

Appendix A:

Coordination and Correspondence

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Correspondence is presented in reverse chronological order. Because of changes in the study – due to changing local conditions, information learned during planning, and responses to comments – some older comments may no longer be applicable.

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United States Department of the Interior



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In Reply Refer To:

January 30, 2020

Consultation Code: 03E17000-2017-TA-1020

Consultation Code: 03E19000-2017-TA-0678

Event Code: 03E17000-2020-E-01971

Project Name: Pool 6 Dredged Material Management Plan

Subject: Verification letter for the 'Pool 6 Dredged Material Management Plan' project under the January 5, 2016, Programmatic Biological Opinion on Final 4(d) Rule for the Northern Long-eared Bat and Activities Excepted from Take Prohibitions.

Dear Aaron McFarlane:

The U.S. Fish and Wildlife Service (Service) received on January 30, 2020 your effects determination for the 'Pool 6 Dredged Material Management Plan' (the Action) using the northern long-eared bat (*Myotis septentrionalis*) key within the Information for Planning and Consultation (IPaC) system. This IPaC key assists users in determining whether a Federal action is consistent with the activities analyzed in the Service's January 5, 2016, Programmatic Biological Opinion (PBO). The PBO addresses activities excepted from "take"^[1] prohibitions applicable to the northern long-eared bat under the Endangered Species Act of 1973 (ESA) (87 Stat.884, as amended; 16 U.S.C. 1531 et seq.).

Based upon your IPaC submission, the Action is consistent with activities analyzed in the PBO. The Action may affect the northern long-eared bat; however, any take that may occur as a result of the Action is not prohibited under the ESA Section 4(d) rule adopted for this species at 50 CFR §17.40(o). Unless the Service advises you within 30 days of the date of this letter that your IPaC-assisted determination was incorrect, this letter verifies that the PBO satisfies and concludes your responsibilities for this Action under ESA Section 7(a)(2) with respect to the northern long-eared bat.

Please report to our office any changes to the information about the Action that you submitted in IPaC, the results of any bat surveys conducted in the Action area, and any dead, injured, or sick northern long-eared bats that are found during Action implementation. If the Action is not completed within one year of the date of this letter, you must update and resubmit the information required in the IPaC key.

This IPaC-assisted determination allows you to rely on the PBO for compliance with ESA Section 7(a)(2) only for the northern long-eared bat. It **does not** apply to the following ESA-protected species that also may occur in the Action area:

- Eastern Massasauga (=rattlesnake), *Sistrurus catenatus* (Threatened)
- Higgins Eye (pearlymussel), *Lampsilis higginsii* (Endangered)
- Karner Blue Butterfly, *Lycaeides melissa samuelis* (Endangered)
- Rusty Patched Bumble Bee, *Bombus affinis* (Endangered)
- Sheepnose Mussel, *Plethobasus cyphyus* (Endangered)
- Whooping Crane, *Grus americana* (Experimental Population, Non-Essential)

If the Action may affect other federally listed species besides the northern long-eared bat, a proposed species, and/or designated critical habitat, additional consultation between you and this Service office is required. If the Action may disturb bald or golden eagles, additional coordination with the Service under the Bald and Golden Eagle Protection Act is recommended.

[1]Take means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct [ESA Section 3(19)].

Action Description

You provided to IPaC the following name and description for the subject Action.

1. Name

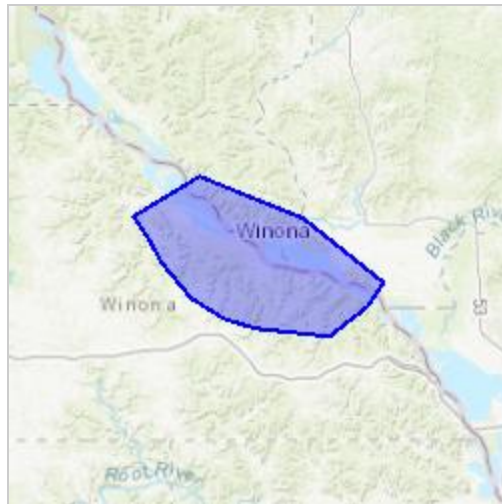
Pool 6 Dredged Material Management Plan

2. Description

The following description was provided for the project 'Pool 6 Dredged Material Management Plan':

The project under evaluation relates to the management of material dredged in order to maintain the navigation channel in Pool 6 of the Upper Mississippi River. The actual areas of impact would be much smaller, discrete parcels located within the Pool 6 area, that would be used for the placement and storage of dredged sand over the next 40 years. Maps detailing the parcels where tree removal would occur can be provided upon request.

