

STATE OF MINNESOTA POLLUTION CONTROL AGENCY

**IN THE MATTER OF THE DECISION
ON THE NEED FOR AN ENVIRONMENTAL
IMPACT STATEMENT FOR THE PROPOSED
OTSEGO WEST WASTEWATER TREATMENT FACILITY LIQUIDS PHASE
1 EXPANSION PROJECT
OTSEGO, MINNESOTA**

**FINDINGS OF FACT
CONCLUSIONS OF LAW
AND ORDER**

FINDINGS OF FACT

Pursuant to Minn. ch. 4410, the Minnesota Pollution Control Agency (MPCA) staff prepared and distributed an Environmental Assessment Worksheet (EAW) for the proposed Otsego West Wastewater Treatment Facility Liquids Phase 1 Expansion project. Based on the MPCA staff environmental review, the EAW, comments and information received during the comment period, and other information in the record of the MPCA, the MPCA hereby makes the following Findings of Fact, Conclusions of Law, and Order.

Project Description

1. The City of Otsego (Otsego) owns and operates the West Wastewater Treatment Facility (West WWTF), permitted for an average wet weather flow of 0.72 million gallons per day (mgd) that continuously discharges to an unnamed creek (locally known as Otsego Creek). The West WWTF is approaching its rated capacity. Therefore, within the existing property boundary, the City of Otsego proposes to expand the West WWTF average wet water flow from 0.72 mgd to 1.75 mgd. The treated effluent discharge point will remain unchanged (Project).
2. The Project will result in the following changes to the liquid treatment process:
 - New coarse screening equipment and screenings compaction equipment installed in the existing pretreatment building
 - Reconfigured grit classifier equipment in the exiting pretreatment building
 - New fine screening equipment installed in a new building
 - New secondary biological treatment in new treatment tanks consisting of anaerobic, anoxic, aerobic, and post anoxic zones
 - New membrane bioreactor (MBR) system installed in a new building
 - New blower building
 - New UV disinfection equipment installed in the new MBR building
 - The existing disinfection building will be converted to a storage building; and
 - The existing anaerobic selector tanks and oxidation ditches will be abandoned, but not demolished.
3. The Project will result in the following changes to the solids treatment process:
 - The existing clarifiers will be reserved as future sludge holding tanks
 - The existing aerobic digesters will be utilized as sludge holding tanks and the existing digested sludge storage tank will be reserved for future sludge holding tankage
 - The existing gravity belt thickening building will be upgraded with new pumps but otherwise unmodified; and

- A new administration building will be constructed to serve as a new office, garage, and sludge loading area.
4. Otsego plans to begin construction of the Project during the fall/winter of 2022 and expects construction to take 24-30 months to complete. Otsego's actual construction schedule is dependent upon access to funding, completion of the environmental review process, and approval of permits required for the Project.
 5. Otsego submitted an application to the MPCA on November 15, 2021, for a reissuance to its National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) Wastewater Permit (Wastewater Permit) for the proposed Project. The Wastewater Permit would authorize Otsego to treat and dispose wastewater from the expanded Facility. Otsego must obtain the Wastewater Permit before construction can commence.

Procedural History

6. An EAW is a brief document designed to provide the basic facts necessary for the Responsible Governmental Unit (RGU) to determine whether an Environmental Impact Statement (EIS) is required for a proposed project or to initiate the scoping process for an EIS (Minn. R. 4410.0200, subp. 24). The MPCA is the RGU for this Project.
7. Minn. R. 4410.4300, subp. 18(C) requires preparation of an EAW for this Project because it is an expansion or modification of an existing municipal or domestic wastewater treatment facility that results in an increase by at least 200,000 gallons per day of the Facility's Average Wet Weather Design Flow (AWWDF).
8. The MPCA notified the public for the Project as follows:
 - A. The Environmental Quality Board (EQB) published the Notice of Availability of the EAW for public comment in the EQB Monitor on August 23, 2022, as required by Minn. R. 4410.1500. The public notice period ended on September 22, 2022.
 - B. The EAW was available for review on the MPCA website at: www.pca.state.mn.us/eaw.
 - C. The MPCA provided a news release to media, and other interested parties, on August 23, 2022.
 - D. Otsego's draft permit and application for a Wastewater Permit were put on public notice on August 19, 2022. The public notice period ended on October 18, 2022.
9. During the 30-day EAW comment period ending on September 22, 2022, the MPCA received comments from the State Historic Preservation Office, the Department of Natural Resources (DNR), and the Wright County Soil and Water Conservation District.
10. The list of comments received during the 30-day EAW comment period are included as Appendix A to these Findings.
11. The MPCA prepared written responses to the EAW comments received during the 30-day public comment period, which are also included in Appendix A to these Findings.

