State Project 2908-31

Antidegradation Assessment

April 2026

Prepared by:

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Prepared for:

DEPARTMENT OF TRANSPORTATION

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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

Table 1. Applicant Information

Field	Information
Applicant Name	Rachel Miller, Minnesota Department of Transportation, District 2
Project Name	State Project (SP) 2908-31
USACE ID Number	MVP-2024-00902-SRK
USACE PM	Sean Kelly
Date Submitted	April 20, 2026

1. Environmental Review

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

Table 2. Environmental Review

Field	Information
Are any of the following required for this project? a. Environmental Assessment Worksheet (EAW) b. Environmental Impact Statement (EIS) c. Environmental Assessment (EA) d. Categorical Exclusion (CE)	CE
If yes, include the date it was completed and the decision:	January 21, 2026

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. Minn. R. 7050.0280, subp. 2

1. No-build Alternative: this alternative would make no changes to Trunk Highway (TH) 200 between County State Aid Highway (CSAH) 39 in Hubbard County, MN and TH 371 in Cass County, MN. There would be no associated construction costs and no direct impacts to the water quality of nearby surface waters; however, there would also be no improvements to vehicle safety, the usable life of the pavement would remain low, shoulder widths would remain below MnDOT standards, drainage facilities and culverts would remain in poor condition, and pedestrian ramps and sidewalks would remain non-compliant with the Americans with Disabilities Act (ADA). This alternative would not meet the purpose and need identified in the CE; therefore, MnDOT rejected this as a viable alternative.
2. Gradual fill slopes: this alternative would include less steep fill slopes of 1:5 or greater. This would require more fill material than the preferred alternative below which would increase construction costs. Operation and maintenance costs would be comparable to the preferred alternative. Gradual fill slopes increase vehicle safety by making it easier

for drivers to recover their vehicle if it leaves the roadway. However, less steep fill slopes would require more fill to be placed in surrounding wetlands and other surface waters, increasing project-related impacts to water quality. This alternative would have required 10.98 acres of permanent impacts to wetlands across the entire project corridor. Therefore, MnDOT rejected this as a viable alternative.

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. Minn. R. 7050.0280, subp.2

The preferred alternative would include a 8.2-mile full depth reverse reclamation and paving of Trunk Highway (TH) 200 between County State Aid Highway (CSAH) 39 in Hubbard County, MN and TH 371 in Cass County, MN. MPCA is the certifying authority for the 5.7-mile portion of the project between CSAH 39 and the western border of the Leech Lake Reservation near CSAH 38. There would also be upgrades to drainage and culvert infrastructure (see Table 3), shoulder widening (see Table 4), reconstruction of TH 200 within the city of Laporte, MN, upgrades to pedestrian infrastructure, and turn lane installation. This project would increase vehicle safety, increase the usable life of the pavement, bring shoulder widths to MnDOT standards, mitigate drainage issues in the city of Laporte and along the project corridor, and improve pedestrian connectivity as well as ADA compliance of sidewalks in the city of Laporte. This alternative would include 1:4 fill slopes along the upgraded roadway. The steeper fill slopes would require less construction material than more gradual fill slopes, reducing project cost and minimizing wetland impact(s). Operation and maintenance costs would be comparable to more gradual fill slopes. While the preferred alternative would result in fill placement in surrounding wetlands and surface waters, the 1:4 fill slopes would have less impact than more gradual fill slopes. This alternative would only require 9.88 acres of permanent impacts to wetlands across the entire project corridor. This steeper fill slope alternative meets the purpose and need identified in the CE while mitigating some of the impacts to surface water quality along the corridor.

Table 3. Upgrades to Drainage and Culvert Infrastructure[1]

Ditches Proposed for Cleaning	Culvert Replacements	Culvert Extensions	Culverts Proposed for Lining	New Culverts Proposed	Culverts Proposed for Cleaning
1	29	3	4	8	2

[1] This table only reflects project upgrades to drainage and culvert infrastructure where the MPCA is the certifying authority.

Table 4. Existing and Proposed Shoulder Widths

Existing Paved Shoulder Width (ft)	Required/Proposed Paved Shoulder Width (ft)	Existing Usable Shoulder Width (ft)	Required/Proposed Usable Shoulder Width (ft)
1-2	2	3.5-5.3	6

4. Water Quality Parameters of Concern

List the water quality parameters of concern for the project.