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/place/44.03818695255745N91.61141587355701W>



Determination Key Result

This Federal Action may affect the northern long-eared bat in a manner consistent with the description of activities addressed by the Service's PBO dated January 5, 2016. Any taking that may occur incidental to this Action is not prohibited under the final 4(d) rule at 50 CFR §17.40(o). Therefore, the PBO satisfies your responsibilities for this Action under ESA Section 7(a)(2) relative to the northern long-eared bat.

Determination Key Description: Northern Long-eared Bat 4(d) Rule

This key was last updated in IPaC on May 15, 2017. Keys are subject to periodic revision.

This key is intended for actions that may affect the threatened northern long-eared bat.

The purpose of the key for Federal actions is to assist determinations as to whether proposed actions are consistent with those analyzed in the Service's PBO dated January 5, 2016.

Federal actions that may cause prohibited take of northern long-eared bats, affect ESA-listed species other than the northern long-eared bat, or affect any designated critical habitat, require ESA Section 7(a)(2) consultation in addition to the use of this key. Federal actions that may affect species proposed for listing or critical habitat proposed for designation may require a conference under ESA Section 7(a)(4).

Determination Key Result

This project may affect the threatened Northern long-eared bat; therefore, consultation with the Service pursuant to Section 7(a)(2) of the Endangered Species Act of 1973 (87 Stat.884, as amended; 16 U.S.C. 1531 et seq.) is required. However, based on the information you provided, this project may rely on the Service's January 5, 2016, *Programmatic Biological Opinion on Final 4(d) Rule for the Northern Long-Eared Bat and Activities Excepted from Take Prohibitions* to fulfill its Section 7(a)(2) consultation obligation.

Qualification Interview

1. Is the action authorized, funded, or being carried out by a Federal agency?
Yes
2. Have you determined that the proposed action will have “no effect” on the northern long-eared bat? (If you are unsure select "No")
No
3. Will your activity purposefully **Take** northern long-eared bats?
No
4. Is the project action area located wholly outside the White-nose Syndrome Zone?
Automatically answered
No
5. Have you contacted the appropriate agency to determine if your project is near a known hibernaculum or maternity roost tree?

Location information for northern long-eared bat hibernacula is generally kept in state Natural Heritage Inventory databases – the availability of this data varies state-by-state. Many states provide online access to their data, either directly by providing maps or by providing the opportunity to make a data request. In some cases, to protect those resources, access to the information may be limited. A web page with links to state Natural Heritage Inventory databases and other sources of information on the locations of northern long-eared bat roost trees and hibernacula is available at www.fws.gov/midwest/endangered/mammals/nleb/nhisites.html.

Yes

6. Will the action affect a cave or mine where northern long-eared bats are known to hibernate (i.e., hibernaculum) or could it alter the entrance or the environment (physical or other alteration) of a hibernaculum?

No

7. Will the action involve Tree Removal?

Yes

8. Will the action only remove hazardous trees for the protection of human life or property?

No

9. Will the action remove trees within 0.25 miles of a known northern long-eared bat hibernaculum at any time of year?

No

10. Will the action remove a known occupied northern long-eared bat maternity roost tree or any trees within 150 feet of a known occupied maternity roost tree from June 1 through July 31?

No

Project Questionnaire

If the project includes forest conversion, report the appropriate acreages below. Otherwise, type '0' in questions 1-3.

1. Estimated total acres of forest conversion:

11.3

2. If known, estimated acres of forest conversion from April 1 to October 31

0

3. If known, estimated acres of forest conversion from June 1 to July 31

0

If the project includes timber harvest, report the appropriate acreages below. Otherwise, type '0' in questions 4-6.

