STATE OF MINNESOTA
BEFORE THE
PELICAN RIVER WATERSHED DISTRICT
Sitting as the Responsible Government Unit for
the Campbell Creek Stream Stabilization and Flood Storage Project
Environmental Assessment Worksheet

In the Matter of: **Campbell Creek Stream Stabilization and Flood Storage Project**	**FINDINGS OF FACT AND RECORD OF DECISION ON THE DETERMINATION OF NEED FOR AN ENVIRONMENTAL IMPACT STATEMENT**

At a public meeting on May 21, 2025, conducted by the Pelican River Watershed District, sitting as the responsible government unit for the Environmental Assessment Worksheet for the Campbell Creek Stream Stabilization and Flood Storage Project, Manager Michaelson moved, seconded by Manager Okeson for adoption of the following FINDINGS OF FACT AND RECORD OF DECISION ON THE DETERMINATION OF NEED FOR AN ENVIRONMENTAL IMPACT STATEMENT:

I. BACKGROUND

Pursuant to Minn. R. 4410.4300, an environmental assessment worksheet ("EAW") was prepared by the Pelican River Watershed District (the "District") as the responsible government unit ("RGU") for the Campbell Creek Stream Stabilization and Flood Storage Project (the "Project"). The EAW for the Project was prepared and reviewed in accordance with Minn. R. 4410. The EAW was prepared to assess the potential impacts of the Project, specifically, criteria referenced under Minn. R. 4410.1700, to determine if an environmental impact statement ("EIS") is needed.

The EAW was filed with the Minnesota Environmental Quality Board ("EQB") and circulated for review and comments to the required EAW distribution list. A NOTICE OF AVAILABILITY for the EAW was published in the *EQB Monitor* on April 1, 2025. The NOTICE OF AVAILABILITY and a press release were published in the *Detroit Lakes Tribune* on April 5, 2025, and the District's website. These notices provided a brief description of the Project and information where copies of the EAW were available and invited the public to provide comments that would be used in determining the need for an EIS for the Project. The EAW was made available for public review at the District's office and on its website.

All comments received during the EAW review period, which ended on May 1, 2025, were considered in determining the potential for significant environmental impacts and discussed further herein.

II. FINDINGS OF FACT

1. The District proposes to conduct rehabilitation activities within portions of Campbell Creek in Becker County, MN. The Project goals include stabilization of eroded streambanks,

reduced sediment delivery to Floyd Lake, improved flood storage, and improved fish passage. Proposed activities include bank grading, conifer revetments, grade control structures, riprap toes, rock arch rapids, and culvert replacement.

2. The purpose of the Project is to address Campbell Creek impairments, reduce loading of suspended solids and phosphorous to downstream waters, improve aquatic habitat, and reduce the flow rate and volume of flood events. Campbell Creek is listed by the Minnesota Pollution Control Agency ("MPCA") as Impaired for Aquatic Life due to excess total suspended solids ("TSS"). The District is also concerned about excessive sediment and nutrient delivery to Floyd Lake, the receiving water for Campbell Creek. Campbell Creek and Floyd Lake are also included as priority waterbodies for sediment and nutrient reductions in the Otter Tail River One Watershed One Plan (the "Comprehensive Plan").

3. The Project plan was incorporated into the District's Comprehensive Plan, and as a result, the District is able to establish the Project pursuant to Minn. Stat. § 103D.605 – Project Constructed with Government Aid or as Part of Plan.[1] In the Comprehensive Plan, Campbell Creek has a short-term phosphorus reduction goal of 45 pounds per year (5% reduction) and a short-term sediment reduction goal of 126 tons per year (4% reduction). Campbell Creek is one of four stream reach segments targeted for sediment reduction in the Comprehensive Plan.