Examples: Total Suspended Solids (TSS), Dissolved Oxygen (DO), Mercury (Hg), Temperature, PCBs, etc.

a. TSS
b. Volume of runoff
c. Velocity of runoff
d. Mercury in fish tissue
e. Escherichia coli

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).

a. *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.*
b. *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:

a. *Identify streams, rivers, 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. 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.

b. *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.*

c. *Streams and rivers*

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

d. *Lakes and wetlands*

i. *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 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.*

e. *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).*

Table 5. Existing Uses and Water Quality

Waterbody Identification Number	Name	Use Classification(s)	Existing use (highest quality attained from November 28, 1975 to present)	Existing water quality
07010102-511	Kabekona River	1B, 2Ag, 3, 4A, 4B, 5, 6	Drinking water (with approved disinfection)	Not always suitable for swimming and wading due to high bacteria levels caused by the presence of human or animal waste in the water. Available data indicate a thriving community of fish and other aquatic organisms.
07010102-601	N/A	1B, 2Ag, 3, 4A, 4B, 5, 6	Drinking water (with approved disinfection)	Likely not always suitable for swimming and wading due to high bacteria levels caused by

Waterbody Identification Number	Name	Use Classification(s)	Existing use (highest quality attained from November 28, 1975 to present)	Existing water quality
				the presence of human or animal waste in nearby reference waters. Available data in reference waters indicate a thriving community of fish and other aquatic organisms.
29-0061-00	Garfield Lake	2B, 3, 4A, 4B, 5, 6	Aquatic life and recreation	Suitable for swimming and wading, with good clarity and low algae levels throughout the open water season. Concentrations of Mercury in fish tissue exceed the standard; fish and aquatic organisms are not always suitable for consumption by humans or wildlife.
29-0057-00	N/A	2B, 3, 4A, 4B, 5, 6	Aquatic life and recreation	Likely suitable for swimming and wading, based on good clarity and low algae levels in nearby reference waters throughout the open water season.
07010102-529	N/A	2Bg, 3, 4A, 4B, 5, 6	Aquatic life and recreation	Likely not always suitable for swimming and wading due to high bacteria levels caused by the presence of human or animal waste in nearby reference waters. Available data in reference waters indicate a thriving community of fish and other aquatic organisms.
29-0056-00	N/A	2B, 3, 4A, 4B, 5, 6	Aquatic life and recreation	Likely suitable for swimming and wading, based on good clarity and low algae levels in

Waterbody Identification Number	Name	Use Classification(s)	Existing use (highest quality attained from November 28, 1975 to present)	Existing water quality
				nearby reference waters throughout the open water season.
29-0059-00	Horseshoe Lake	2B, 3, 4A, 4B, 5, 6	Aquatic life and recreation	Suitable for swimming and wading, with good clarity and low algae levels throughout the open water season.
29-0060-00	Oak Lake	2B, 3, 4A, 4B, 5, 6	Aquatic life and recreation	Likely suitable for swimming and wading, based on good clarity and low algae levels in nearby reference waters throughout the open water season.
07010102-528	Kabekona River	2Bg, 3, 4A, 4B, 5, 6	Aquatic life and recreation	Suitable for swimming and wading, with low bacteria levels throughout the open water season.
29-0075-00	Kabekona Lake	1B, 2A, 3, 4A, 4B, 5, 6	Drinking water (with approved disinfection)	Suitable for swimming and wading, with good clarity and low algae levels throughout the open water season. Concentrations of Mercury in fish tissue exceed the standard; fish and aquatic organisms are not always suitable for consumption by humans or wildlife.
29-0374-00	N/A	2B, 3, 4A, 4B, 5, 6	Aquatic life and recreation	Likely suitable for swimming and wading, based on good clarity and low algae levels in nearby reference waters throughout the open water season.

Waterbody Identification Number	Name	Use Classification(s)	Existing use (highest quality attained from November 28, 1975 to present)	Existing water quality
29-0048-00	Benedict Lake	1B, 2A, 3, 4A, 4B, 5, 6;	Drinking water (with approved disinfection)	Suitable for swimming and wading, with good clarity and low algae levels throughout the open water season. Concentrations of Mercury in fish tissue exceed the standard; fish and aquatic organisms are not always suitable for consumption by humans or wildlife.
29-0372-00	N/A	2B, 3, 4A, 4B, 5, 6	Aquatic life and recreation	Likely suitable for swimming and wading, based on good clarity and low algae levels in nearby reference waters throughout the open water season.
07010102-609	N/A	2Bg, 3, 4A, 4B, 5, 6	Aquatic life and recreation	Likely not always suitable for swimming and wading due to high bacteria levels caused by the presence of human or animal waste in nearby reference waters. Available data in reference waters indicate a thriving community of fish and other aquatic organisms.
11-0203-02	Leech (Kabekona Bay)	2B, 3, 4A, 4B, 5, 6	Aquatic Life and Recreation	Suitable for swimming and wading, with good clarity and low algae levels throughout the open water season. Concentrations of Mercury in fish tissue exceed the standard; fish and aquatic organisms are not always suitable for consumption by humans or wildlife.