4. Estimated total acres of timber harvest

0

5. If known, estimated acres of timber harvest from April 1 to October 31

0

6. If known, estimated acres of timber harvest from June 1 to July 31

0

If the project includes prescribed fire, report the appropriate acreages below. Otherwise, type '0' in questions 7-9.

7. Estimated total acres of prescribed fire

0

8. If known, estimated acres of prescribed fire from April 1 to October 31

0

9. If known, estimated acres of prescribed fire from June 1 to July 31

0

If the project includes new wind turbines, report the megawatts of wind capacity below. Otherwise, type '0' in question 10.

10. What is the estimated wind capacity (in megawatts) of the new turbine(s)?
0

March 11, 2019

Re: Feedback meeting on Dredge Management in Winona Feb 21st. Wanted to attend but had several conflicts that evening.

My thoughts:

Short term it is necessary to pile dredge sand. Long term the USDA Farm Service Agency needs to address the huge amount of soil erosion in the Chippewa River watershed, and the upper Mississippi River watershed. They need to correct the lack of soil management. (Don't have the time nor space here but some farm programs encourage planting crops where soil/slope is considered highly erodible. I sympathize with farmers but something has to change.) Fix the problem at the source not at the symptom. The root cause is upstream. Take a drive out in the countryside to see where fields are eroded, road ditches are full of sand, river banks are piled with sand, etc. If you are anywhere along the Mississippi after a heavy rain storm up north you will not only see the river rise but it will turn a dark brown. Driving through a heavy rain storm last summer between Centerville and Arcadia (WI) the hillsides looked like chocolate fondue foundations. On the higher end roughly 100 tons of soil per acre can be eroded in a heavy rain storm. Multiplying that by the thousands of acres in these watersheds equals tremendous volumes of dirt entering the streams and rivers, and clogging our wetlands. I've noticed in the last few years that larger farms now have a dozer in their machinery lineup so they can push in washouts in their fields.

Perhaps the Corps needs to bill upstream soil polluters to truck the sand back up to them, and dump in their fields/construction sites/etc. Perhaps build retention ponds upstream in the water sheds to catch the sand there and not wait for it to get into the Mississippi. It could then be stored and used upstream before ever getting downstream. Anyone who lives in communities with a pond/lake knows it fills in now more rapidly than in prior years. Where it once took fifty years to fill in a pond now takes five years, or so. Perhaps offer incentives to construction firms to haul the sand off for their use. Can't the frack sand industry use any of this? It's coming from the same region as mines. Let's face it – One way or another taxpayers will be on the hook for the cost of keeping the river/shipping channel operational. Use FMEA, Eight Disciplines, or any other analysis tool to determine the most cost effective and least detrimental impact on stakeholders. And, by the way, the barge companies should be paying into this solution as they are the ones who benefit financially.

Thanks for listening.

Randy Rosenberg


Pool 6 DMMP Public Scoping Meeting
Winona Historical Center, Winona, MN
21 February 2019, 18:00-20:00

Bullet Notes from Steve Tapp regarding questions received during Q&A session following presentation:

- Question to clarify how the city levee acts as a constraint.
- Question to clarify if there would be floodplain impacts if material is placed on city side of the levee.
- Suggestion to place material on city side of levee on a 4-5 mile stretch from Prairie Island to Minnesota City.
- Question regarding priority of the Pool 6 plan compared to other DMMP efforts.
- Question regarding Corps ability to help with mitigation to fill wetlands if people offer property to fill since this is a high priority for the Corps.
- Concern for trucks hauling from Homer unless certified crossing is installed over railroad tracks.
- Question regarding feasibility of loading rail cars with sand at the Homer site.
- Suggestion to use material to build islands in Trempealeau Refuge.
- Suggestion to put the sand back in the river.
- Statement regarding recent Supreme Court ruling that would make it more difficult to use eminent domain to acquire property.
- Suggestion to remove material from tributaries like they do at Houston, MN.
- Statement that we need a better idea of where the sediment is coming from.
- Statement that the Corps' sediment budgets are old and that the Corps isn't doing enough to develop better sediment budgets.

