

Improving Quality of Water, Quality of Life Established in 1967

November 15th, 2006

United States Department of the Interior National Park Service Mississippi National River & Recreation Area 111 E. Kellog Blvd., Ste. 105 St. Paul, MN 55101-1256

Re: Draft Environmental Impact Statement for the Bureau of Mines Site.

Minnehaha Creek Watershed District Staff has reviewed the environmental impact statement submitted for comment. As a result of this review, MCWD would recommend that the Center be modified by the federal government prior to a transfer with conditions in place to ensure the management of this area as a critical historical and ecological resource.

The EIS analyzed environmental impacts associated with 4 action alternatives:

- A. No action
- B. Transfer of the Center to a university or non federal entity without conditions.
- C. Transfer of the Center to a university or non federal entity with conditions.
- D. Modification of the Center property prior to transfer (either with or without conditions)

Each action alternative was analyzed based on 3 potential land-use scenarios:

- 1. Open space / park
- 2. Interpretive / nature / history center
- 3. Training center / office

MCWD reviewed the potential intensity of impact with respect to:

- 1. Soils
- 2. Vegetation
- 3. Wildlife
- 4. Hydrology
- 5. Water Quality
- 6. Wetlands

Based on the information present in the EIS, MCWD would recommend the implementation of Alternative D (modification prior to transfer) as open space / park to be transferred with conditions. This alternative in conjunction with the land use, offers the least impact to the surrounding ecological systems. As stated in the submitted information, the federal government would manage the mitigation efforts associated removing the existing structures. These efforts would include:

- Removal of contaminated soils, reduce erosion potential.
- Reduction of disturbed areas.
- Natively vegetating disturbed areas, return site to native oak savanna / prairie ecosystem.
- Removal and management of invasive plant species,
- Creation, enhancement and management of wildlife habitat for the variety of organisms which exist in the region.
- Restoring the site to natural hydraulic conditions, reduce current impacts to camp coldwater springs, enhancing groundwater recharge and quality.

The Minnehaha Creek Watershed District is committed to a leadership role in protecting, improving, and managing the surface waters and affiliated groundwater resources within the District, including their relationships to the ecosystems of which they are an integral part, through regulation, capital projects, education, cooperative endeavors, and other programs based on sound science, innovative thinking, an informed and engaged constituency, and the

cost effective use of public

funds.

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- Reduction in sediment loads, treatment of non-point source pollutants from nearby traffic.
- Restoration and creation of wetlands in the area.

In addition, a conditional transfer of the property will ensure continued management of this area as a valued natural and historical resource. While MCWD would recommend converting this property into open space / park, there would also be valuable educational benefits to using the Center as an interpretive / nature / history center. Providing the public with information on the vital role which camp coldwater springs has played throughout history will increase stewardship and awareness of this prized ecological resource.

Thank you for providing Minnehaha Creek Watershed District an opportunity to comment on the Environmental Impact Statement for this valued resource.

James Wisker

District Technician