Criteria for Determining the Potential for Significant Environmental Effects

12. The MPCA shall base its decision on the need for an EIS on the information gathered during the EAW process and the comments received on the EAW (Minn. R. 4410.1700, subp. 3). The MPCA must order an EIS for projects that have the potential for significant environmental effects (Minn. R. 4410.1700, subp. 1). In deciding whether a project has the potential for significant environmental effects, the MPCA must compare the impacts that may be reasonably expected to occur from the project with the criteria set forth in Minn. R. 4410.1700, subp. 7. These criteria are:
- A. Type, extent, and reversibility of environmental effects.
 - B. Cumulative potential effects. The RGU shall consider the following factors: whether the cumulative potential effect is significant; whether the contribution from the project is significant when viewed in connection with other contributions to the cumulative potential effect; the degree to which the project complies with approved mitigation measures specifically designed to address the cumulative potential effect; and the efforts of the proposer to minimize the contributions from the project.
 - C. The extent to which the environmental effects are subject to mitigation by ongoing public regulatory authority. The RGU may rely only on mitigation measures that are specific and that can be reasonably expected to effectively mitigate the identified environmental impacts of the project.
 - D. The extent to which environmental effects can be anticipated and controlled as a result of other available environmental studies undertaken by public agencies or the project proposer, including other EISs.

The MPCA Findings with Respect to Each of These Criteria Are Set Forth Below

Type, Extent, and Reversibility of Environmental Effects

13. The first criterion that the MPCA must consider when determining if a project has the potential for significant environmental effects is the “type, extent, and reversibility of environmental effects” in Minn. R. 4410.1700, subp. 7(A). The MPCA findings with respect to this criterion are set forth below.
14. The types of impacts that may reasonably be expected to occur from the Project include the following:
- Surface water quality impacts from treated wastewater discharge and stormwater runoff
 - Groundwater quality impacts
 - Air quality impacts, including climate change.
15. Written comments received during the comment period raised no additional issues regarding potential impacts from the Project.
16. With respect to the type, extent and reversibility of impacts that are reasonably expected to occur from the Project, the MPCA makes the following findings.

Surface Water Quality Impacts

17. Otsego has applied for reissuance of its MPCA Wastewater Permit for the proposed West WWTF expansion.
18. The Facility is Class B but will be reclassified to Class A, which means it will be an advanced treatment plant. The Project will expand the Facility's average wet weather flow capacity from 0.72 to 1.75 mgd.
19. The Facility continuously discharges treated effluent into an unnamed creek (locally known as Otsego Creek), which eventually enters the Mississippi River. The Project will not alter the discharge location.
20. Otsego must demonstrate that its discharge has satisfied conditions in Minnesota's antidegradation rules (Minn. R. 7050.0250 through Minn. R. 7050.0335), which ensure the highest possible quality in surface waters of the state. Based upon preliminary review, the MPCA has determined that the treated effluent discharge will satisfy the standards in Minn. R. 7050.0265, as well as federal surface water pollution control statutes and rules administered by the MPCA Commissioner.
21. The MPCA Wastewater Permit will regulate the discharge of pollutants allowed for the Project. The Wastewater Permit establishes effluent limitations to ensure that water quality standards and designated uses of the immediate and downstream receiving waters are protected.
22. Otsego must operate the West WWTF to comply with the Wastewater Permit, federal regulations, state rules, and local requirements.
23. The MPCA does not expect the West WWTF to exceed effluent limits. However, if Otsego has an exceedance or other noncompliance with its Wastewater Permit, Otsego must take corrective actions to improve operations as required by the Wastewater Permit.