Paul Machajewski's Additions:

- Lucy McMartin, City of Winona/Port Authority, mentioned before the meeting that they may have a few more sites to consider. I will follow up with her.
- Question regarding the Federal Standard: Is it different for each pool and does/can it change? The answer I gave was yes.

Other questions regarding Pool 4 DMMP

- Was asked by Chris Rogers (Winona Post) if City of Wabasha's plan to the COE is available. Per Chad Springing (City Administrator, Wabasha, the plan was posted to their website and their Face Book page after it was submitted to us. Loch, suggest you confirm it's there then let Chris know.
- Chuck Akman, Willard Drysdale, and Don Brown (Kohner) all asked me individually the status of the plan. I told them all that we are still awaiting MVD & HQ guidance (they could tell I was as frustrated as they were with how long this is taking).

SUBJECT: Pool 6 Dredged Material Management Plan (DMMP) Agency Meeting Notes 29 October 2018

1. Subject meeting was held at the Winona City Hall, Wenonah Room.

2. Attendees

Minnesota DNR: Bill Huber, Megan Moore (telephone)

Wisconsin DNR: Kurt Rasmussen

USFWS: Mary Stefanski

City of Winona: Keith Nelson

Winona Port Authority: Mike Cichanowski, Myron White

Winona County: Eric Johnson

Corps of Engineers: Aaron McFarlane, Bob Edstrom, Craig Evans, Paul Machajewski

3. Homer Site Discussion

- A. Mike C. stated that historically it has taken a long time to offload dredged sand from the Hemker site, and relying on beneficial use may not work to keep capacity available.
 - Paul M. noted that a factor in that was the material was “owned” by Mr. Hemker, it was not free of charge.
- B. Per Mike C.
 - Homer residents are concerned about uncontrolled access to the Hemker site, with trucks potentially hauling at any time. Hauling in and out of the Hemker site will be a problem.
 - Homer residents are also concerned about potential contaminants, dust, traffic, sight lines, and many other aspects of using the Hemker/Grover sites.
 - It was mentioned that Arsenic was a concern from citizens in dredged material from Pool 6. Kurt noted that arsenic is naturally high in the surrounding area. [Following the meeting Aaron M. checked Corps tests of dredge cuts in Pool 6 from 2016 and 2014, which indicated Arsenic levels below Minnesota state guidance levels for in-water and upland placement.]
 - The concerns noted above were captured in meeting notes dated 29 May 2018 from a meeting between Steve Tapp, Zach Kimmel (Corps of Engineers) and a few residents of the community of Homer, MN.

4. Other Site Options & General Comments

- A. Keith N. and Mike C. support investigating expanding the Winona Harbor site.
 - The site should be left with perimeter trees to screen the site
 - Need to look at floodway impacts.
- B. Keith N. will look into the Prairie Island Campground area to see if it could be raised using dredged material.
- C. Historically, the Corps of Engineers and the City of Winona had a real estate agreement for placing dredged material on City property upstream of the maritime museum. The City now has an agreement with a local contractor for moving products to/from the river via the City Dock.
 - There was a boom in the FRAC industry in the Winona area back in 2014 - 2015. It has slowed down considerably; the Port of Winona has only loaded a few FRAC barges this year.

- The primary commodities moved via the Winona Commercial Harbor is salt, fertilizer and distillers grain.
- Winona is the third-largest port in Minnesota by tonnage.
- D. Beach development and enhancement was suggested as a way of managing dredged material; specifically the lack of beaches in Pool 6.
- E. Flood stage impacts need to be considered for all in-water placement (i.e. island building) and floodplain placement (i.e. beach development and enhancement).
- F. Perrot/Johnson Island and Island 73 could be future Sec 204 projects championed by the WDNR.
- G. Future islands in the Trempealeau Refuge should be considered.
- H. Sites to be considered for use: Expansion of the Winona Harbor (Dick's Marine) and the Port Authority site next to the maritime museum.
 - Bill H. reminded us that any wetlands on these two sites are likely above the OHWM of the river, and are therefore under jurisdiction of the Wetland Conservation Act, administered by City of Winona.
- I. Meeting attendees seemed to support developing multiple sites around Winona to lessen burden on the Homer site. Multiple locations may encourage more beneficial use removal by providing material closer to different users.
- J. The Corps will continue discussions with the Grover family for possible utilization of their property.
- K. Mike C. suggested burying a box culvert in the drainage ditch from Lake Winona to the pump station on the east side of town.
- L. Site needs identified by the Corps include river access, capacity, accessibility for public beneficial use removal and to a limited degree, marketability of sites for increased/sustained usage.