Waterbody Identification Number	Name	Use Classification(s)	Existing use (highest quality attained from November 28, 1975 to present)	Existing water quality
11-0203-01	Leech (Main Basin)	2B, 3, 4A, 4B, 5, 6	Aquatic life and recreation	Suitable for swimming and wading, with good clarity and low algae levels throughout the open water season. Concentrations of Mercury in fish tissue exceed the standard; fish and aquatic organisms are not always suitable for consumption by humans or wildlife.
N/A	Wetland 1	2D, 3, 4A, 4B, 5, 6	Wetland	A wetland delineation indicated a diverse community of wetland flora and fauna.
N/A	Wetland 2	2D, 3, 4A, 4B, 5, 6	Wetland	A wetland delineation indicated a diverse community of wetland flora and fauna.
N/A	Wetland 3	2D, 3, 4A, 4B, 5, 6	Wetland	A wetland delineation indicated a diverse community of wetland flora and fauna.
N/A	Wetland 4	2D, 3, 4A, 4B, 5, 6	Wetland	A wetland delineation indicated a diverse community of wetland flora and fauna.
N/A	Wetland 5	2D, 3, 4A, 4B, 5, 6	Wetland	A wetland delineation indicated a diverse community of wetland flora and fauna.
N/A	Wetland 6	2D, 3, 4A, 4B, 5, 6	Wetland	A wetland delineation indicated a diverse community of wetland flora and fauna.
N/A	Wetland 7	2D, 3, 4A, 4B, 5, 6	Wetland	A wetland delineation indicated a diverse community of wetland flora and fauna.

Waterbody Identification Number	Name	Use Classification(s)	Existing use (highest quality attained from November 28, 1975 to present)	Existing water quality
N/A	Wetland 8	2D, 3, 4A, 4B, 5, 6	Wetland	A wetland delineation indicated a diverse community of wetland flora and fauna.
N/A	Wetland 9	2D, 3, 4A, 4B, 5, 6	Wetland	A wetland delineation indicated a diverse community of wetland flora and fauna.
N/A	Wetland 10	2D, 3, 4A, 4B, 5, 6	Wetland	A wetland delineation indicated a diverse community of wetland flora and fauna.
N/A	Wetland 11	2D, 3, 4A, 4B, 5, 6	Wetland	A wetland delineation indicated a diverse community of wetland flora and fauna.
N/A	Wetland 12	2D, 3, 4A, 4B, 5, 6	Wetland	A wetland delineation indicated a diverse community of wetland flora and fauna.
N/A	Wetland 13	2D, 3, 4A, 4B, 5, 6	Wetland	A wetland delineation indicated a diverse community of wetland flora and fauna.
N/A	Wetland 14	2D, 3, 4A, 4B, 5, 6	Wetland	A wetland delineation indicated a diverse community of wetland flora and fauna.
N/A	Wetland 15	2D, 3, 4A, 4B, 5, 6	Wetland	A wetland delineation indicated a diverse community of wetland flora and fauna.
N/A	Wetland 16	2D, 3, 4A, 4B, 5, 6	Wetland	A wetland delineation indicated a diverse community of wetland flora and fauna.
N/A	Wetland 17	2D, 3, 4A, 4B, 5, 6	Wetland	A wetland delineation indicated a diverse community of wetland flora and fauna.

