

Instructions: This form provides general guidance on information that may be necessary for antidegradation review. The Minnesota Pollution Control Agency (MPCA) reserves the right to request information from the applicant in addition to that provided in this form.

Section 401 of the Clean Water Act requires any applicant for a federal license or permit that authorizes an activity that may result in a discharge to Waters of the United States to obtain certification from the state or tribe in which the discharge originates to ensure compliance with applicable water quality standards. In addition to completing the Joint Application Form, <https://bwsr.state.mn.us/joint-application-form>, applicants whose proposed projects may require an MPCA Individual 401 Water Quality Certification for work in aquatic resources must also provide the information necessary to demonstrate compliance with the Minnesota antidegradation water quality standards (Minn. R. 7050.0265, <https://www.revisor.mn.gov/rules/7050.0265/>). Applicants should review the antidegradation requirements in Minn. R. 7050.0285 (<https://www.revisor.mn.gov/rules/7050.0285/>) prior to completing this form.

The purpose of the antidegradation requirements is to achieve and maintain the highest possible quality in surface waters of the state. To accomplish this purpose, antidegradation requires:

- A. The protection of existing uses and the level of water quality necessary to protect existing uses;
- B. The minimization of degradation of high water quality, and only to extent necessary to accommodate important economic or social development;
- C. The protection of outstanding resource value waters; and
- D. Consideration of thermal discharges.

Applicant information

Applicant name/Project name/USACE ID number: Chad Gramentz, PE-Kanabec County Engineer/KCP 23-01

Date submitted (mm/dd/yyyy): 04/27/2026

1. Environmental Assessment Worksheet (EAW)/Environmental Impact Statement (EIS)

Note: The MPCA cannot make any certification decision until the Environmental Review process is complete.

Is environmental review (Environmental Assessment Worksheet, Environmental Impact Statement, Categorical Exclusion (Catex), etc.) **required** for this project? Yes No

If yes, include the date record of decision (ROD) / finding of fact (FOF) was completed and the decision: _____

For responses for questions 2 through 12, if you are referencing other documents, please attach them and provide an exact citation to where the information can be found. If the project manager cannot find it, the antidegradation may be sent back as incomplete.

2. Analysis of alternatives to project design that avoid or minimize degradation

(This does not include the Preferred Alternative discussed below.)

Describe your analysis of at least two prudent and feasible alternative project designs that would avoid or minimize degradation and avoid or minimize net increases in loading of pollutants or other causes of degradation to surface water (such as wetlands, lakes, stream, etc.). The analysis of each alternative must include a description of how impacts to surface waters are avoided and/or minimized; information on any design considerations and constraints; expected performance, construction, operation, and maintenance costs; and reliability for each alternative. If one of the alternatives is no build, an explanation must be provided why that is not feasible. [Minn. R. 7050.0280, subp. 2](#)

ALTERNATIVE 1: Regrading and bituminous overlay on the existing horizontal alignment. Following the original alignment limits the impact to the wetland areas near and west of the county road 80 intersection because a new road core would not be established in the wetland areas. Maintaining the current alignment would include maintaining the five reverse curves at and west of county road 80. This scenario is undesirable in a high speed traffic condition as it creates confusion and increased workload for drivers and elevates crash risk. An uncorrected horizontal alignment would be unacceptable from a safety aspect.

ALTERNATIVE 2: No rebuild. This project's intent is to aid in the improvement of the economic and residential transportation systems throughout Kanabec County. Projects of this type achieve increased safety on Kanabec County roadways as well as increased accessibility throughout the county. These goals will not be met if this project is not completed.

3. Preferred alternative project design:

Describe the analysis of your preferred alternative project design that avoids or minimizes net increases in loading of pollutants or other causes of degradation. The analysis must include a description of how impacts to surface waters are avoided and/or minimized; information on any design considerations and constraints; expected performance, construction, operation, and maintenance costs; and reliability for each alternative. In addition, the analysis must verify that the preferred alternative is the least degrading prudent and feasible alternative for surface water. If the preferred alternative is not the least degrading alternative, then you must provide an explanation of the constraints. Explanation of least impacts should also include pollutant loading. For example: hard-armoring a stream bank might reduce TSS, but could increase velocity and create downstream erosion or loss of habitat for aquatic organisms. [Minn. R. 7050.0280, subp.2](#)

Kanabec County's preferred alternative is to realign the roadway, but use a narrower design geometry than typically used by the county to reduce the overall footprint of the project. CR 25 will be reconstructed with 12' lanes, 4' shoulders, and 3:1 inslopes versus the preferred 12' lanes, 6' shoulders, and 4:1 inslopes. This reduced road cross section will minimize both excavation and fill of adjacent wetlands along the entire length of roadway.