5. Due Outs

- A. Paul to investigate and provide historic Winona Commercial Harbor dredge cuts to Bill H. [Following the meeting Paul M. worked with Bill H., Keith N. and Myron W. to track down the historic dredge cuts in the Commercial Harbor.]
- B. Corps of Engineers to follow up with Winona City Planner.
- C. Corps of Engineers to follow up with officials from Goodview.
- D. Corps of Engineers to talk to USFWS reps (Tim Yager / Sabrina Chandler / Tim Miller) regarding potential projects in Trempealeau NWR that would use dredged material.
- E. Corps of Engineers to follow up with MDOT.
- F. Corps of Engineers to follow up with CP Rail.

6. Call or email me if you have any questions or comments.

Paul Machajewski
 Dredged Material Manager
 St. Paul District, US Army Corps of Engineers

Pool 6 DMMP AGENCY MTG

10-29-2018

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phone

From: [Kimmel, Zachary R CIV USARMY CEMVP \(US\)](#)
To: [Wayne Wicka](#)
Subject: Memorandum for Record: Homer Resident Meeting 29May2018
Date: Thursday, June 07, 2018 3:38:00 PM

Wayne,

See notes below (again, view in HTML if possible). I believe I've captured your additional comments with the exception of agreeing to develop a plan to grow and improve adjacent properties. We've acknowledged your concern with regard to the sand pile potentially diminishing property values below, which I believe you were referring to; however, expending funds to increase adjacent properties is not something we are authorized to do. Please feel free to share this bulleted list with other landowners. The Pool 6 Dredged Material Management Plan Project Delivery Team will be setting up a public scoping meeting in the near future (date and time undetermined at this point). I will keep you apprised and I plan to attend if available to bridge the gap between our discussions and where the team is. Thanks for your input.

A meeting was held on 29 May 2018 at Homer Town Hall between the Corps of Engineers and various landowners adjacent the Homer placement site to discuss the use/implementation of the placement site. The following people were in attendance: Corps of Engineers - Steve Tapp and Zach Kimmel, landowners - Wayne Wicka, Mike Chickanowski, John Staats, Ted Haaland, Mike Puetz, Lance Hislop, and Mike Vogel.

The following is a bulleted list portraying the various points discussed at the meeting.

- The Corps indicated that the site has been used to place material 10 times in the past 16 years. Beneficial use has been slow at times, but we believe that will increase once improvements are made to the access and the material is available for free. The Corps has reached out to the County and other contractors in the area to gauge interest in use of the material and we believe there is enough interest to move all of the material.
- Several stressed the importance of the Corps being a "good neighbor."
- Wayne made a comment that the site does not help property values.
- Landowners requested that the Corps establish an agreement with the local municipality to address some of their concerns, consisting of: maintaining a reduced stockpile height, having a contingency plan for the removal of material from the Homer site, limiting weekend traffic in and out of the placement site, limiting noise caused by large equipment or trucks/trains.
 - A reduced stockpile height of 10' was requested by the landowners.
- Mike C. mentioned that train traffic has increased substantially over the past several years.
- Landowners stressed the importance of safety as it's very dangerous for trucks to pull in and out of Homer, the Corps then expressed that they're looking to establish an acceleration/deceleration lane and railroad crossing to alleviate some of the safety concerns.
- Landowners expressed that the location of the placement site is in the middle of a residential neighborhood which isn't good for the community.
- Landowners expressed noise concerns regarding the establishment of a railroad crossing, in addition, Mike C. expressed that he doesn't want to lose the RR crossing and thus access to his property.
- It was also brought up that if the crossing is converted from private to public, it no longer falls

under the authority of the municipal "quiet zone."

