

Erskine, MN

DEED / HUD Small Cities Development Program
Environmental Review Record

City of Erskine Water Tower Rehabilitation



January 2026 | 24329



U.S. Department of Housing and Urban
Development
451 Seventh Street, SW
Washington, DC 20410
www.hud.gov/espanol.hud.gov

Environmental Review for Activity/Project that is Categorically Excluded Subject to Section 58.5 Pursuant to 24 CFR 58.35(a)

Project Information

Project Name: City of Erskine Water Tower Rehabilitation

Responsible Entity: City of Erskine

Grant Recipient (if different than Responsible Entity):

State/Local Identifier: CDAP-24-0070-O-FY25

Preparer: Kelsey Kline, Environmental Scientist I

Certifying Officer Name and Title: Marc Plante, Mayor

Grant Recipient (if different than Responsible Entity):

Consultant (if applicable): Moore Engineering, Inc.

Direct Comments to: Kelsey Kline
Moore Engineering, Inc.
(320) 281-5493
Kelsey.kline@mooreengineeringinc.com

Project Location:

The City of Erskine is located in Polk County, Minnesota, along U.S. Highway 2 and State Highway 59, approximately 30 miles east of the City of Crookston. Erskine is a small community known for its scenic setting near several lakes and its strong sense of local identity. The city serves as a hub for surrounding rural areas, providing essential public services, small businesses, and recreational opportunities. Its location along U.S. Highway 2 offers convenient access to larger regional centers while preserving the charm and livability of a small Minnesota town.

Description of the Proposed Project [24 CFR 50.21 & 58.32]:

This project will rehabilitate the City of Erskine's existing water tower to improve safety, compliance, and operational efficiency. The water tower currently lacks several features required by OSHA regulations, AWWA standards, and Minnesota Department of Health requirements. In addition, some components are outdated or prone to corrosion, which can lead to increased maintenance costs and reduced reliability. The rehabilitation will include removing obsolete equipment, installing new safety devices, and upgrading access and ventilation features to meet confined space entry standards. The project will also add a new submersible mixer to improve water quality by reducing ice formation in winter and preventing stratification in summer. Additional improvements include replacing gaskets, modifying

overflow discharge, upgrading the tank vent and aviation lighting, and installing new manways for better ventilation during maintenance. These upgrades will extend the service life of the water tower, enhance worker safety, and ensure compliance with all applicable health and safety regulations, ultimately providing the City with a safe and reliable water storage facility.

Level of Environmental Review Determination:

Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5: Acquisition, repair, improvement, reconstruction, or rehabilitation of public facilities and improvements (other than buildings) when the facilities and improvements are in place and will be retained in the same use without change in size or capacity of more than 20 percent (e.g., replacement of water or sewer lines, reconstruction of curbs and sidewalks, repaving of streets).

Funding Information

| Grant Number | HUD Program | Funding Amount |
|---------------------|-----------------------------------|----------------|
| CDAP-24-0070-O-FY25 | Community Development Block Grant | \$600,000 |

Estimated Total HUD Funded Amount: \$600,000

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$791,750

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

| Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6 | Are formal compliance steps or mitigation required? | Compliance determinations |
|---|---|---|
| STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.6 | | |
| Airport Hazards 24 CFR Part 51 Subpart D | Yes No <input type="checkbox"/> <input checked="" type="checkbox"/> | According to the MNDOT Airport Influence Map, the City of Erskine is not situated within an Airport Influence Area. The nearest airport is Fosston Municipal Airport located approximately 10 miles southeast of the City. The closest military airport is located at Grand Forks AFB, approximately 67 miles northwest of Erskine. The project |

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| | | area is not within a Runway Potential Zone/Clear Zone (RPZ/CZ) or an Accident Potential Zone (APZ). |
| Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501] | Yes No <input type="checkbox"/> <input checked="" type="checkbox"/> | The project is not located in a Coastal Barrier Resource Service (CBRS) area and has no impact on the CBRS area. The nearest CBRS area is MN-01 located near Duluth and about 194 miles southeast of Erskine. |
| Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a] | Yes No <input type="checkbox"/> <input checked="" type="checkbox"/> | This project does not involve mortgage insurance, refinance, acquisition, repairs, rehabilitation, or construction of a structure, mobile home, or insurable personal property. This project does not require flood insurance or is excepted from flood insurance. Polk County is listed on the FEMA Communities Participating in the National Flood Program. |
| STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5 | | |
| Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93 | Yes No <input type="checkbox"/> <input checked="" type="checkbox"/> | The project is not located within a non-attainment area. Air quality currently in the area is considered "Good" with a PM2.5=44. Construction from the project has potential to create minor dust issues. The contract specification will require minimal dust and air impacts. |
| Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d) | Yes No <input type="checkbox"/> <input checked="" type="checkbox"/> | The project is not located within a Coastal Zone Management (CZM) area. The only CZM area in Minnesota is located along the coast of Lake Superior in northern Minnesota approximately 189 miles southeast of Erskine. |
| Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2) | Yes No <input type="checkbox"/> <input checked="" type="checkbox"/> | A review of the Minnesota Pollution Control Agency's (MPCA) What's in My Neighborhood database and the U.S. Environmental Protection Agency's NEPAssist tool confirmed that there are no hazardous waste sites or toxic release facilities located on the water tower site. Because all work will be confined to the existing water tower footprint and previously disturbed areas, the project will not |