Stormwater Runoff

24. Otsego will obtain an MPCA NPDES/SDS General Construction Stormwater Permit (CSW Permit) prior to construction of the Project.
25. The CSW Permit will require Otsego to develop and implement a Stormwater Pollution Prevention Plan (SWPPP) to prevent erosion and control sediment using best management practices (BMPs) to mitigate stormwater impacts. The SWPPP will contain BMPs designed specifically for the Project site and activities to control stormwater, minimize erosion, and prevent impacts to waterbodies.
26. There are no impaired waters within the Project site, but Project construction activities and resulting drainage will take place within 1 mile of Hunters Lake and School Lake, which are recorded as impaired waters in the MPCA's 2022 Impaired Waters List.
27. The CSW Permit will require additional BMPs to protect downstream impaired waters. The Project will include implementation of two stormwater ponds that will serve as permanent stormwater management BMPs that provide stormwater quality and quantity control to mitigate the increased stormwater volume created by the Project's proposed impervious surfaces. The two proposed stormwater ponds are in addition to

the one existing stormwater pond within the Project site that was designed to manage stormwater from the existing Facility.

28. The Facility stores all significant materials indoors and most wastewater operations occur within storm-resistant shelters. The West WWTF is implementing changes so that all wastewater activities occur within storm resistant shelters. This will allow the West WWTF to qualify for the no exposure certification.
29. The MPCA does not reasonably expect significant adverse impacts to water quality. However, if they were to occur, Otsego must modify operations and management of the Project according to its Wastewater Permit. Therefore, the MPCA finds impacts to surface water quality to be reversible.
30. The MPCA finds that information presented in the EAW and other information in the environmental review record are adequate to assess potential impacts to the quality of surface water that are reasonably expected to occur from the Project.
31. The MPCA finds the Project, as proposed, does not have the potential for significant environmental effects based on the type, extent and reversibility of impacts related to surface water, which are reasonably expected to occur.

Groundwater Quality Impacts

32. The West WWTF is contained within the Otsego West Drinking Water Supply Management Area (DWSMA) and the Otsego West Wellhead Protection Area. This Public Water System ID: 1860026 is classified as having a low drinking water supply vulnerability. The Minnesota Department of Health (MDH) classified the Otsego wellhead protection area as having a low vulnerability because of the low likelihood that activities at the land surface may degrade drinking water quality at the public water supply well based on the following factors: geologic sensitivity, well construction, maintenance and use, and water chemistry and isotopic composition.
33. There are no known wells at the Project site according to the MDH Well Index; however, there are multiple wells near the site.
34. There are no known susceptible geologic features based on review of aerial photographs, geological literature and maps including the DNR karst features database.
35. It is possible that dewatering will be required during construction. If dewatering in volumes that exceed 10,000 gallons per day or 1 million gallons per year, then a DNR Water Appropriation Permit will be required, and the contractor needs to obtain that permit prior to construction and to incorporate any pollution control measures necessary to protect groundwater and prevent sediment from being discharged into the unnamed creek (Otsego Creek).
36. Although the MPCA does not expect adverse impacts to groundwater quality, if they were to occur, Otsego must modify the operations and management of the West WWTF according to the Wastewater Permit requirements. Therefore, the MPCA finds groundwater quality impacts that may occur from the Project to be reversible.
37. The MPCA finds that information presented in the EAW and other information in the environmental review record are adequate to assess potential impacts to the quality of groundwater that are reasonably expected to occur from the Project.

38. The MPCA finds that the Project, as it is proposed, does not have the potential for significant environmental effects based on the type, extent, and reversibility of impacts related to groundwater that are reasonably expected to occur from the Project.