- Mike C. questioned the existing boundary survey between his property and the Hemker property being acquired by the Corps, expressing that it may be inaccurate.
- Wayne expressed great concern regarding the stockpile height and potential health hazards it causes for his family and local residents (air quality, specific concern of Silicosis).
- Landowners mentioned the need for the Corps to have a plan, the Corps then expressed that the Pool 6 Dredged Material Management Plan (DMMP) is underway and that a draft report is expected to be provided to the public in the August timeframe.
- The community expressed their desire to have the sand removed from the Homer site ASAP.
- Several expressed concern that the Draft DMMP would be released at a time that was too late to add comments. They were assured that all comments received during the public comment period would be addressed.
- The Corps also expressed that public meetings (likely to be held in Winona) will be a component of the public release of the Pool 6 Draft DMMP and encouraged attendance from everyone at the meeting.
- The Corps agreed to forward concerns from this meeting along to the Project Delivery Team that is currently working on the DMMP.
- A suggestion was made to pursue use of dredged material as FRAC sand. We confirmed that our recent testing showed that about 40 percent of the material in Pool 4 that we tested met criteria for use as FRAC sand, but it was mixed with material that did not meet criteria. We are doing more testing and will continue to pursue this effort, but it doesn't appear to be economical at this time.
- The Corps expressed to the community that real estate practices have changed substantially and the Corps is no longer able to reach out to landowners and establish dredged material placement easements in a prompt manner. The Corps added that this makes it difficult to take advantage of beneficial use opportunities, which could help alleviate some of the aforementioned concerns (pile height) and make the situation better for all.
- Despite real estate challenges, the Corps agreed to explore use of the Winona Technology Park placement site owned by the Winona Port Authority.

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Commenting Agency	Page	Comment Number	Comment
USFWS	21	FWS-1	Regarding the Pool 6 Annual Dredging Figure: I understand this but would feel better about the comparison if it was comparing the same number of years against each other, ie. 1981-1995 is 15 years, 1996-2005 is 10 years, and 2006-2014 is 9 years. It appears that you are trying to skew numbers by not comparing the same number of years (like 10 years for each comparison).
USFWS	22	FWS-2	Report Text: "The following period from 2011-2014 was also unique because 2011 and 2014 saw large flood events that increased the dredging volume. However, the increased deposition was not observed in adjacent pools during these flood events." Question: Didn't ALL of the upper Pools have an increase in deposition in 2014, not just Pool 6?
USFWS	36	FWS-3	"130,000 cubic yards seems like a lot more than what could really be placed on the Garvin Brook Pit site."
USFWS	44	FWS-4	In section 5.5.1, paragraph 3, the first criteria for environmental acceptability is wetland impacts. The Homer-Grover site is "mostly wetland" and yet it remains in the category of sites being carried forward. Regardless of the finding in 1996, the COE has the opportunity to do the right thing environmentally and NOT fill a wetland for the benefit of getting sand out of the main channel. I strongly urge that this site be removed from consideration. FWS is not supportive of the use of this site.
USFWS	48	FWS-5	FWS is supportive of Alternative 1. FWS is supportive of Alternative 2 IF the Grover Property is removed. FWS is supportive of Alternative 3 FWS is supportive of Alternative 4

US COE Pool 6 DMMP draft review – Initial Comments

Thank you for providing for an initial review of the Draft DMMP for Pool 6. Here are some questions and suggestions for refining the draft plan:

Contamination between backwater and main channel should be separated and explained.

p. 9 Might want to separate discussion for the main channel sediments from the backwater areas. As virtually all dredging would occur in the channel. Of if some dredging would occur in backwater areas, provide an estimate of the percent coming from that source. Why are Ontario Ministry of Environment and Energy's Sediment Quality Guidelines being used as reference?

Description of Homer Site(s) could be clarified

Distinguish the difference between the historic Homer site with the two other "proposed" Homer sites. It is confusing to have the historic Homer site put up for sale and some fill remaining to be distributed; but the chosen alternative includes one of the new Homer sites (the Hemker site, which appears to be the same as the historic Homer site). This needs to be clarified in the Executive Summary and in description of sites.

Directly distinguish the historic Homer site with the Hemker portion.