4. The Project features two work areas, known as the Upper Reach and Lower Reach. The Lower Reach work includes implementation of channel stabilization along approximately 3,800 feet of Campbell Creek to address areas of active bank erosion, reduce potential for future erosion by reconnecting the floodplain, and provide aquatic organism passage through the County Road 149 culvert. The Upper Reach work focuses on improving flood storage capacity. Permanent work will occur within the existing channel, and the existing stream alignment will not be altered. Construction is expected to occur between October 2025 and April 2026. The main design elements include rock arch rapids, bank grading, conifer revetments, grade control structures, riprap toe, and culvert replacement.

    a. Rock Arch Rapids (Upper Reach): Two sets of rock arch rapids with riprap weirs will be constructed near the outlet from Campbell Lake, likely using excavators and skid steers. Each structure consists of a series of five, 3-4' boulder weirs. Material excavated near the bottom of the riffle will be placed along the traversable and recoverable slope on the upgradient side of the rapids sequence. The riffles will have a maximum three percent slope down-gradient. The rock arch rapids will promote flood storage by acting as outlet control structures for Campbell Lake and will maintain a more constant flow in this intermittent channel. Water levels on Campbell Lake will not be altered or raised as a result of the rock arch rapids. Gaps will be maintained in the weirs to allow for fish passage and additional water storage upstream.

[1] The Project was initiated prior to Minn. Stat. § 103D.605 being repealed by the Minnesota Legislature. The District adopted a motion to utilize the process under Minn. Stat. § 103D.605 to establish the Project prior to it being repealed.

b. Bank Grading (Lower Reach): A standard excavator will be used from on top of the bank to create three to one slopes along approximately 1,460 linear feet of stream bank. Regraded areas will be seeded with native seed mixes and a woven coir soil erosion control blanket (bio-netting or natural-netting) will be installed parallel to the flow up to the top of the bank.

c. Conifer Revetments (Lower Reach): In select areas, coniferous trees will be placed overlapping in the channel and parallel to flow with 4-5"-diameter untreated stakes installed into the bank and bed. There will be approximately 950 linear feet of revetments within the Project limits. Conifer revetments help stabilize the streambank and provide habitat for various aquatic species. These features will be installed primarily on eroded outside bends.

d. Grade Control Structures (Lower Reach): A total of eighteen grade control structures will be installed. At each location, an arch-shaped trench will be dug across the channel using a standard excavator stationed outside the channel. Class IV riprap will be laid into the trench to a height of 1-2' above the streambed. These structures will help restore the incised channel to historic elevations and reconnect the channel to the floodplain.

e. Vegetated Riprap Toe (Lower Reach): At select streambank areas with significant erosion concerns, Class IV riprap will be installed from the bank toe upslope to the 25-year storm flood elevation. Each riprap toe structure will be restored with topsoil, native seed mix, erosion control blankets, and coir blankets.

f. New Culvert (Lower Reach): The Project will replace the existing 60-inch reinforced concrete pipe culvert with a 10-foot wide by 8-foot tall box culvert buried by a foot and filled with 12 inches of gravel to allow fish passage. This option requires open cut excavation and road replacement.

5. Pursuant to Minn. R. 4410.0500, subp. 1, the District is the RGU for the Project's EAW. Under Minn. R. 4410.4300, subp. 26, "for a diversion, realignment, or channelization of any designated trout stream, or affecting greater than 500 feet of natural watercourse with a total drainage area of ten or more square miles," an EAW is mandatory and the District is the RGU.

6. The EAW is incorporated by reference into this FINDINGS OF FACT AND RECORD OF DECISION ON THE DETERMINATION OF NEED FOR AN ENVIRONMENTAL IMPACT STATEMENT.

7. The EAW was filed with the EQB and a NOTICE OF AVAILABILITY was published in the *EQB Monitor* on April 1, 2025. A copy of the EAW was sent to all persons on the EQB distribution list, to those persons known by the District to be interested in the Project, and to those persons requesting a copy of the EAW. On April 5, 2025, a press release announcing the availability of the EAW was sent to the *Detroit Lakes Tribune*, the newspaper of general circulation in Becker County, Minnesota, and posted on the District's website.

