DEPARTMENT OF NATURAL RESOURCES

Division of Ecological and Water Resources
Region 3 Headquarters
1200 Warner Road
Saint Paul, MN 55106

Transmitted by Email

April 17, 2025

Elizabeth Howard, City Administrator
City of Pine Island
250 South Main Street
Pine Island, MN 55963

Dear Elizabeth Howard,

Thank you for the opportunity to review the Project Skyway Scoping Document in preparation for an Alternative Urban Areawide Review (AUAR) for the project area located in Goodhue County. The DNR respectfully submits the following comments for your consideration:

1. Page 9, Table 2. Climate Considerations and Adaptations. As energy needs and renewable energy goals put further pressure on agricultural lands, some communities have started to tap into industrial facilities to combine development with energy production through the use of rooftop solar. Installing solar panels on industrial facilities has the added benefit of producing energy right where it is needed without any additional facility footprint. We encourage the City as well as local energy providers to explore the feasibility of combining these land uses to help meet state climate goals as the City plans for the future.

   We encourage the developer to consider installing water reuse systems to reduce water usage, and utilize other water conservation measures to the greatest extent possible.

2. Page 16, Geology. With the potential for karst conditions, potential pollutants need to be handled with care in order to protect the drinking water of everyone in the area. Geotechnical investigations should used to determine that structures on the site will be supported by underlying geologic materials, as well as the suitability of the site for stormwater management.

3. Page 25, Water Appropriation. A DNR Water Appropriation Permit is required if the water pumped exceeds 10,000 gallons in a day, or one million gallons in one year. The DNR General Permit for Temporary Appropriation, with its lower permit application fee and reduced time for review, may be used for the dewatering if the dewatering volume is less than 50 million gallons

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4. Page 25, Water Appropriation. The AUAR should address the water demands for the site and the existing city water system capacity as well as what is proposed for the future city water system. It will be important for the upcoming AUAR to follow the AUAR Guidance in the instructions that says, *"If the area requires new water supply wells, specific information about that appropriation and its potential impacts on groundwater levels should be given; if groundwater levels would be affected, any impacts resulting on other resources should be addressed."* In the upcoming AUAR, please include:

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a. **Details on water demand for each of the scenarios, and compare that demand with the City's current permitted volume and production capabilities. If the area requires new water supply wells, specific information about that appropriation and its potential impacts on groundwater levels should be given; if groundwater levels would be affected, any impacts resulting on other resources should be addressed. The siting of new well(s) would be very important to this analysis.**

b. **Evaluation of a new or amended DNR Water Appropriation Permit must include consideration of the sustainability standard (MN statute 103G.287 Subd.5). As per instructions for completing 12.b.iii, please:**

   i. **Discuss how the proposed water use is resilient in the event of changes in total precipitation, large precipitation events, drought, increased temperatures, variable surface water flows and elevations, and longer growing seasons.**

   ii. **Identify any measures to avoid, minimize, or mitigate environmental effects from the water appropriation.**

   iii. **Describe contingency plans should the appropriation volume increase beyond infrastructure capacity or water supply for the project diminish in quantity or quality, such as reuse of water, connections with another water source, or emergency connections.**

5. Page 38, Cumulative Potential Effects. The scoping document looked out one-mile from the project area when considering cumulative potential effects, however a new municipal water system would be required for this project and should be fully evaluated based on where new wells would be constructed, what aquifer they would be utilizing, and what resources are within the vicinity that could be affected by the increase in groundwater pumping.

Thank you again for the opportunity to review this document. Please let me know if you have any questions.

Sincerely,

Melissa Collins

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