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| | | <p>encounter or create any impacts related to hazardous waste or toxic substances.</p> <p>In the event that contaminated soil, groundwater, or hazardous materials are encountered during construction, work will cease in the affected area, and appropriate measures will be implemented in accordance with MPCA and EPA regulations. The contractor will be responsible for the proper handling, characterization, and disposal of any hazardous materials in compliance with all applicable federal and state requirements.</p> |
| <p>Endangered Species</p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p> | <p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p> | <p>The IPaC identified four species that have the potential to be in the project area; gray wolf (threatened), the monarch butterfly (proposed threatened), Suckley’s cuckoo bumble bee (proposed endangered), and the western prairie fringed orchid (threatened). The IPaC also listed the potential for several migratory birds to be present: the bald eagle, bobolink, chimney swift, franklin’s gull, le conte’s sparrow, northern harrier, and the western grebe. Construction is anticipated to occur in previously disturbed areas. The project will have no effect on the federally listed species due to the nature of the construction. There are no designated critical habitat areas, refuge lands, or fish hatcheries within the vicinity of the project.</p> |
| <p>Explosive and Flammable Hazards</p> <p>24 CFR Part 51 Subpart C</p> | <p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p> | <p>It is unlikely the project will be working near hazardous operations handling conventional fuels or chemicals of an explosive or flammable nature. The EPA NEPAassist website identified areas near the project area that contain generators. All work will occur within existing public rights-of-way and previously disturbed areas, reducing the potential for encountering unknown fuel storage systems or flammable materials. Standard construction safety practices and applicable state and federal regulations will be followed to minimize any risk related to fuel handling during construction activities. The project is not expected to pose or</p> |

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| | | encounter any explosive or flammable hazards. |
| <p>Farmlands Protection</p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p> | <p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p> | <p>The Farmland Protection Policy Act (FPPA) does not apply due to the proposed project being within the City limits of Erskine. Project construction will occur in the existing road right-of-way and will not convert any agricultural land to non-agricultural use.</p> |
| <p>Floodplain Management</p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p> | <p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p> | <p>According to the FEMA National Flood Hazard Layer, the project area is located in an unmapped zone, meaning FEMA has not assigned a specific flood hazard designation for this location. Additionally, no local sources identified the project area to be in a floodplain. Based on available information, the project is not anticipated to impact any floodplains.</p> |
| <p>Historic Preservation</p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p> | <p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p> | <p>A review of the EPA NEPAassist database and the National Register of Historic Places (NRHP) confirmed that there are no historic properties within the City of Erskine or in the vicinity of the proposed project area. Therefore, the project will have no effect on historic or cultural resources. The State Historic Preservation Office (SHPO) provided a comment letter on December 12, 2025, concurring with a finding of No Historic Properties Affected for the proposed project.</p> <p>A tribal consultation letter was sent to the identified tribes on December 3, 2025 using contacts obtained through the Tribal Directory Assessment Tool (TDAT). Two tribal responses were received during consultation from the Turtle Mountain Band of Chippewa Indians and the Leech Lake Band of Ojibwe. Neither tribe expressed any concerns regarding the proposed project, and both indicated that the project would not affect historic properties. In the event that any human remains or cultural artifacts are encountered during construction, all work will cease immediately, and the appropriate authorities will be contacted.</p> |