Waterbody Identification Number	Name	Use Classification(s)	Existing use (highest quality attained from November 28, 1975 to present)	Existing water quality
N/A	Wetland 18	2D, 3, 4A, 4B, 5, 6	Wetland	A wetland delineation indicated a diverse community of wetland flora and fauna.
N/A	Wetland 19	2D, 3, 4A, 4B, 5, 6	Wetland	A wetland delineation indicated a diverse community of wetland flora and fauna.
N/A	Wetland 20	2D, 3, 4A, 4B, 5, 6	Wetland	A wetland delineation indicated a diverse community of wetland flora and fauna.
N/A	Wetland 21	2D, 3, 4A, 4B, 5, 6	Wetland	A wetland delineation indicated a diverse community of wetland flora and fauna.
N/A	Wetland 22	2D, 3, 4A, 4B, 5, 6	Wetland	A wetland delineation indicated a diverse community of wetland flora and fauna.
N/A	Wetland 23	2D, 3, 4A, 4B, 5, 6	Wetland	A wetland delineation indicated a diverse community of wetland flora and fauna.
N/A	Wetland 24	2D, 3, 4A, 4B, 5, 6	Wetland	A wetland delineation indicated a diverse community of wetland flora and fauna.
N/A	Wetland 38	2D, 3, 4A, 4B, 5, 6	Wetland	A wetland delineation indicated a diverse community of wetland flora and fauna.
N/A	Wet Ditch 1	6	Roadside ditch	A wetland delineation indicated a low quality aquatic plant community and low quality habitat for local wildlife.
N/A	Wet Ditch 2	6	Roadside ditch	A wetland delineation indicated a low quality aquatic plant

Waterbody Identification Number	Name	Use Classification(s)	Existing use (highest quality attained from November 28, 1975 to present)	Existing water quality
				community and low quality habitat for local wildlife.
N/A	Wet Ditch 3	6	Roadside ditch	A wetland delineation indicated a low quality aquatic plant community and low quality habitat for local wildlife.
N/A	Wet Ditch 4	6	Roadside ditch	A wetland delineation indicated a low quality aquatic plant community and low quality habitat for local wildlife.
N/A	Intermittent Stream 1	2Bg, 3, 4A, 4B, 5, 6	Aquatic life and recreation	Likely not always suitable for swimming and wading due to high bacteria levels caused by the presence of human or animal waste in nearby reference waters. Available data in reference waters indicate a thriving community of fish and other aquatic organisms.

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).

Table 6. Anticipated Water Quality

Waterbody Identification Number	Name	Anticipated Water Quality
07010102-511	Kabekona River	No permanent changes to the water quality of this surface water are anticipated.

Waterbody Identification Number	Name	Anticipated Water Quality
07010102-601	N/A	No permanent changes to the water quality of this surface water are anticipated.
29-0061-00	Garfield Lake	No permanent changes to the water quality of this surface water are anticipated.
29-0057-00	N/A	No permanent changes to the water quality of this surface water are anticipated.
07010102-529	N/A	No permanent changes to the water quality of this surface water are anticipated.
29-0056-00	N/A	No permanent changes to the water quality of this surface water are anticipated.
29-0059-00	Horseshoe Lake	This project proposes the discharge of fill and temporary construction-related impacts in this surface water. Its existing uses of aquatic life and recreation are not anticipated to be affected.
29-0060-00	Oak Lake	No permanent changes to the water quality of this surface water are anticipated.
07010102-528	Kabekona River	No permanent changes to the water quality of this surface water are anticipated.
29-0075-00	Kabekona Lake	No permanent changes to the water quality of this surface water are anticipated.
29-0374-00	N/A	No permanent changes to the water quality of this surface water are anticipated.
29-0048-00	Benedict Lake	No permanent changes to the water quality of this surface water are anticipated.
29-0372-00	N/A	No permanent changes to the water quality of this surface water are anticipated.
07010102-609	N/A	No permanent changes to the water quality of this surface water are anticipated.
11-0203-02	Leech (Kabekona Bay)	No permanent changes to the water quality of this surface water are anticipated.

Waterbody Identification Number	Name	Anticipated Water Quality
11-0203-01	Leech (Main Basin)	No permanent changes to the water quality of this surface water are anticipated.
N/A	Wetland 1	This project proposes the discharge of fill, excavation, and temporary construction-related impacts in this surface water. This is anticipated to reduce the size of this wetland.
N/A	Wetland 2	This project proposes the discharge of fill, excavation, and temporary construction-related impacts in this surface water. This is anticipated to reduce the size of this wetland.
N/A	Wetland 3	This project proposes the discharge of fill, excavation, and temporary construction-related impacts in this surface water. This is anticipated to reduce the size of this wetland.
N/A	Wetland 4	This project proposes the discharge of fill and temporary construction-related impacts in this surface water. This is anticipated to reduce the size of this wetland.
N/A	Wetland 5	This project proposes the discharge of fill and temporary construction-related impacts in this surface water. This is anticipated to reduce the size of this wetland.
N/A	Wetland 6	This project proposes temporary construction-related impacts in this surface water. This is not anticipated to affect its existing use as a wetland.
N/A	Wetland 7	This project proposes the discharge of fill and temporary construction-related impacts in this surface water. This is anticipated to reduce the size of this wetland.
N/A	Wetland 8	This project proposes the discharge of fill and temporary construction-related impacts in this surface water. This is anticipated to reduce the size of this wetland.
N/A	Wetland 9	This project proposes the discharge of fill, excavation, and temporary construction-related impacts in this surface water. This is anticipated to reduce the size of this wetland.
N/A	Wetland 10	This project proposes the discharge of fill, excavation, and temporary construction-related impacts in this surface water. This is anticipated to reduce the size of this wetland.