8. The thirty (30) day EAW public review and comment period commenced on April 1, 2025, and expired on May 1, 2025, in compliance with Minn. R. 4410.1600.

9. During the thirty (30) day public review and comment period, the District received three (3) comment letters, attached hereto as **Exhibit A**. The comments, and responses thereto, were incorporated into a matrix which is attached hereto as **Exhibit B**. The comment letters and responses are hereby incorporated into this FINDINGS OF FACT AND RECORD OF DECISION ON THE DETERMINATION OF NEED FOR AN ENVIRONMENTAL IMPACT STATEMENT.

10. The District further considered the criteria established under Minn. R. 4410.1700, subp. 7 in deciding whether the Project has the potential for significant environmental effects.

III. DECISION REGARDING THE POTENTIAL FOR SIGNIFICANT ENVIRONMENTAL EFFECTS

1. In deciding whether a project has the potential for significant environmental effects and whether an EIS is needed, the RGU must compare the impacts that may be reasonably expected to occur from the Project with the four (4) factors by which potential impacts must be evaluated under Minn. R. 4410.1700, subp. 7, including: (A) type, extent, and reversibility of environmental effects; (B) cumulative potential effects; (C) the extent to which the environmental effects are subject to mitigation by ongoing public regulatory authority; and (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.

A. Type, Extent, and Reversibility of Environmental Effects.

Based upon information provided in the EAW and the comments provided by West Central Initiative, Minnesota Pollution Control Agency, and the Minnesota Department of Natural Resources, and the responses to the comments by the District, the District concludes that the potential environmental effects of the Project will be limited and can be addressed through the permitting process.

B. Cumulative Potential Effects.

Cumulative effects were not identified during the comment period. The cumulative impacts identified in the EAW were evaluated and determined that if the identified mitigative steps are implemented and all permitting processes are followed, there are no anticipated cumulative environmental impacts as a result of the Project.

C. The Extent to Which the Environmental Effects are Subject to Mitigation by Ongoing Public Regulatory Authority.

The mitigation of environmental impacts will be designed and implemented in coordination with the applicable regulatory agencies. All mitigation efforts will be subject to the plan approval and permitting process. Permits and approvals that have been obtained, or those that may be required prior to construction, are identified as follows:

Unit of Government	Type of Application	Status
Federal		
U.S. Army Corps of Engineers	Section 404 Wetland and Waterbody Permit	To be completed
U.S. Environmental Protection Agency	319 Nonpoint Source Management Grant Funding	Grant funds awarded
Minnesota State Historic Preservation Office	Section 106 Cultural Resources Consultation	Report to be submitted in Spring 2025
State		
Minnesota Pollution Control Agency (MPCA)	NPDES Construction Stormwater Permit	To be completed
MPCA	401 Water Quality Certification	To be completed, if needed
Minnesota Department of Natural Resources (MNDNR)	Public Waters Work Permit	To be completed
MNDNR	Natural Heritage Review	Completed
MNDNR	Construction Dewatering Water Appropriation Permit	To be completed, if needed
Local		
Pelican River Watershed District	EAW Review and EIS Need Decision	Under review
Pelican River Watershed District	Shore Impact Zone Alteration permit	To be completed
Pelican River Watershed District	Culvert Replacement permit	To be completed
Becker Soil and Water Conservation District	Wetland Conservation Act Wetland Delineation Review	To be completed
Becker Soil and Water Conservation District	Wetland Conservation Act No-loss Approval	To be completed
Becker County	Public Water Alteration approval	To be completed, if needed
Becker County	Culvert Replacement approval	To be completed

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.

Use of other EAWs, EISs, or other public agency documents is not needed to anticipate/control environmental effects. Environmental effects from the Project will be controlled using Minnesota specific agriculture best management practices (when appropriate) during construction.