Air Quality Impacts

39. The Facility generates air emissions from natural gas heaters and one existing emergency diesel generator. The Project will add one new emergency diesel generator. The wastewater treatment process itself can also be a source of emissions, such as ammonia. The Facility also uses a small amount of solvents for cleaning activities.
40. The facility-wide potential to emit for the West WWTF including the proposed Project is below the major source thresholds and state permit thresholds for all regulated pollutants. Therefore, no state or federal air emission permit is required for the Project.
41. Air dispersion modeling was performed using SCREEN3 as a conservative worst-case scenario, to estimate ambient concentrations from the West WWTF. The MPCA approved the use of SCREEN3 for this project following guidance in place at the time of the initial draft EAW submittal. The criteria air pollutant dispersion modeling analysis included the new and existing carbon odor control units, the new and existing natural gas heaters and make-up air units, and the existing emergency peak shaving generator engine. Background air concentrations were included in the total ambient air impact of the facility. The modeling determined that all modeled facility impacts for PM₁₀, PM_{2.5}, SO₂, NO₂, CO, and H₂S were below the Ambient Air Quality Standards (AAQS).
42. An Air Emissions Risk Analysis (AERA) was also conducted for the Project, which predicted the hazardous air pollutant emissions from the Project. This air toxics assessment was performed for the air emissions emitted from the existing and new carbon odor control units, the existing and new natural gas makeup-air units and heaters, and the existing emergency peak shaving generator engine. The SCREEN3 modeling results were entered in the MPCA's Risk Assessment Spreadsheet (RASS) to calculate the health risks and hazards from the West WWTF air emissions. All facility hazards and risks are less than the health risk guideline value of 1. The results presented in the AERA show that the health risks and hazards for the West WWTF meet the thresholds set by the MDH. Therefore, the West WWTF is not anticipated to cause adverse health effects to the public when considering cumulative effects.
43. With respect to the reversibility of air quality impacts expected to occur from the Project, air emissions from the Project will continue while it remains in operation and would cease only if the Project were temporarily or permanently closed.
44. If excessive air emissions or violations of a standard were to occur, air quality impacts are likely to be correctable. The MPCA could initiate an investigation and require Otsego to make operation and maintenance changes. Therefore, the MPCA finds that any impacts on air quality that may occur from the Project are reversible.
45. The Project will release 1,008 tons (construction) and 701 tons (operation) of carbon dioxide equivalence of greenhouse gas (GHG) emissions. GHGs have the ability to widely disperse within the atmosphere. There are no Minnesota or National Ambient Air Quality Standards for GHGs. At this time, there are no federal or Minnesota thresholds of GHG significance for determining impacts of GHG emissions from an individual project on global climate change.

46. It is not within the current state of science to provide an analysis of the impact that the Project- related GHG emissions will have on the environment.
47. In the absence of a threshold of GHG significance, the MPCA looks to existing regulation. Minn. R. 4410.4300, subp. 15(B), establishes a mandatory category requiring preparation of an EAW for stationary source facilities generating 100,000 tons per year (TPY) of GHGs. The purpose of an EAW is to assess environmental effects associated with a proposed project to aid in the determination of whether an EIS is needed. On the premise of GHG emissions, environmental review regulations establish 100,000 TPY as a “trigger” to prepare an EAW to aid in determining potential significant environmental effects. A reasonable conclusion is that the Project’s GHG emissions at well below 100,000 TPY are not considered significant.
48. The EQB is currently conducting a technical review and stakeholder engagement process (Pilot Program) to evaluate the effectiveness and efficiency of the proposed RGU guidance and revised EAW form. to integrate climate changes impacts into Minnesota Environmental Review. At this time, EQB is evaluating comments received on the Pilot Program and will decided on final recommendations on the revised EAW form by December 2022. Therefore, final recommendations for the revised EAW form and RGU guidance are not available at this time.
49. The MPCA finds that information presented in the EAW and other information in the environmental review record are adequate to assess potential impacts to air quality that are reasonably expected to occur from the Project.
50. The MPCA finds that the Project, as it is proposed, does not have the potential for significant environmental effects based on the type, extent, and reversibility of impacts related to air quality that are reasonably expected to occur from the Project.