Waterbody Identification Number	Name	Anticipated Water Quality
N/A	Wetland 11	This project proposes the discharge of fill, excavation, and temporary construction-related impacts in this surface water. This is anticipated to reduce the size of this wetland.
N/A	Wetland 12	This project proposes the discharge of fill, excavation, and temporary construction-related impacts in this surface water. This is anticipated to reduce the size of this wetland.
N/A	Wetland 13	This project proposes the discharge of fill, excavation, and temporary construction-related impacts in this surface water. This is anticipated to reduce the size of this wetland.
N/A	Wetland 14	This project proposes the discharge of fill, excavation, and temporary construction-related impacts in this surface water. This is anticipated to reduce the size of this wetland.
N/A	Wetland 15	This project proposes the discharge of fill, excavation, and temporary construction-related impacts in this surface water. This is anticipated to reduce the size of this wetland.
N/A	Wetland 16	This project proposes the discharge of fill and excavation in this surface water. This is anticipated to reduce the size of this wetland.
N/A	Wetland 17	This project proposes the discharge of fill, excavation, and temporary construction-related impacts in this surface water. This is anticipated to reduce the size of this wetland.
N/A	Wetland 18	This project proposes the discharge of fill, excavation, and temporary construction-related impacts in this surface water. This is anticipated to reduce the size of this wetland.
N/A	Wetland 19	This project proposes the discharge of fill and excavation in this surface water. This is anticipated to reduce the size of this wetland.
N/A	Wetland 20	This project proposes the discharge of fill, excavation, and temporary construction-related impacts in this surface water. This is anticipated to reduce the size of this wetland.
N/A	Wetland 21	This project proposes the discharge of fill, excavation, and temporary construction-related impacts in this surface water. This is anticipated to reduce the size of this wetland.

Waterbody Identification Number	Name	Anticipated Water Quality
N/A	Wetland 22	This project proposes the discharge of fill, excavation, and temporary construction-related impacts in this surface water. This is anticipated to reduce the size of this wetland.
N/A	Wetland 23	This project proposes the discharge of fill, excavation, and temporary construction-related impacts in this surface water. This is anticipated to reduce the size of this wetland.
N/A	Wetland 24	This project proposes the discharge of fill, excavation, and temporary construction-related impacts in this surface water. This is anticipated to reduce the size of this wetland.
N/A	Wetland 38	This project proposes excavation and temporary construction-related impacts in this surface water. This is not anticipated to impact its existing use as a wetland.
N/A	Wet Ditch 1	This project proposes the discharge of fill and temporary construction-related impacts in this surface water. This is anticipated to reduce the size of this low quality habitat for plants and wildlife.
N/A	Wet Ditch 2	This project proposes the discharge of fill in this surface water. This is anticipated to convert this low-quality aquatic habitat to upland.
N/A	Wet Ditch 3	This project proposes the discharge of fill and excavation in this surface water. This is anticipated to reduce the size of this low quality habitat for plants and wildlife.
N/A	Wet Ditch 4	This project proposes the discharge of fill and excavation in this surface water. This is anticipated to reduce the size of this low quality habitat for plants and wildlife.
N/A	Intermittent Stream 1	This project proposes the discharge of fill, excavation, and temporary construction-related impacts in this surface water. Its existing uses of aquatic life and recreation are not anticipated to be affected.

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. 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.