2. Based on the foregoing Findings of Fact, the consideration of environmental effects, and the entire record of proceedings before the Board of Managers, the Board of Managers, acting as the RGU for the Campbell Creek Stream Stabilization and Flood Storage Project EAW, hereby decides as follows:

IV. RECORD OF DECISION

1. The District fulfilled all procedural requirements of law and rule applicable to determining the need for an EIS on the Project, including procedures outlined under Minn. R. 4410.1000 through 4410.1700.

2. Based on the EAW, comments received from state and federal agencies, the responses to comments, and the criteria above, the District finds that the Project does not have the potential for significant environmental effects and does not require the preparation of an EIS.

3. All requirements for environmental review of the Project have been met.

4. The EAW and the development processes related to the Project have generated information which is adequate to determine whether the Project has the potential for significant environmental effects.

5. In areas where potential environmental effects have been identified, the District has included proper mitigative responses to be included within the final design of the Project. Mitigation will be required to be provided where impacts are expected to result from Project construction, operation, or maintenance. Mitigative measures will be required to be incorporated into the Project design and have been or will be coordinated with state and federal agencies during the applicable permit process.

6. Based on the criteria in Minn. R. 4410.1700, the Project does not have the potential for significant environmental effects.

7. The District makes a "Negative Declaration;" an Environmental Impact Statement is not required for the proposed Campbell Creek Stream Stabilization and Flood Storage Project.

8. The District shall provide this FINDINGS OF FACT AND RECORD OF DECISION ON THE DETERMINATION OF NEED FOR AN ENVIRONMENTAL IMPACT STATEMENT, within five (5) days, to all persons on the EAW distribution list, to all persons that commented in writing during the thirty (30) day review period, and to any person upon written request.

9. Persons who submitted timely and substantive comments on the EAW shall be sent a copy of the District's response to those comments.

10. The District will proceed to establish the Project pursuant to Minn. Stat. § 103D.605.

[Remainder of page left blank intentionally.]

After discussion, the President of the Board of Managers of the Pelican River Watershed District called the question. The question was on the adoption of the foregoing FINDINGS OF FACT AND RECORD OF DECISION ON THE DETERMINATION OF NEED FOR AN ENVIRONMENTAL IMPACT STATEMENT, and there were 7 yeas, 0 nays, 0 absent, and 0 abstentions as follows:

	Yea	Nay	Absent	Abstain
Michaelson	☒	☐	☐	☐
Chris Jasken	☒	☐	☐	☐
Charlie Jasken	☒	☐	☐	☐
Okeson	☒	☐	☐	☐
Olson	☒	☐	☐	☐
Kral	☒	☐	☐	☐
Busker	☒	☐	☐	☐

Upon vote, the President declared the motion passed and the FINDINGS OF FACT AND RECORD OF DECISION ON THE DETERMINATION OF NEED FOR AN ENVIRONMENTAL IMPACT STATEMENT adopted.

PELICAN RIVER WATERSHED DISTRICT

Date: 5/21/25, 2025

Rick Michaelson, President

Attest:

Date: 5-21-25, 2025

Tera Guetter, Administrator

* * * * * * * * * * * *

I, Tera Guetter, Pelican River Watershed District Administrator, do hereby certify that I have compared the above motion, findings, and decision with the original thereof as the same appears of record and on file with the Pelican River Watershed District and find the same to be a true and correct transcript thereof. The above decision was filed with me, Pelican River Watershed District Administrator, on this 21 day of May, 2025.

Date: 5-21-, 2025

Tera Guetter, Administrator

EXHIBIT A
COMMENT LETTERS

From: Mark Kaelke <mark@wcif.org>
Sent: Wednesday, April 2, 2025 11:40 AM
To: prwdinfo@arvig.net
Subject: Campbell Creek Project

Hello Terra:

I'm pleased to see the Otter Tail 1W1P is helping to enable what looks to be a good project on Campbell Creek! I am wondering though, why post-project AG BMPs on grazing practices and buffers don't appear to be noted in the EAW?

It's certainly possible I just missed them but if not, it does seem that providing information on adjacent landowners voluntarily implementation of BMPs would help to assure the public the investment in the project is worthwhile and project goals will be realized. I'm wondering if you could please steer me to that information in the document or we might discuss that a bit further when you have a moment.

