

December 17, 2002

Sam Griffith, City Administrator  
City of Sandstone  
119 Fourth Street, P.O. Box 641  
Sandstone, Minnesota 55072

Subject: Supplemental Response  
Pine County SWCD Wetland Comments  
Proposed Motor Sports Park  
Sandstone, Minnesota  
PEC Project No. 2002-052

Dear Sam:

This letter is in response to wetland-related follow up comments regarding the proposed Sandstone Motor Sports Park that were submitted on December 12, 2002 by the Pine County SWCD. Peterson Environmental Consulting, Inc. (PEC) field reviewed all of these areas on December 14, 2002 and has prepared the following responses to the SWCD's follow up comments. **Figure 1** illustrates the respective locations of the wetlands delineated by PEC in August of 2002 and the areas being questioned by the SWCD.

#### Area 1

The SWCD considered Area 1 an area of concern because it was a "forested depression". Upon further review PEC has identified an approximate 1,058 square foot (0.02 acre) temporarily inundated palustrine emergent wetland just east of the location cited by the SWCD. The size of this depression was determined using a global positioning system (GPS) unit rated at sub-meter accuracy. This very small depression is located in a very dense stand of aspen and was overlooked in the original delineation. The dark pattern circled on the aerial photograph by the SWCD is actually a small stand of pine trees. As shown in **Figure 2**, this basin is essentially a mudflat area that a few widely scattered clumps of tussock sedge (*Carex stricta*). Area 1 is far enough east that it would not be affected by grading activities for the proposed motor sports park.

#### Area 2

Area 2 is an approximately 1,933 square foot (0.04 acre) area at the north end of Basin 7. This area is predominantly vegetated with lake sedge (*Carex lacustris*) and speckled alder (*Alnus rugosa*)(see Figure 2). This area apparently was overlooked due to the very dense vegetation. We concur that this small area should be added to Basin 7. The plans for the proposed motor

sports park avoid impacts to Basin 7. A minor adjustment to the boundaries of the turfed pro pits north of Basin 7 will allow impacts to Area 2 to be avoided as well.

### **Area 3**

Area 3 is approximately 13,550 square feet (0.31 acre) in size and lies along the west side of the airport runway. Area 3 would be filled during grading of the proposed motor sports park facility. This area appears to be an excess material disposal area from grading activities associated with the construction of the airport. It is vegetated with a mixture of upland and wetland plants but lake sedge (*Carex lacustris*) and sandbar willow (*Salix exigua*) are predominant (see Figure 2). Area 3 lies on a slope and has no apparent source of hydrology. If Area 3 is wetland at all, it appears to be of artificial origin and should be covered by the Wetland Conservation Act incidental wetland exemption (see Minn. Rules 8420.0122 Subpart 5). If the motor sports park project moves forward, the artificial origin of this area can be confirmed by a soil investigation during the Spring of 2003.

### **Area 4**

Area 4 is nearly identical in character to Area 3 and appears to be the result of airport construction (see Figure 2). This area is about 6,000 square feet (0.14 acre) in size. Area 4 would be filled during grading of the proposed motor sports park facility. Again, if it is wetland at all, we expect that it will be covered by the WCA incidental wetland exemption.

### **Area 5**

Area 5 is similar in character to Areas 3 and 4 (**Figure 3**) and does not appear to be jurisdictional wetland, since it lacks a predominance of hydrophytic plants. It is a slight depression left by grading of the eastern slope of the airport runway and is about 4,232 square feet (0.10 acre) in size. The ground layer is dominated by Kentucky bluegrass (*Poa pratensis*) and Canada goldenrod (*Solidago canadensis*), both of which are upland plants. There is a shrub layer of sandbar willow which, while an obligate wetland plant, is favored by disturbance and commonly grows on disturbed uplands. Area 5 would be filled during grading of the proposed motor sports park facility. If Area 5 is wetland at all (which it does not appear to be), it would almost certainly be considered incidental wetland and exempt from regulation.

### **Area 6**

A very small intermittent drainageway connects Wetland 5 to Wetland 8 (see Figure 3). We did not delineate the drainageway itself, which has sufficient gradient to preclude jurisdictional hydrology. The only possible exception is an approximate 1,890 square foot (0.04 acre) depression immediately upgradient from the culvert under the railroad tracks (see Figure 3). This small area may be a remnant of Basin 8 that was severed when the railroad tracks were built. If jurisdictional, this area would be considered a saturated palustrine emergent wetland

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(PEMB; Circular 39 Type 2 wet meadow). While the outlet pipe from the southeastern stormwater pond would be directed to Area 6, no filling would occur in this area.

#### **Area 7**

We searched for Area 7 but could find nothing resembling a jurisdictional wetland in or around the location circled by the SWCD. We do not believe there are any jurisdictional wetlands anywhere in the vicinity of area identified by the SWCD. As this area is proposed for wetland mitigation, if there was a wetland in the vicinity it would incur no adverse impacts.

#### **Revised Impact Summary**

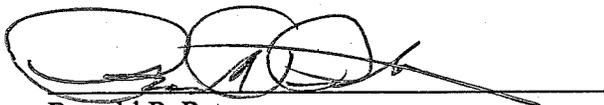
Approximately 4,881 square feet (0.11 acre) of additional jurisdictional wetland has been added in response to the SWCD's comments (i.e. Areas 1, 2 and 6). With one minor adjustment to the boundaries of the pro pit area, no portion of this 0.11-acre would be adversely affected by the proposed motor sports project.

