rezone of these properties from their current zones to an industrial zone could be considered spot zoning and would most likely not be approved. The City anticipates that material storage and trucking operations involving the Southside Fitzgerald site would significantly reduce local property values. These local property owners can be expected to seek monetary restitution for damages.

We understand that federal preemption over our local zoning ordinance is applicable, but we would request that all possible mitigation efforts be followed given that these areas would most likely not be allowed industrial uses without federal preemption.

E. Inadequate Notification

The only residents who received direct notification of the Draft EA were those property owners whose land is proposed to be acquired. There are many other property owners who would be adversely impacted by the TSP as currently proposed, most notably those in the vicinity of the Southside Fitzgerald site. These property owners received no direct notification of availability of the Draft EA for review.

F. Alternatives

The majority of the City's concerns with the TSP have to do with transfer operations at the Southside Fitzgerald site. As stated above, this is due to factors including land use incompatibility, transportation impacts, and loss of property values.

Appendix A of the Draft EA identifies that numerous scenarios regarding a mix of transfer and final placement locations with associated trucking operations were evaluated. Under the Transportation heading in subsection 7.1 (Socioeconomic Effects), the Draft EA assumes 200 additional trucks per day (400 total truck trips including return trips) for up to approximately 75 days per year. These are the same parameters identified in Appendix A of the scenario of using the Carrels site only for transfer operations (i.e. no use of Southside Fitzgerald). In subsection 5.8.2, the Draft EA identifies that dredged material could be barged (mechanical conveyance) or pumped (hydraulic conveyance) to Carrels site from all four of the current island transfer sites, as well as directly from the dredge cuts.

In light of this information, the City recommends that the Southside Fitzgerald site be removed from the TSP.

Consideration of alternatives is a primary goal of the NEPA process. The only alternative that was considered was the No-Action Alternative (Section 5.1). This was modified by the COE to be a "no change" alternative (from previous practices) because dredging was judged to be an on-going program.

We think this is an inadequate approach to the NEPA goals of evaluating alternatives. No mention was made of *prevention* of sand and silt from reaching the Mississippi river channel. We think that buffer strips, stream diversion, stream bank protection and preliminary holding ponds in the Chippewa River basin could be an effective and economically viable alternative to mechanical dredging and removal or at least reduce the large amount of material to be dredged from the Mississippi River.

G. Summary – Required Coordination

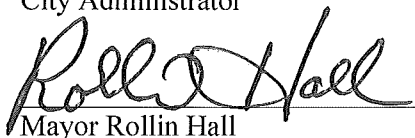
As summarized under the preceding headings, the City of Wabasha has numerous questions and concerns regarding the TSP. Therefore, the City requests a meeting or meetings to discuss these issues and to participate in appropriate revisions to the TSP and/or determination of mitigation measures. The City would expect these meetings and substantive resolution of the concerns raised prior to issuance of a Finding of No Significant Impact, which would conclude the NEPA environmental review process.

Discussed and approved by City Council on this 6th day of June 2017.



Chad Springer
City Administrator

6/8/17
Date



Mayor Rollin Hall

6/8/17
Date

CC: Representative Haley
Representative Lewis
Senator Goggin
Senator Klobuchar