Thank you,

Mark

West Central Initiative

Mark Kaelke

West Central Initiative

Community Planner

218-998-1633 (x-133)

wcif.org

MINNESOTA POLLUTION CONTROL AGENCY

Marshall Office | 504 Fairgrounds Road | Suite 200 | Marshall, MN 56258-1688 | 507-537-7146

800-657-3864 | Use your preferred relay service | info.pca@state.mn.us | Equal Opportunity Employer

April 14, 2025

VIA EMAIL

Tera Guetter, District Administrator
Pelican River Watershed District
211 Holmes Street West
Detroit Lakes, Minnesota 56501
tera.guetter@arvig.net

RE: Campbell Creek Stabilization and Flood Storage Project – Environmental Assessment Worksheet

Dear: Tera Guetter

Thank you for the opportunity to review and comment on the Environmental Assessment Worksheet (EAW) for the Campbell Creek Stabilization and Flood Storage project (Project) located in Becker County, Minnesota. The Project consists of the Pelican River Watershed District (PRWD) conducting rehabilitation activities within portions of Campbell Creek in Becker County, Minnesota. The Project goals include stabilization of eroded streambanks, reduced sediment delivery to Floyd Lake, improved flood storage and improved fish passage. Proposed activities include bank grading, conifer revetments, grade control structures, riprap toes, rock arch rapids and culvert replacement. Regarding matters for which the Minnesota Pollution Control Agency (MPCA) has regulatory responsibility and other interests, the MPCA staff has the following comments for your consideration.

Watershed
The MPCA Northwest Watershed unit staff agree with the statements in the EAW that the proposed Project will reduce sediment and nutrient loading, improve aquatic habitat, reduce flow rates and the impacts of flood events. Furthermore, MPCA Northwest Watershed unit staff agree that the proposed Project will contribute to the strategies, recommendations, goals established and provided in the Otter Tail River TMDL and WRAPS reports, the Otter Tail River One Watershed One Plan and the Headwaters Pelican River Watershed Nine Key Elements Plan.

401 Certification
This Project will likely require a 401 Certification.

We appreciate the opportunity to review this Project. Please be aware that this letter does not constitute approval by the MPCA of any or all elements of the Project for the purpose of pending or future permit actions by the MPCA.

Ultimately, it is the responsibility of the Project Proposer to secure any required permits and to comply with any requisite permit conditions. If you have any questions concerning our review of this EAW, please contact me by email at chris.green@state.mn.us or by telephone at 507-476-4258.

Sincerely,

Chris Green

This document has been electronically signed.

Chris Green, Project Manager
Environmental Review Unit
Resource Management and Assistance Division

CG:rs

Attachment

cc: Dan Card, MPCA
Scott Schroeder, MPCA
Molly Costin, MPCA
Nicole Peterson, MPCA
Lauren Dickerson, MPCA
Deepa deAlwis, MPCA
Innocent Eyoh, MPCA
Michael Rafferty, MPCA

DEPARTMENT OF NATURAL RESOURCES

Ecological and Water Resources
2115 Birchmont Beach Rd NE
Bemidji, MN 56601

April 23, 2025

Tera Guetter, District Administrator
Pelican River Watershed District
211 Holmes Street West
Detroit Lakes, MN, 56501
tera.guetter@arvig.net

Re: Campbell Creek Stabilization and Flood Storage Project EAW

Dear Tera Guetter,

Thank you for the opportunity to review the Campbell Creek Stabilization and Flood Storage Project Environmental Assessment Worksheet (EAW). The Minnesota Department of Natural Resources (MN DNR) agrees that the project should improve conditions on this altered stream system by stabilizing eroded streambanks, reducing sediment to downstream waters, increasing flood storage, and improving fish passage.