Table 7. Impairments and TMDL Statuses

Waterbody Identification Number	Name	Impairment	TMDL Completed?
07010102-511	Kabekona River	Escherichia coli	No
07010102-601	N/A	N/A	N/A
29-0061-00	Garfield Lake	Mercury in fish tissue	No
29-0057-00	N/A	N/A	N/A
07010102-529	N/A	N/A	N/A
29-0056-00	N/A	N/A	N/A
29-0059-00	Horseshoe Lake	N/A	N/A
29-0060-00	Oak Lake	N/A	N/A
07010102-528	Kabekona River	N/A	N/A
29-0075-00	Kabekona Lake	Mercury in fish tissue	No
29-0374-00	N/A	N/A	N/A
29-0048-00	Benedict Lake	Mercury in fish tissue	No
29-0372-00	N/A	N/A	N/A
07010102-609	N/A	N/A	N/A
11-0203-02	Leech (Kabekona Bay)	Mercury in fish tissue	No
11-0203-01	Leech (Main Basin)	Mercury in fish tissue	No
N/A	Wetland 1	N/A	N/A
N/A	Wetland 2	N/A	N/A
N/A	Wetland 3	N/A	N/A

Waterbody Identification Number	Name	Impairment	TMDL Completed?
N/A	Wetland 4	N/A	N/A
N/A	Wetland 5	N/A	N/A
N/A	Wetland 6	N/A	N/A
N/A	Wetland 7	N/A	N/A
N/A	Wetland 8	N/A	N/A
N/A	Wetland 9	N/A	N/A
N/A	Wetland 10	N/A	N/A
N/A	Wetland 11	N/A	N/A
N/A	Wetland 12	N/A	N/A
N/A	Wetland 13	N/A	N/A
N/A	Wetland 14	N/A	N/A
N/A	Wetland 15	N/A	N/A
N/A	Wetland 16	N/A	N/A
N/A	Wetland 17	N/A	N/A
N/A	Wetland 18	N/A	N/A
N/A	Wetland 19	N/A	N/A
N/A	Wetland 20	N/A	N/A
N/A	Wetland 21	N/A	N/A
N/A	Wetland 22	N/A	N/A
N/A	Wetland 23	N/A	N/A
N/A	Wetland 24	N/A	N/A
N/A	Wetland 38	N/A	N/A
N/A	Wet Ditch 1	N/A	N/A
N/A	Wet Ditch 2	N/A	N/A

Waterbody Identification Number	Name	Impairment	TMDL Completed?
N/A	Wet Ditch 3	N/A	N/A
N/A	Wet Ditch 4	N/A	N/A
N/A	Intermittent Stream 1	N/A	N/A

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 and the extent of the alteration, also state if the alteration will be permanent (longer than one year) or temporary.

Table 8. Physical Alterations

Waterbody Identification Number	Name	Physical Alteration	Extent of Alteration	Temporary or Permanent
07010102-511	Kabekona River	N/A	N/A	N/A
07010102-601	N/A	N/A	N/A	N/A
29-0061-00	Garfield Lake	N/A	N/A	N/A
29-0057-00	N/A	N/A	N/A	N/A
07010102-529	N/A	N/A	N/A	N/A
29-0056-00	N/A	N/A	N/A	N/A
29-0059-00	Horseshoe Lake	Discharge of fill, construction-related impacts	21 sq ft, 0.05 ac	Permanent, temporary
29-0060-00	Oak Lake	N/A	N/A	N/A
07010102-528	Kabekona River	N/A	N/A	N/A
29-0075-00	Kabekona Lake	N/A	N/A	N/A
29-0374-00	N/A	N/A	N/A	N/A

Waterbody Identification Number	Name	Physical Alteration	Extent of Alteration	Temporary or Permanent
29-0048-00	Benedict Lake	N/A	N/A	N/A
29-0372-00	N/A	N/A	N/A	N/A
07010102-609	N/A	N/A	N/A	N/A
11-0203-02	Leech (Kabekona Bay)	N/A	N/A	N/A
11-0203-01	Leech (Main Basin)	N/A	N/A	N/A
N/A	Wetland 1	Discharge of fill, excavation, construction-related impacts	0.42 ac, 0.02 ac, 0.83 ac	Permanent, permanent, temporary
N/A	Wetland 2	Discharge of fill, excavation, construction-related impacts	0.16 ac, 0.19 ac, 104 sq ft	Permanent, permanent, temporary
N/A	Wetland 3	Discharge of fill, excavation, construction-related impacts	0.21 ac, 0.55 ac, 0.31 ac	Permanent, permanent, temporary
N/A	Wetland 4	Discharge of fill, construction-related impacts	0.10 ac, 0.07 ac	Permanent, temporary
N/A	Wetland 5	Discharge of fill, construction-related impacts	0.11 ac, 0.19 ac	Permanent, temporary
N/A	Wetland 6	Construction-related impacts	0.79 ac	Temporary
N/A	Wetland 7	Discharge of fill, construction-related impacts	0.40 ac, 0.21 ac	Permanent, temporary

