



November 3, 2021

Thomas Paschke
City of Roseville Planner
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Dear Thomas,

This letter is to provide comment from the Ramsey-Washington Metro Watershed District (RWMWD) on the Victoria Shores Environmental Assessment Worksheet (EAW) as published on October 5, 2021.

As is noted in the EAW, RWMWD will require a permit for the construction of this project. The applicant has applied for a RWMWD grading permit. The status of that permit is on hold pending this EAW process. The RWMWD grading permit regulates stormwater and floodplain management, erosion and sediment control, and wetland requirements. The RWMWD permit review process will ensure that the wetlands are not being impacted per the Minnesota Wetland Conservation Act and stormwater quantity and quality are addressed. Information on RWMWD's permit program and the rules that are required to be met for this project can be found at <https://rwmwd.org/permits/>.

The EAW fails to mention wetland buffer preservation as required by the RWMWD permit. We require a no-disturb upland buffer adjacent to the wetland boundary. The wetland within this project boundary is classified as a Manage A, which requires a 37.5' minimum and 75' average no-disturb buffer. The RWMWD, in conjunction with the city of Roseville, will require a joint buffer agreement that regulates access through the buffer to the lake with the goals of natural vegetation preservation, erosion prevention, and the prohibition of imported fill materials. This agreement will be signed by the property developer and will apply to future homeowners along the lake and wetland. The agreement will serve as an enforcement mechanism should any prohibited impacts to the buffer be observed post-construction. Wetland buffer signage is also required at each lake lot to indicate the boundary of that buffer.

In addition to the requirements under our regulatory program, RWMWD also has goals and policies related to this project and the impact on our natural resources. As a watershed, our goals include the preservation and protection of our wetlands and lakes. Our regulatory

program tries to mitigate changes on the landscape, however the city's zoning and shoreland ordinances regarding this development also plays a critical role. While the EAW does address direct and indirect impacts to the wetland and lake system, we would continue to encourage the city to work with the developer to minimize those impacts from the number of lake accesses and dock placements that are currently proposed.

We also would like to emphasize the importance of following all recommended DNR mitigation measures for the Blanding's turtle and least darter. The developer should also implement rigorous erosion and sediment control practices during construction and post-construction to maintain water clarity for common loon protection.

Practices that go above and beyond the minimum requirements could address the sensitive conditions on this development. The developer may work with us to look at opportunities to go above and beyond in their project design and implementation. Grants may be available to improve native vegetation on the site and the shoreline of the lake. Stewardship grant awards can be given to applicants if the practices go above and beyond the requirements under regulatory programs of the watershed and other permitting authorities.

Thank you for the opportunity to comment on this EAW and please let me know if there are any questions regarding our comments.

Sincerely,

Tina Carstens

Tina Carstens
Administrator

cc: Nicole Soderholm, RWMWD Permit Coordinator
Ramsey-Washington Metro Watershed District Board of Managers