MN DNR staff have identified that a Bald Eagle nest may occur within or adjacent to the proposed Lower Reach project area. A survey of the project area should be conducted to identify any eagle nests. If nests are found, further consultation with the U.S. Fish and Wildlife Service may be needed as detailed in the EAW Appendix E.

Thank you for considering these comments. Please continue to coordinate with MN DNR staff as project plans are finalized and contact Area Hydrologist Rodger Hemphill (Rodger.Hemphill@state.mn.us) regarding Public Water permitting. Please contact me (owen.baird@state.mn.us) with any concerns or questions.

Sincerely,

Owen Baird
Environmental Assessment Ecologist – Northwest Region | Ecological and Water Resources

CC: Christine Herwig, MN DNR Ecological and Water Resources

Equal Opportunity Employer

EXHIBIT B

COMMENTS AND RESPONSES MATRIX

Comment Letter	Commenter	Comment	PRWD Response
#1	**Mark Kaelke, Community Planner, West Central Initiative**	I'm pleased to see the Otter Tail 1W1P is helping to enable what looks to be a good project on Campbell Creek! I am wondering though, why post-project AG BMPs on grazing practices and buffers don't appear to be noted in the EAW? It's certainly possible I just missed them but if not, it does seem that providing information on adjacent landowners voluntarily implementation of BMPs would help to assure the public the investment in the project is worthwhile and project goals will be realized.	*While no land management BMPs were proposed as part of the Project described in the EAW, we acknowledge that improved soil and water conservation on properties within the subwatershed could help the Project's goals and help protect the public investment through reduced sediment delivery and stormwater runoff. PRWD will continue to pursue erosion control and water management projects on upstream lands as opportunities develop. We appreciate the generosity extended already by the landowners associated with the proposed Project, which is entirely on privately owned land.*
#2	**Chris Green, Environmental Review Project Manager, Minnesota Pollution Control Agency (MPCA)**	The MPCA Northwest Watershed unit staff agree with the statements in the EAW that the proposed Project will reduce sediment and nutrient loading, improve aquatic habitat, reduce flow rates and the impacts of flood events. Furthermore, MPCA Northwest Watershed unit staff agree that the proposed Project will contribute to the strategies, recommendations, goals established and provided in the Otter Tail River TMDL and WRAPS reports, the Otter Tail River One Watershed One Plan and the Headwaters Pelican River Watershed Nine Key Elements Plan.	*Thank you for the comment and for the MPCA's support of the Project.*
		The project will likely require a 401 certification.	*Clean Water Act (CWA) Section 401 certification, if needed, would be obtained during the CWA Section 404 permitting process, as administered by the U.S. Army Corps of Engineers (USACE). PRWD has engaged with USACE on wetland and waterbody impact permitting and will be applying for a Nationwide Permit (NWP 27 "Aquatic habitat restoration, enhancement, and established activities").*
#3	**Owen Baird, Environmental Assessment Ecologist, Minnesota Department of Natural Resources (MDNR)**	Thank you for the opportunity to review the Campbell Creek Stabilization and Flood Storage Project Environmental Assessment Worksheet (EAW). The Minnesota Department of Natural Resources (MN DNR) agrees that the project should improve conditions on this altered stream system by stabilizing eroded streambanks, reducing sediment to downstream waters, increasing flood storage, and improving fish passage.	*Thank you for the comment and for MDNR's support of the Project.*
		MN DNR staff have identified that a Bald Eagle nest may occur within or adjacent to the proposed Lower Reach project area. A survey of the project area should be conducted to identify any eagle nests. If nests are found, further consultation with the U.S. Fish and Wildlife Service may be needed as detailed in the EAW Appendix E.	*PRWD will conduct an eagle nest survey within the Project area (plus a 660-foot buffer) for the presence of eagle nests. Identified nest locations will be recorded, and then each nest would be subject to observation. Findings will be reported to MDNR and U.S. Fish and Wildlife Service (USFWS). PRWD will consult with USFWS as needed for permitting and compliance with the U.S. Bald and Golden Eagle Protection Act.*