Cumulative Potential Effects

51. The second criterion that the MPCA must consider when determining if a project has the potential for significant environmental effects is the “cumulative potential effects.” In making this determination, the MPCA must consider “whether the cumulative potential effect is significant; whether the contribution from the project is significant when viewed in connection with other contributions to the cumulative potential effect; the degree to which the project complies with approved mitigation measures specifically designed to address the cumulative potential effects; and the efforts of the proposer to minimize the contributions from the project.” Minn. R. 4410.1700 subp. 7(B). The MPCA findings with respect to this criterion are set forth below.
52. The EAW, public comments, and MPCA follow-up evaluation did not disclose any related or anticipated future projects that may interact with this Project in such a way as to result in significant cumulative potential environmental effects.
53. The EAW addressed the following areas for cumulative potential effects from the proposed Project:
 - Surface water quality
 - Air quality

Surface Water Quality

54. The Project has been designed to accommodate the City's growing area population and meet all applicable surface water discharge standards to the unnamed creek (Otsego Creek), Mississippi River, and other waterbodies downstream.
55. The Project will not alter the West WWTF discharge location to the unnamed creek (Otsego Creek), which discharges to the Mississippi River.
56. Therefore, the MPCA finds that the Project is not expected to contribute significantly to adverse cumulative potential effects on surface water.

Air Quality

57. The Project's potential air quality impacts have been analyzed through air dispersion modeling and an AERA. The results indicate that the Project will not result in exceedances of applicable state or national ambient air quality standards, or pose significant excess lifetime cancer risks to the public.
58. Therefore, the MPCA finds that the Project is not expected to contribute significantly to adverse cumulative potential effects on air quality.
59. Based on information on the Project obtained from its NPDES/SDS permit application, air modeling report, and AERA presented in the EAW, and consideration of potential effects due to related or anticipated future projects, the MPCA does not expect significant cumulative effects from this Project.
60. The MPCA finds the Project, as proposed, does not have the potential for significant environmental effects related to cumulative potential effects that are reasonably expected to occur.

The Extent to Which the Environmental Effects Are Subject to Mitigation by Ongoing Public Regulatory Authority

61. The third criterion that the MPCA must consider when determining if a project has the potential for significant environmental effects is "the extent to which the environmental effects are subject to mitigation by ongoing public regulatory authority. The RGU may rely only on mitigation measures that are specific and that can be reasonably expected to effectively mitigate the identified environmental impacts of the project." Minn. R. 4410.1700, subp. 7(C). The MPCA findings with respect to this criterion are set forth below.

62. The following permits or approvals will be required for the Project:

Unit of Government	Type of Application
Minnesota Pollution Control Agency (MPCA)	National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) Wastewater Discharge permit reissuance with construction activities
MPCA	NPDES/SDS General Construction Stormwater Permit (CSW permit)
City of Otsego	Conditional Use Permit
Minnesota Department of Natural Resources (DNR)	Water Appropriation Permit

63. MPCA NPDES/SDS Wastewater Discharge Permit

The Project requires a wastewater discharge permit which will include effluent limits to protect water quality in the receiving waters.

64. MPCA CSW Permit

The Project requires a CSW permit which will require the implementation of BMPs to prevent soil erosion and to keep eroded sediment from leaving the construction site. The Project proposer must have a SWPPP that provides details of the specific measures to be implemented. The contractor shall obtain a permit prior to each construction phase.

65. City of Otsego Conditional Use Permit (CUP)

The Project requires a CUP from the City of Otsego to ensure compliance with local ordinances.

66. DNR Water Appropriation Permit

A DNR Water Appropriation Permit is required for users withdrawing more than 10,000 gallons of water per day or 1 million gallons per year. Otsego will evaluate the need for the Water Appropriation Permit as construction plans progress and will contact the DNR if Otsego predicts exceedance of the dewatering threshold.

67. The above-listed permits include general and specific requirements for mitigation of environmental effects of the Project. The MPCA finds that the environmental effects of the Project are subject to mitigation by ongoing public regulatory authority.

The Extent to Which Environmental Effects can be Anticipated and Controlled as a Result of Other Available Environmental Studies Undertaken by Public Agencies or the Project Proposer, Including Other EISs

68. The fourth criterion that the MPCA must consider is “the extent to which environmental effects can be anticipated and controlled as a result of other available environmental studies undertaken by public agencies or the project proposer, including other EISs,” Minn. R. 4410.1700, subp. 7(D). The MPCA findings with respect to this criterion are set forth below.