| | | |
|---|--|---|
| <p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p> | <p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p> | <p>The project will generate normal construction noise and will be temporary during construction. It is not anticipated that the project will drastically increase the noise to the area. However, if the level of noise that is created by the project exceeds the thresholds allowed by law or becomes a health hazard, steps will be taken to mitigate the noise levels.</p> |
| <p>Sole Source Aquifers</p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p> | <p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p> | <p>There are no Sole Source Aquifers (SSA) located within the project area. The only SSA in Minnesota is located approximately 137 miles southeast of the project, near Mille Lacs Lake.</p> |
| <p>Wetlands Protection</p> <p>Executive Order 11990, particularly sections 2 and 5</p> | <p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p> | <p>According to the U.S. Fish and Wildlife Services National Wetlands Inventory, there are no wetlands within or adjacent to the proposed project area. All work will be constructed within the water tower footprint and will occur entirely on previously disturbed land. As a result, the project is not anticipated to affect any wetlands or aquatic resources.</p> |
| <p>Wild and Scenic Rivers</p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p> | <p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p> | <p>According to the MNDNR, the U.S. National Park Service, and the Nationwide Rivers Inventory the project area is not near any state or federally protected Wild and Scenic Rivers, study rivers, or Nationwide Rivers.</p> |

Field Inspection (Date and completed by):

No field inspection has been completed for the project area at this time. A field visit will be conducted prior to construction to verify existing site conditions and identify any features not apparent from mapping or other available data. If the inspection findings warrant additional documentation, an addendum will be prepared and included in the environmental review.

Summary of Findings and Conclusions:

This Environmental Review that is Categorically Excluded found no impact on airports, air quality, coastal barrier resources, coastal zones, contamination and toxic substances, endangered species, farmlands, floodplains, sole source aquifers, wetlands, and wild and scenic rivers. No historic or cultural resources will be affected, as confirmed by SHPO and tribal consultation. Because all work will occur within the existing water tower footprint and previously disturbed areas, the project is expected to proceed without the need for formal mitigation measures, aside from standard construction best practices.

Mitigation Measures and Conditions

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

| Law, Authority, or Factor | Mitigation Measure |
|-------------------------------|--|
| Erosion and Stormwater Runoff | Best Management Practices (BMP's) will be used for erosion prevention and sediment control. |
| Noise | Construction is anticipated to occur during daylight hours, mainly Monday through Friday, or in accordance with City ordinances. Occasionally there may be construction outside of these hours or on a weekend if the company is required to work around customer schedules or has been impacted due to other factors. Equipment will be properly maintained, including use of mufflers to reduce noise impacts. |

Determination:

- This categorically excluded activity/project converts to Exempt, per 58.34(a)(12) because there are no circumstances which require compliance with any of the federal laws and authorities cited at §58.5. ~~Funds may be committed and drawn down after certification of this part for this (now) EXEMPT project; OR~~
- This categorically excluded activity/project cannot convert to Exempt because there are circumstances which require compliance with one or more federal laws and authorities cited at §58.5. Complete consultation/mitigation protocol requirements, **publish NOI/RROF and obtain "Authority to Use Grant Funds"** (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds; OR
- This project is now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).

Preparer Signature: *Kelsey Kline* Date: 1/23/2026

Name/Title/Organization: Kelsey Kline/ Environmental Scientist I/ Moore Engineering Inc

Responsible Entity Agency Official Signature:

Marc Plante Date: 2/9/26

Name/Title: *Mayor - Marc Plante*

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-1000

This Worksheet was designed to be used by those “Partners” (including Public Housing Authorities, consultants, contractors, and nonprofits) who assist Responsible Entities and HUD in preparing environmental reviews, but legally cannot take full responsibilities for these reviews themselves. Responsible Entities and HUD should use the RE/HUD version of the Worksheet.

Airport Hazards (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/airport-hazards>

1. To ensure compatible land use development, you must determine your site’s proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?

No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within the applicable distances to a military or civilian airport.*

Yes → *Continue to Question 2.*

2. Is your project located within a Runway Potential Zone/Clear Zone (RPZ/CZ) or Accident Potential Zone (APZ)?

Yes, project is in an APZ → *Continue to Question 3.*

Yes, project is an RPZ/CZ → *Project cannot proceed at this location.*

No, project is not within an APZ or RPZ/CZ

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Continue to the Worksheet Summary below. Provide a map showing that the site is not within either zone.*

3. Is the project in conformance with DOD guidelines for APZ?

Yes, project is consistent with DOD guidelines without further action.

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documentation supporting this determination.*

No, the project cannot be brought into conformance with DOD guidelines and has not been approved. → *Project cannot proceed at this location.*

If mitigation measures have been or will be taken, explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

Click here to enter text.