This is confusing: Noted that the historic homer site is for sale (2013). "That same year, it was indicated to the Corps by the owner of the Homer site that availability for placement was limited because much of the material from recent placement events was still on the site. The owner has also listed the property for sale, making future use of the site uncertain." What is the update on this finding? A table in the document shows that information updated in 2015. But then this site is included in the preferred alternative? The link should be included in the Hemker portion. Also indicate why road improvements would be needed considering the site has received 225,000 cyds.

Pg 24 – here it is shown the both the historic and Hemker portion are the same. "there are no longer facilities available in the study area with capacity to place the amount of material dredged annually in Pool 6. Two of the three sites (Winona Commercial Harbor and the Hemker portion of the Homer site)."

Pg 25 In order to meet this criteria, the Corps will likely need to obtain a long-term real-estate interest (e.g. easement, ownership in-fee, etc.) in any property that will be planned for use. This appears to be applicable to the Homer - Hemker Site. Why not include qualification in those sites in which this statement is applicable.

Plate 2 only shows one Homer Placement Site. Plate 3 shows the difference of the two Homer placement sites. The inset on Plate 3 should be provided early on so one can understand the difference in the two sites. Also the Homer – Hemker site is shown as the same as the historic Homer site.

4.1 Forecasting Future Conditions

Projected beneficial use assumptions are questionable. Has there been any discussion with State, County, City planners about development plans and need for sand in the future?

There are other factors impacting the dredging needs for the next 40 years. The DMMP should also address loss of floodplain/backwater capacity to store sediment, increasing frequency of large flood events (vs average annual discharge), and the unknown quantities of in-channel sediment sources and increasing potential for even more erosion from in-channel and shoreline sources. In channel sources of sediment could be addressed in the bullet in Section 4.2.1 Island and Shoreland Erosion. Alternative 1 may not provide the capacity needed for the uncertainties stated above.

The DMMP should address other hydrologic trends in addition to the average annual discharge, such as; frequency of large flood events, seasonal timing of events (shift of peak events to May and June), and the duration of high water events.

Finally, we feel there is a need for updated models on tributary sediment loads taking into account these hydraulic trends.

Future Potential Placement at Mosquito Island

The plan could consider the Mosquito Island approved 58,000 cy as presented but also evaluate its future potential as a current option, as this was discussed in the site description. The plan could include the future potential as a site, which is presently not carried forward.

Contingencies.

If opportunities arose in which beneficial use opportunities change, such as a private interest in obtaining significant fill for a commercial project, not identified at this time. Consider the project as being less costly and having minimal environmental effects. What would be the contingencies for the new found opportunities if occurring during the 40-year period.

Provide contingency in case materials were found to be contaminated, or the risk of future contamination.

Annual vs project life dredge material capacities

Need to note the capacity in terms of annual vs life of project. Please address capacities in charts and tables that indicate annual placement and provide graphics that show the cumulative potential placement for each site included in the preferred alternative.

Appendix B site

Appendix B It is hard to tell which parcel is being evaluated as no titles are given for the property or on the Figures.

General alternatives provided

Alternative one is most desirable from standpoint of environmental impacts of project. Our initial review would support the selection of Alternative One.

Site Evaluation, Floodplain Concerns

Many of the alternative placement sites are located in the floodway portion of the floodplain. Although these sites were not carried forward, it may be good to note the potential for flood impacts of these sites. This would include; 5.3.2 Deone's Property, 5.3.3 Forest River Campground, some of the sites in 5.3.4 Island Construction including Mosquito Island (I understand these impacts have been addressed with WIDNR) and 5.44 Winona Harbor Expansion, 5.4.5 Highway 43 Bridge Site.

Site Evaluation, Wetlands

For the Port Authority Site, 5.4.6, the plan states that approximately one acre of the site was wetland. It goes on to say that the area is a relatively undisturbed, high-quality native floodplain forest. Are not floodplain forests wetlands? The site maps and the wetland map do not have the same boundaries. Overlaying the parcels on the wetland map may help clarify wetland impacts for each site.

References need checking.

Need to check to insure references are cited in the reference list.