Waterbody Identification Number	Name	Physical Alteration	Extent of Alteration	Temporary or Permanent
N/A	Wetland 8	Discharge of fill, construction-related impacts	0.21 ac, 0.09 ac	Permanent, temporary
N/A	Wetland 9	Discharge of fill, excavation, construction-related impacts	0.30 ac, 0.02 ac, 0.32 ac	Permanent, permanent, temporary
N/A	Wetland 10	Discharge of fill, excavation, construction-related impacts	0.08 ac, 0.06 ac, 0.04 ac	Permanent, permanent, temporary
N/A	Wetland 11	Discharge of fill, excavation, construction-related impacts	0.67 ac, 0.67 ac, 0.62 ac	Permanent, permanent, temporary
N/A	Wetland 12	Discharge of fill, excavation, construction-related impacts	0.43 ac, 0.17 ac, 0.41 ac	Permanent, permanent, temporary
N/A	Wetland 13	Discharge of fill, excavation, construction-related impacts	0.25 ac, 0.33 ac, 0.30 ac	Permanent, permanent, temporary
N/A	Wetland 14	Discharge of fill, excavation, construction-related impacts	0.23 ac, 0.27 ac, 0.15 ac	Permanent, permanent, temporary
N/A	Wetland 15	Discharge of fill, excavation, construction-related impact	0.16 ac, 328 sq ft, 0.26 ac	Permanent, permanent, temporary
N/A	Wetland 16	Discharge of fill, excavation	0.03 ac, 0.03 ac	Permanent, permanent

Waterbody Identification Number	Name	Physical Alteration	Extent of Alteration	Temporary or Permanent
N/A	Wetland 17	Discharge of fill, excavation, construction-related impacts	0.34 ac, 0.45 ac, 0.14 ac	Permanent, permanent, temporary
N/A	Wetland 18	Discharge of fill, excavation, construction-related impact	407 sq ft, 0.03 ac, 0.10 ac	Permanent, permanent, temporary
N/A	Wetland 19	Discharge of fill, excavation	0.04 ac, 0.03 ac	Permanent, permanent
N/A	Wetland 20	Discharge of fill, excavation, construction-related impact	0.05 ac, 0.02 ac, 0.03 ac	Permanent, permanent, temporary
N/A	Wetland 21	Discharge of fill, excavation, construction-related impact	0.06 ac, 0.07 ac, 0.05 ac	Permanent, permanent, temporary
N/A	Wetland 22	Discharge of fill, excavation, construction-related impact	0.02 ac, 0.09 ac, 0.05 ac	Permanent, permanent, temporary
N/A	Wetland 23	Discharge of fill, excavation, construction-related impact	0.15 ac, 0.23 ac, 0.11 ac	Permanent, permanent, temporary
N/A	Wetland 24	Discharge of fill, excavation, construction-related impact	189 sq ft, 0.10 ac, 0.08 ac	Permanent, permanent, temporary
N/A	Wetland 38	Excavation, construction-related impact	0.08 ac, 0.32 ac	Permanent, temporary

Waterbody Identification Number	Name	Physical Alteration	Extent of Alteration	Temporary or Permanent
N/A	Wet Ditch 1	Discharge of fill, construction-related impact	0.09 ac, 347 sq ft	Permanent, temporary
N/A	Wet Ditch 2	Discharge of fill	0.18 ac	Permanent
N/A	Wet Ditch 3	Discharge of fill, excavation	0.10 ac, 0.01 ac	Permanent, permanent
N/A	Wet Ditch 4	Discharge of fill, excavation	0.07 ac, 30 sq ft	Permanent, permanent
N/A	Intermittent Stream 1	Discharge of fill, excavation, construction-related impact	61 linear ft (0.01 ac), 25 linear ft (182 sq ft), 24 linear ft (169 sq ft)	Permanent, permanent, temporary

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 timing, water quality (including temperature), aquatic species health or population, vegetation or macroinvertebrate (bug) populations, etc.

The proposed discharge of fill within wetlands along the project corridor will reduce the size of available wetland habitat for flora and fauna directly adjacent to TH 200; however, given the high concentration of wetlands in the vicinity, this project is not anticipated to significantly reduce available wetland habitat for wildlife or the quantity of wetland vegetation in the region.

Similarly, the discharge of fill in Horseshoe Lake and Intermittent Stream 1 is minimal and not anticipated to affect their uses for aquatic life or aquatic recreation.

