

Aubree Derksen

On the very first page of Appendix J it says "Acalcareous fen (Wanamingo 22, Fen ID#29025) was documented approximately 3 miles from the proposed project. A calcareous fen is a rare and distinctive peat-accumulating wetland that is legally protected in Minnesota. The Wetlands Conservation Act (WCA), authorized by Minnesota Statutes, section 103G.223, states that calcareous fens may not be filled, drained, or otherwise degraded, wholly or partially, by any activity, except as provided for in a management plan approved by the commissioner of the Department of Natural Resources. Many of the unique characteristics of calcareous fens result from the upwelling of groundwater through calcareous substrates. Because of this dependence on groundwater hydrology, calcareous fens can be affected by nearby activities or even those several miles away. For more information regarding calcareous fens, please see the Calcareous Fen Fact Sheet. To minimize stormwater impacts, please refer to the Minnesota Pollution Control Agency's General Principles for Erosion Prevention and Sediment Control in the Minnesota Stormwater Manual. Please note that calcareous fens are "Special Waters" and a buffer zone may be required. Calcareous fens may be impacted by activities within the fen, activities that affect surface water flows (e.g., stormwater flow, erosion), or activities that affect groundwater hydrology (e.g., groundwater North Zumbro Sanitary District MCE-2025-00612 Page 2 of 6 pumping, contamination, or discharge) even several miles away. Given the project details, impacts are not anticipated. If the proposed project will alter the hydrological conditions in the surrounding area, contact the Calcareous Fen Program Coordinator, Keylor Andrews (Keylor.Andrews@state.mn.us)."

The EAW mentioned the rest of the letter but failed to mention the Calcareous Fen at all and that there is a very specific person that needs to be contacted regarding this very rare species that is located near the project and is known to be impacted even within several miles of a project. That is an oversight that needs to be corrected immediately and the mitigation plans listed need to specifically address this particular species and this particular point person and include proof of contact with this particular point person. There is also going to need to be further analysis of the mitigation plans listed and how they intersect with insect species for example. Doing construction on frozen ground may help mitigate harm to a tree species but may cause undue harm to an insect species like the fireflies or bees that hibernate and burrow during the winter and are facing population decline. While a mitigation strategy of construction is frozen ground is a mention of a seasonal timeframe it is the only mention of seasonal timeframes given for plants and that is also an oversight that would need to be corrected for proper mitigation strategies. You would need to know specific times of day that are less likely to interfere with pollinators and ensure construction is not happening at a critical time when an insect species that depends on that plant as its host plant is spawning for example. You don't want construction to happen at critical times for the plant when accidentally damaging it would result in preventing it from blooming for example.