69. Although not exhaustive, the MPCA reviewed the following documents as part of the environmental impact analysis for the proposed Project:

- Data presented in the EAW
- Wastewater Permit application

- Effluent limits review
 - Antidegradation review
 - Air Dispersion Modeling Report
 - AERA Report
 - Permits and environmental review of similar projects
70. This list is not intended to be exhaustive. The MPCA also relies on information provided by the Project proposer, persons commenting on the EAW, staff experience, and other available information obtained by staff.
71. The environmental effects of the Project have been addressed by the design and permit development processes, and by ensuring conformance with regional and local plans. There are no elements of the Project that pose the potential for significant environmental effects.
72. Based on the environmental review, previous environmental studies by public agencies or the Project proposer, and staff expertise and experience on similar projects, the MPCA finds that the environmental effects of the Project that are reasonably expected to occur can be anticipated and controlled.

CONCLUSIONS OF LAW

73. The MPCA has jurisdiction in determining the need for an EIS for this Project. The EAW, the permit development process, and the evidence in the record are adequate to support a reasoned decision regarding the potential significant environmental effects that are reasonably expected to occur from this Project.
74. The MPCA identified areas for potential for significant environmental effects. The Project design and permits ensure Otsego will take appropriate mitigation measures to address significant effects. The MPCA expects the Project to comply with all environmental rules, regulations, and standards.
75. Based on a comparison of the impacts that are reasonably expected to occur from the Project with the criteria established in Minn. R. 4410.1700 subp. 7, the Project does not have the potential for significant environmental effects.
76. An EIS is not required for the Otsego West Wastewater Treatment Facility Liquids Phase 1 Expansion project.
77. Any findings that might properly be termed conclusions and any conclusions that might properly be termed findings are hereby adopted as such.

ORDER

78. The Minnesota Pollution Control Agency determines that there are no potential significant environmental effects reasonably expected to occur from the Otsego West Wastewater Treatment Facility Liquids Phase 1 Expansion project and that there is no need for an Environmental Impact Statement



Katrina Kessler, Commissioner
Minnesota Pollution Control Agency

October 17, 2022

Date

Minnesota Pollution Control Agency

Otsego West Wastewater Treatment Facility Liquids Phase 1

EAW

LIST OF COMMENT LETTERS RECEIVED

1. Melissa Collins, Minnesota Department of Natural Resources. Letter received September 21, 2022.
2. Sarah J. Beimers, Minnesota State Historic Preservation Office. Letter received September 21, 2022.
3. Alicia O'Hare, Wright County Soil and Water Conservation District. Letter received September 21, 2022.

RESPONSES TO COMMENTS ON THE EAW

1. Comments by Melissa Collins, Minnesota Department of Natural Resources. Letter received September 21, 2022.

Comment 1-1: Thank you for allowing DNR to review and provide early coordination during the development of the Otsego West Wastewater Treatment Facility Liquids Phase 1 EAW draft. Our previous comments have been adequately addressed in the final document and we have no additional comments. Thank you for the opportunity to review this document.

Response 1-1: Comment noted.

2. Comments by Sarah J. Beimers, Minnesota State Historic Preservation Office. Letter received September 21, 2022.

Comment 2-1: Based on our review of the project information, we conclude that there are no properties listed in the National or State Registers of Historic Places, and no known or suspected archaeological properties in the area that will be affected by this project.

Response 2-1: Comment noted.

3. Comments by Alicia O'Hare, Wright County Soil and Water Conservation District. Letter received September 21, 2022.

Comment 3-1: Thank you for the opportunity to comment on the expansion and upgrades to the Otsego West Wastewater Treatment Plant. We want to support the City of Otsego as it provides wastewater treatment services to its residents.

Response 3-1: Comment noted.

Comment 3-2: Wright Soil and Water Conservation District (SWCD) would like to remind the City of Otsego that it is beginning the planning phase of the One Watershed One Plan (1W1P) program for the Mississippi River-Saint Cloud Watershed. The result of this collaboration process between five counties and six SWCDs is a 10-year Comprehensive Watershed Plan for the Mississippi-Saint Cloud HUC 8 watershed.

Response 3-2: Comment noted.

Comment 3-3: First, we encourage your engagement in the process. There will be several opportunities for input, comments, and discussion. Please watch for further correspondence, let us know if you have a specific contact to receive future invitations.