An additional 23,788 square feet (0.55 acre) identified by the SWCD appears to be either non-wetland or artificially created incidental wetland (Areas 3, 4 and 5 combined; nothing resembling jurisdictional wetland was found in Area 7). If so, these areas would not be regulated under the WCA and no additional mitigation would be required. If all of these areas were to be treated as jurisdictional, the mitigation area would need to be enlarged by 23,788 square feet (0.55 acre). Ample space exists in the southwest corner of the site, should this be necessary.

In our professional judgment, the wetland impacts of the proposed motor sports park remain unchanged. Under a worst-case scenario (i.e. Areas 3, 4 and 5 are treated as jurisdictional wetlands), the wetland impacts of the project would be increased by 0.55 acre and the additional replacement would occur on-site. This would represent a minor change to the project's impacts and would not change its potential for significant environmental effects.

Best regards,

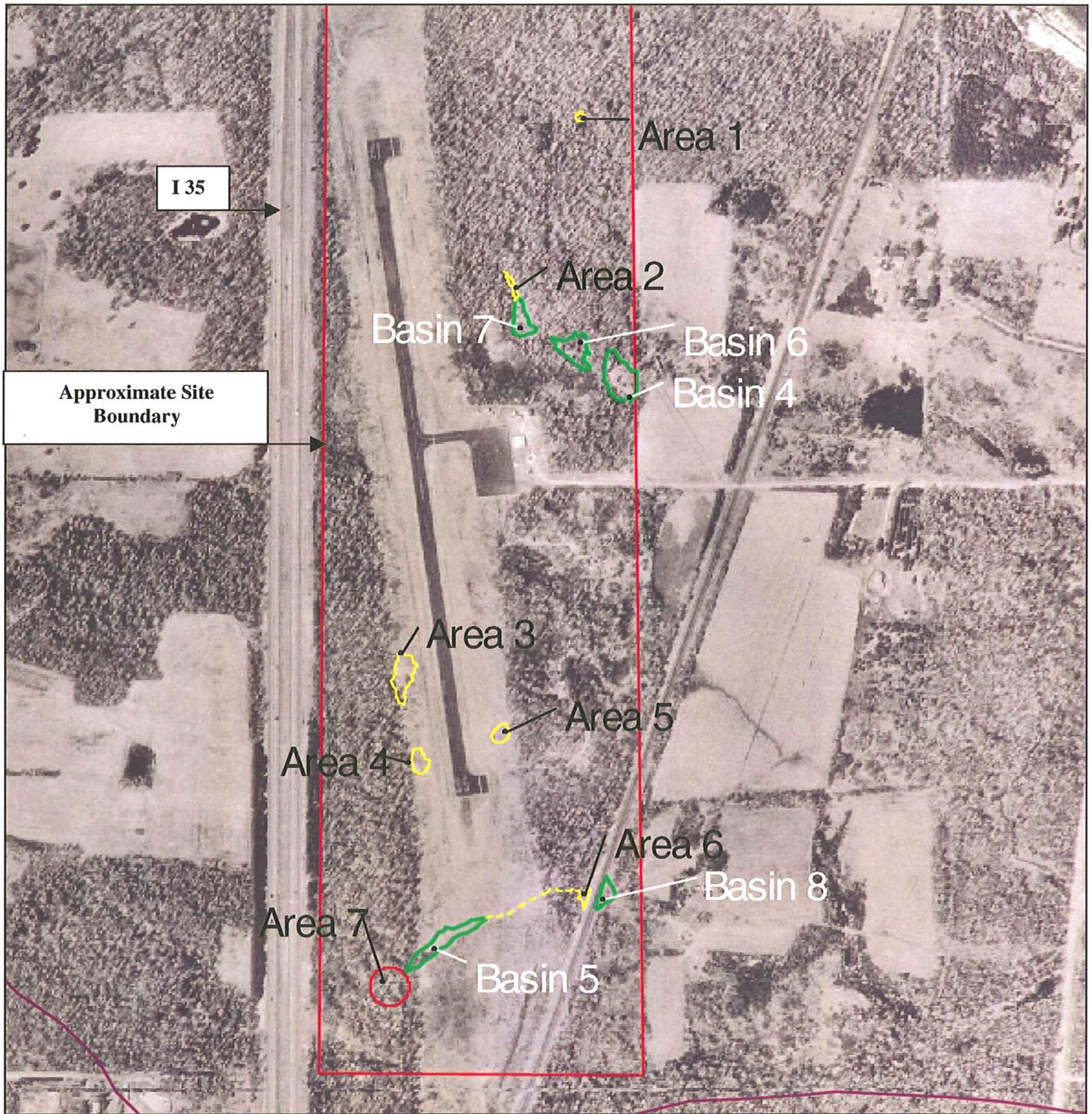
**Peterson Environmental Consulting, Inc.**



Ronald P. Peterson  
President  
Professional Wetland Scientist No. 1118

Enclosures

cc. Dan Henum



## Pine County SWCD Areas of Concern

Proposed Motor Sports Park  
Sandstone, Minnesota



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No Scale



**FIGURE 1**

PEC Project No. 2002-052

Area 1



Area 2



Area 3



Area 4



**Site Photographs: SWCD Areas of Concern**

**Proposed Motor Sports Park  
Sandstone, Minnesota**



**No Scale**

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**FIGURE 2**

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Area 5



Area 6



Intermittent Drainage way West of Area 6



**Site Photographs: SWCD Areas of Concern**

**Proposed Motor Sports Park  
Sandstone, Minnesota**

**No Scale**

**FIGURE 3**

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