4. Water quality parameters of concern

List the water quality parameters of concern for the project. These parameters should relate to the proposed project or activity type. *Examples: Total Suspended Solids (TSS), Dissolved Oxygen (DO), Mercury (Hg), Temperature, PCBs, flow volume, velocity, etc.*

Risk of increased total suspended solids during culvert replacement or if there is a significant rain event. Increased flow volume and velocity as a result of the improved ditches. Knife River (ID# 07030004-549) located .6 miles west of the project is impaired due to E. Coli. but there will be no impacts to this waterway.

5. Existing uses and level of water quality necessary to protect uses

Antidegradation requires the protection of existing uses and the protection of the water quality necessary to protect those uses ([Minn. R. 7050.0265, subp. 2](#)). Existing use is defined as *those uses actually attained in the surface water on or after November 8, 1975* ([Minn. R. 7050.0255 subp. 15](#)).

Example 1: A surface water is in pristine condition on November 28, 1975, but development or other impacts have degraded that same water and it is no longer a high quality surface water. The existing use is the pristine water.

Example 2: A stream is highly degraded for several decades until it is restored to a trout stream in 1990. The existing use is the restored trout stream.

In the table below:

Identify all streams, rivers, wetlands and lakes within a mile radius of the project location by Waterbody Identification Number (WID). WIDs, and other information, can be found by using the map at: [EDA: Surface water data](#). Identify the use classification and existing use for all surface waters potentially impacted by this project. Include surface waters that are not directly within the project area but may be *potentially impacted even if they are more than one mile away*. Review Minn. R. 7050.0415 – 7050.0430 for the use classification that fits the waters potentially impacted by your project. Use classifications are also located at <https://www.revisor.mn.gov/rules/?id=7050>.

Also, identify the existing water quality of each surface water for the water quality parameters of concern. The methods for determining existing water quality are found in [Minn. R. 7050.0260](#).

Streams and rivers

If the waterbody is a stream/river and not listed in *Beneficial use designations for stream reaches* the beneficial uses are 2Bg, 3, 4A, 4B, 5 and 6.

Lakes and wetlands

To find beneficial use designations for lakes and wetlands, check [Minn. R. 7050.0470](#). Waterbodies described in both documents are arranged by major watershed basins in this document. If the waterbody is a wetland and not listed in Minn. R. 7050.0470, the unlisted default beneficial uses are 2D, 3, 4A, 4B, 5 and 6. If the waterbody is a lake and not listed in Minn. R. 7050.0470 the beneficial uses are 2B, 3, 4A, 4B, 5 and 6.

Exceptions: Water bodies in the Boundary Waters Canoe Area Wilderness and in Voyageurs National Park **that are not listed**, may have different Use Classifications (Beneficial use designations).

Name of surface water/Waterbody and Waterbody Identification Number (AUID), if applicable.	Use classification	Existing use (highest quality attained from November 28, 1975 to present)	Existing water quality
Knife River 07030004-549	2Bg	Aquatic Consumption, Aquatic Life, Aquatic Recreation	Aquatic Consumption-not assessed / Aquatic Life-standards met / Aquatic Rec.-one or more standards not met
Unnamed creek 07030004-581	2Bg	Aquatic Consumption, Aquatic Life, Aquatic Recreation	Not Assessed
33-0146-00 Bachman Pond	2B	Aquatic Consumption, Aquatic Life, Aquatic Recreation	Not Assessed
33-0085-00 Unnamed	2B	Aquatic Consumption, Aquatic Life, Aquatic Recreation	Not Assessed
Various unnamed delineated wetlands (See Joint Wetlands Application)			

6. Water quality comparison before and after project

For each surface water listed in Section 5, describe the anticipated water quality after the project is fully complete and operational. If any portion of the surface area of a water resource will be permanently impacted, a Mitigation Plan will be required (see Section 12). If water quality improvements are anticipated, please provide calculations or a detailed explanation of how you came to this conclusion.

Knife River 07030004-549	No change-Aquatic Consumption-not assessed / Aquatic Life-standards met / Aquatic Rec.-one or more standards not met
Unnamed creek 07030004-581	No change-Not Assessed
33-0146-00 Bachman Pond	No change-Not Assessed
33-0085-00 Unnamed	No change-Not Assessed
Various unnamed delineated wetlands (See Joint Wetlands Application)	See Exc./Fill Impacts in Joint Wetlands Application table

7. Impaired waters and Total Maximum Daily Loads (TMDL)

Identify ALL surface waters listed in Section 5 that are listed on the Minnesota Impaired Waters List (<https://www.pca.state.mn.us/water/minnesotas-impaired-waters-list>). List the impairment for each surface water identified and state whether or not a total maximum daily load study (TMDL) has been completed for the waterbody.