General comments from WI DNR on the initial review of the Pool 6 Draft DMMP, February 2016:

Mosquito Island plan—will this be built from multiple dredging events occurring in short timeframe? The average dredge cuts are 15-22K, and so only represent a portion of the available capacity (57-58,000cy in your reports), but stabilization and topsoil should occur as soon as possible after placement of the sand base, particularly vanes on the main channel side of the island. Providing construction sequencing information will be important.

Stockpiled material at 5A is referenced as a “free” source of rock material for the vanes, but that material has also been scheduled for use in conjunction with the backwater dredge cuts that were conducted in fall 2015 by Randy Urich’s crew. It will be important to assure that sufficient rock is available for Mosquito Island and that any additional costs for acquisition and transport are built into the budget so that the project can be constructed as planned.

Of the options provided, Alternative 1 provides an appropriate means of securing placement capacity for material generated within Pool 6. However, we are concerned that the acquisition and improvements to the site may not materialize, leaving us in the same situation as present. Without additional discussion of the likelihood of acquisition and sufficient budget to make the road improvements, it is difficult to envision whether this alternative will come to fruition as expected. While it seems that the road improvements would not necessarily have to be completed concurrent with property acquisition (or perhaps at all, as raised by MN DNR), those costs will ultimately impact the offer price for purchase of the property. What is the contingency plan if property owner is not willing to sell or provide a long-term lease?

Of the provided options, Alternative 3 is our next preferred. The location of the Miller Waste Management site adjacent to the boat landing makes an attractive option for easy offload and beneficial use in Winona. The opportunity to acquire that property now so that it could be available for future use should not be overlooked. After observing the use of conveyor systems at the Grand Encampment offload, it would seem that such a system may be able to be established between the boat ramp and Miller site to remove the need for trucking altogether.

We do feel there are combinations of options that would include beneficial use for island protection or construction that should be taken farther in the planning process. These include Johnson/Perrot Islands and habitat island construction in the backwaters near RM 719. While there would be minimal environmental value to be gained from expanding beyond the historic footprint of Mosquito Island, there are benefits to be accrued associated with habitat protection and enhancement in the backwaters near RM 719. The proximity of this backwater to the Homer & Blacksmith Slough dredge cuts offers an opportunity to extend the lifespan of the Homer placement site and/or as a contingency to the remaining issues to be addressed there (acquisition, road improvements, pile height, etc). It was unclear why Mosquito Island could be constructed utilizing a combination of Corps’ Maintenance & Repair staff and contracted mechanical dredging crews while habitat islands in the backwaters nearby could not be. We would like to see more information about why the backwater sites could not be

conducted in a similar fashion and at similar costs as Mosquito Island and what economic and capacity benefits may be gained from including those sites for available use within the lifespan of the plan.

We concur that the ADM and Port Authority sites should be considered the lowest priority options in order to avoid impacts to high quality wetlands and to end the practice of losing habitat in Winona only to have the placement site turned over to development. These remaining wetland sites should be protected and buffered.

We were interested to read the information pertaining to the Winona Harbor and Highway 43 Bridge Staging sites and the consideration of expansion between these sites. While we agree with Minnesota DNR that wetland impacts should be avoided, we wondered whether nearby offsite mitigation had been considered to replace the wetlands lost to the staging area. Protection and restoration of other floodplain forest sites in and around Winona might ultimately provide better quality wetlands than those that have already been impacted by the staging activities and that will be restored immediately adjacent to the bridge. The staging site would provide good access for beneficial use and may have the potential to grow in popularity similar to the Lansing Bridge placement site in Pool 9.

Potential placement at Perrot/Johnson Island should be included within the Pool 6 DMMP. From WI DNR perspective, even though the site may only utilize material from the less frequent dredge cuts, that capacity should be incorporated into the DMMP in order to both prolong the life of the primary placement sites and to ensure that planning can be conducted in the intervening years to allow the project to be shovel ready when the lower dredge cuts require dredging. Since the DMMP lifespan is meant to be 40 years, there should be several dredge events in the lower cuts that could potentially be placed at Perrot/Johnson Island if the site is approved and plans are laid out in advance. The DMMP seems to be the appropriate place to account for the capacity generated by these projects and to establish criteria as to when they might be utilized.

We concur with MN DNR's comments pertaining to estimated annual vs. project life dredge material capacities and also with the projected beneficial use assumptions.