Response: Comment noted.

Comment 3-4: We also thank you in advance for your projected loading and ask that you keep the partnership up to date as you expand your capacity. Accurate knowledge of point-source discharges will help form watershed goals.

Response3-4: Comment noted.

Comment 3-5: Finally, please keep in mind that the program does not end with the completion of the Comprehensive Watershed Plan. During the implementation phase funding becomes available for the watershed partners to utilize based on the plan. Depending on the plan content and priorities the City of Otsego may be able to request these funds for best management practices. Currently, we estimate the funds may become available in 2025.

Response 3-5: Comment noted.

From: [Collins, Melissa \(DNR\)](#)
To: [Sommer, Steve \(MPCA\)](#)
Cc: scott.schaefer@ae2s.com
Subject: Otsego West Wastewater Treatment Facility Liquids Phase 1 EAW - DNR Review
Date: Wednesday, September 21, 2022 4:41:59 PM
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

Dear Steve Sommer,

Thank you for allowing DNR to review and provide early coordination during the development of the Otsego West Wastewater Treatment Facility Liquids Phase 1 EAW draft. Our previous comments have been adequately addressed in the final document and we have no additional comments. Thank you for the opportunity to review this document.

Sincerely,

Melissa Collins

Regional Environmental Assessment Ecologist | Ecological and Water Resources

Pronouns: She/her/hers

Minnesota Department of Natural Resources

1200 Warner Road

St. Paul, MN 55106

Phone: 651-259-5755

Email: melissa.collins@state.mn.us

mndnr.gov



September 21, 2022

Steve Sommer
Planner Principal
Minnesota Pollution Control Agency
520 Lafayette Rd N
St. Paul, MN 55155

RE: EAW – Otsego West Wastewater Treatment Facility Liquids Phase 1
T121 R24 S25, Otsego, Wright County
SHPO Number: 2022-2563

Dear Steve Sommer:

Thank you for providing this office with a copy of the Environmental Assessment Worksheet (EAW) for the above-referenced project.

Based on our review of the project information, we conclude that there are no properties listed in the National or State Registers of Historic Places, and no known or suspected archaeological properties in the area that will be affected by this project.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency. Be advised that comments and recommendations provided by our office for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.

Please contact Kelly Gragg-Johnson, Environmental Review Program Specialist, at 651-201-3285 or kelly.graggjohnson@state.mn.us if you have any questions regarding our review of this project.

Sincerely,



Sarah J. Beimers
Environmental Review Program Manager

Wright SWCD

Please see attached comment letter.



Wright Soil & Water Conservation District

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Minnesota Pollution Control Agency
c/o Steve Sommer
520 Lafayette Road
Saint Paul, MN 55155

RE: Otsego West Wastewater Treatment Facility

Thank you for the opportunity to comment on the expansion and upgrades to the Otsego West Wastewater Treatment Plant. We want to support the City of Otsego as it provides wastewater treatment services to its residents.

Wright Soil and Water Conservation District (SWCD) would like to remind the City of Otsego that it is beginning the planning phase of the One Watershed One Plan (1W1P) program for the Mississippi River-Saint Cloud Watershed. The result of this collaboration process between five counties and six SWCDs is a 10-year Comprehensive Watershed Plan for the Mississippi-Saint Cloud HUC 8 watershed.

First, we encourage your engagement in the process. There will be several opportunities for input, comments, and discussion. Please watch for further correspondence, let us know if you have a specific contact to receive future invitations.

We also thank you in advance for your projected loading and ask that you keep the partnership up to date as you expand your capacity. Accurate knowledge of point-source discharges will help form watershed goals.

Finally, please keep in mind that the program does not end with the completion of the Comprehensive Watershed Plan. During the implementation phase funding becomes available for the watershed partners to utilize based on the plan. Depending on the plan content and priorities the City of Otsego may be able to request these funds for best management practices. Currently, we estimate the funds may become available in 2025.

If you have any questions about the Mississippi River-Saint Cloud 1W1P planning process please contact Alicia O'Hare by email Alicia.ohare@usda.gov or by phone 763-682-1970

Sincerely,

Alicia O'Hare
Water Resource Specialist