There will be an increased volume of runoff to areas adjacent to the roadway due to increases in impervious surface associated with shoulder widening. Culverts, storm sewer pipes, catch basins, ponds, infiltration/filtration basins, permeable ditch blocks and overflow devices have all been specifically designed to conform with MnDOT standards and MPCA requirements to mitigate impacts from this increased runoff volume to the extent feasible.

10. Loading and Degradation to Surface Waters

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

Example 1: Filling of a wetland that causes another wetland to backup and inundate, (the inundated wetland can be on or off the project site).

Example 2: A discharge from the project site that increases flow to another surface water on or off the project site.

Example 3: Impervious surface increases in a subwatershed to the extent water quality becomes degraded.

Discharge of Fill

The preferred alternative would result in 21 square feet of permanent fill to Horseshoe Lake, 0.01 acres (61 linear feet) of permanent fill to Intermittent Stream 1, 0.42 acres of permanent fill to wet ditches, and 4.42 acres of permanent fill to wetlands along the portion of the project where the MPCA is the certifying authority.

Excavation

The preferred alternative would result in 182 square feet (25 linear feet) of excavation within Intermittent Stream 1, 0.01 acres of excavation within wet ditches, and 3.42 acres of excavation within wetlands along the portion of the project where the MPCA is the certifying authority.

Any excess material resulting from excavation would be the responsibility of the contractor. Disposal of these materials will be in accordance with a disposal plan that complies with all applicable environmental regulations and, permit requirements. Excess materials and debris will not be placed in wetlands or floodplains.

Temporary Construction-related Impacts

The preferred alternative would result in 0.05 acres of temporary construction-related impacts to Horseshoe Lake, 169 square feet (24 linear feet) of temporary construction-related impacts to Intermittent Stream 1, 347 square feet of temporary construction-related impacts to Wet Ditch 1, and 5.44 acres of temporary construction-related impacts to wetlands along the portion of the project where the MPCA is the certifying authority.

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; 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)

The city of Laporte, MN has almost no pedestrian facilities and only two existing curb ramps that are not compliant with the ADA. This project would include the construction of new ADA compliant curb ramps, sidewalks, and pedestrian crossings. These new amenities would improve the safety and mobility of all pedestrians in the city.

A drainage issue has also become apparent in the city of Laporte adjacent to TH 200. Due to the lack of curbs and gutters, erosion has occurred adjacent to the highway leading to ponding, sediment discharge, and icy road conditions during cold weather. This project would include upgrades to drainage infrastructure in the city that would mitigate the visually unappealing ponding and resulting discharge. These upgrades would also improve motorist safety by preventing icy conditions caused by inadequate drainage infrastructure.

Deteriorating hydraulic infrastructure along the project corridor also poses a safety risk to motorists. Culvert failure can result in roadway collapse, a significant hazard for motorists. This project would include upgrades to this hydraulic infrastructure that improve drainage throughout the corridor while also increasing the service life of culverts and mitigating safety risk to motorists.

The existing roadway is out of compliance with current MnDOT standards for minimum shoulder widths, vertical sightlines, and hazards within the clear zone. This project will address these compliance concerns which currently pose a threat to the safety of motorists.

The existing roadway is in poor condition. This project would extend the service life of the roadway and ensure motorists are able to comfortably and safely travel along TH 200 for years to come.

12. Description of the Compensatory Mitigation Plan

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.

See Table 8.

Describe mitigation proposed for permanent surface water impacts.

Wetland mitigation for permanent wetland impacts will be provided through existing MnDOT wetland bank credits that satisfy both Section 404 of the Clean Water Act and Minnesota Wetland Conservation Act requirements. The wetland bank credits will be for wetlands also located within Bank Service Area 5. These credits will be purchased at a 1:1 ratio according to the WCA. The

mitigation will occur through coordination between MnDOT's Office of Environmental Stewardship (OES) and the project's U.S. Army Corps of Engineers (USACE) liaison.

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).

OES and USACE will coordinate to ensure purchased wetland bank credits constitute an appropriate replacement for the permanently impacted wetlands. The water quality of surface waters adjacent to the project is not anticipated to change.

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.

Since the proposed mitigation is through the purchase of offsite wetland bank credits, ongoing monitoring and maintenance activities do not apply.

Applicant Signature

Name	Rachel Miller, MnDOT District 2	Title	District Water Resources Engineer
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Signature	Rachel Miller Digitally signed by Rachel Miller DN: CN=Rachel Miller Date: 2026.04.21 12:50:07-05'00'	Date	