Name of waterbody	Impairment	TMDL completed? (Y/N)
Knife River 07030004-549	E. coli	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		<input type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> Yes <input type="checkbox"/> No

8. Physical alterations of surface waters

Identify ALL surface waters listed in Section 5 that are listed on the Minnesota Impaired Waters List (<https://www.pca.state.mn.us/water/minnesotas-impaired-waters-list>). List the physical alteration including hydraulic impacts such as volume, inundation and velocity and the extent/volume of the alteration, also state if the alteration will be permanent (longer than one year) or temporary.

Name of waterbody	Physical alteration	Extent of alteration (include units)	Temporary or permanent
Knife River 07030004-549	None	None	Choose one
Unnamed Tributary or Stream	Culvert Replacement	50 Feet	Permanent
			Choose one

9. Indirect impacts

For all surface waters where partial physical alteration of the function or acreage of the surface water will occur, describe the potential indirect impacts to the remaining surface water and the potential indirect impacts to nearby surface waters. For all surface waters where physical alteration will affect the entire function or acreage of the surface water, describe the potential indirect impacts to nearby surface waters. Indirect impacts may include changes in water source chemistry, timing, water quality (including temperature), water volume or velocity, aquatic species health or population, impervious surfaces and chemical runoff (chloride, petroleum products, etc), vegetation or macroinvertebrate (bug) populations, etc.

There will be no physical alteration to the named surface waters listed that are located near this project. When the project is complete County Road 25 will have an impervious surface in the form of a 32' foot road top. Because the contractors will be required to install and monitor erosion control/soil stabilization along the length of the project there is no expected impact to the surface waters from the impervious surface.

10. Loading and degradation to surface waters

For all surface waters where physical alterations are proposed, describe all anticipated net increases in loading at the project site and downstream. Include all potential causes of degradation expected in each surface water when your preferred alternative project design is fully implemented.

There will be no physical alterations to the named surface waters listed. Because of the scope of this project, there may be areas of increased volume leaving the project area due to the improved ditch grades and capacity. No surface water degradation is expected.

11. Comparison of existing and expected economic conditions and social services

Provide a comparison of existing and expected economic conditions and social services when the proposed project (preferred alternative) is fully implemented. Include a description of economic gains or losses attributable to the proposed activity; contribution to social services; prevention/remediation of environmental or public health threats; climate change considerations, trade-offs between environmental media; the value of the water resources; and other relevant environmental, social, and economic impacts of the proposed activity. [Minn. R. 7050.0265, subp. 5\(B\)](#)

This project is converting a highly used cut across road for residents and commercial traffic in northwestern Kanabec County. The completion of this project will provide improved access to residents along county road 25, 80 and CSAH 15. Additionally, this project creates a through road for commercial traffic, interconnecting TH 65 to CSAH 15 and TH 47. This additional improved access roadway increases the capacity of social and emergency entities to efficiently provide services in northwestern Kanabec County.

12. Description of the Compensatory Mitigation Plan [Minn. R. 7050.0285, subp. 2 \(A-E\)](#)

The applicant may propose to mitigate the project's permanent wetland impacts through an approved wetland bank if the proposed mitigation is for the same resource quality type surface water ("type-for-type") AND the proposed mitigation is located in the same major watershed (<https://www.pca.state.mn.us/water/watersheds>). The applicant may propose to mitigate other surface water resource types with on-site, project-specific mitigation if the mitigation is of the same resource type as the impacted water resource.

Describe any proposed permanent surface water impacts. Include the name of the surface water and AUID if appropriate, the type of impact, and the extent of the impact.

Describe mitigation proposed for permanent surface water impacts.

LGRWRP Mitigation

2.66 Acres

For each surface water listed above, describe how the proposed compensatory mitigation will replace existing uses and maintain the current level of water quality at the proposed project site (e.g., wetland types, replacement ratio, water monitoring data if available).

Describe how the compensatory mitigation will be maintained and the monitoring activities that will be conducted to ensure the proposed mitigation is viable over the long-term. Include a timeline for reporting progress and an intervention/remediation plan to be implemented if the mitigation fails.

Applicant signature

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Date (mm/dd/yyyy): 4/27/2026

Signature: 