→ *Work with the RE/HUD to develop mitigation measures. Continue to the Worksheet Summary below. Provide any documentation supporting this determination.*

Worksheet Summary

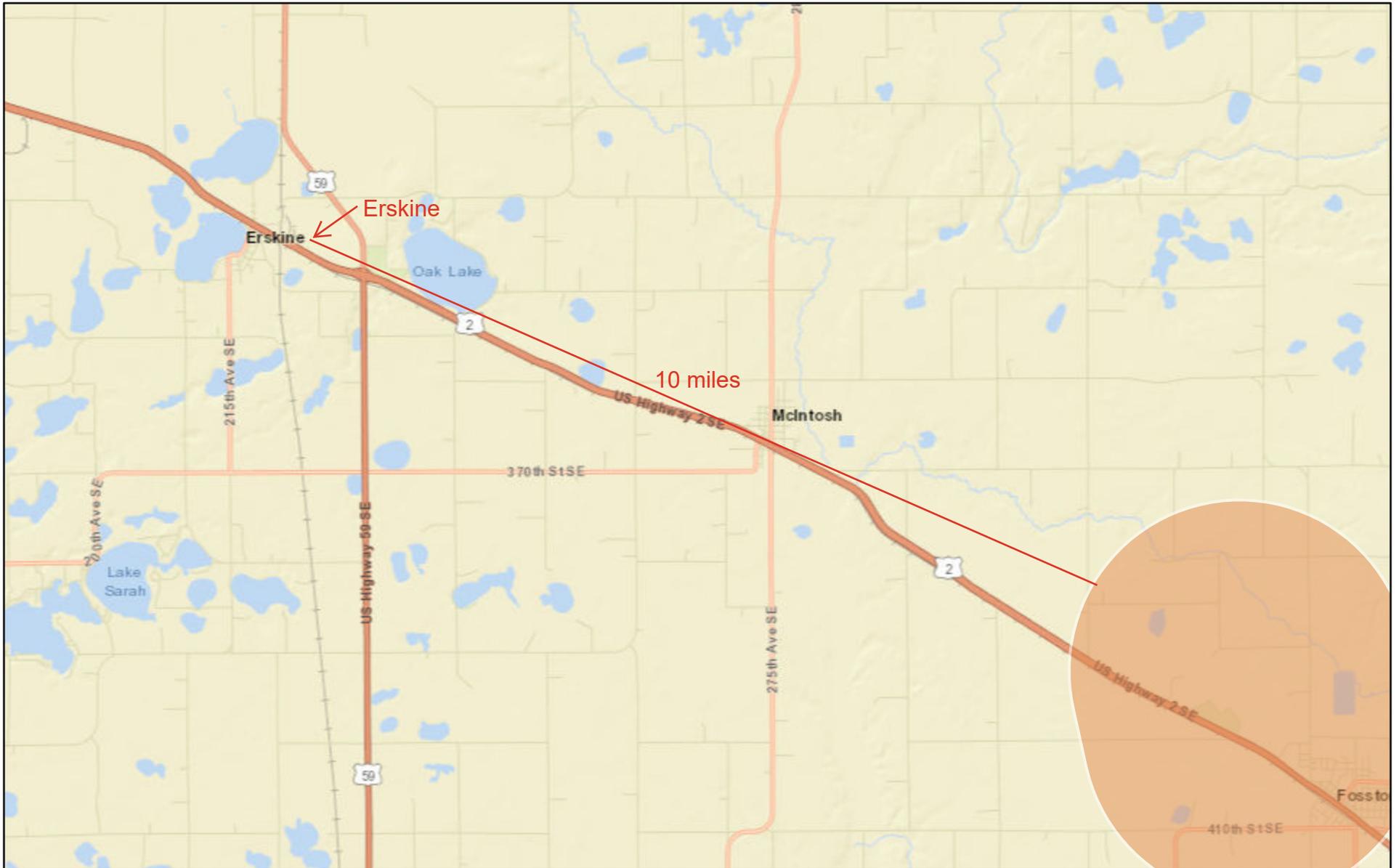
Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

According to the MNDOT Airport Influence Map, the City of Erskine is not situated within an Airport Influence Area. The nearest airport is Fosston Municipal Airport located approximately 10 miles to the southeast of the City. The closest military airport is located at Grand Forks AFB, approximately 67 miles northwest of Erskine. The project area is not within a Runway Potential Zone/Clear Zone (RPZ/CZ) or an Accident Potential Zone (APZ).

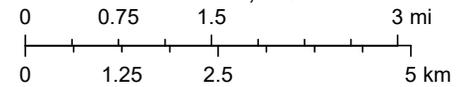
City of Erskine



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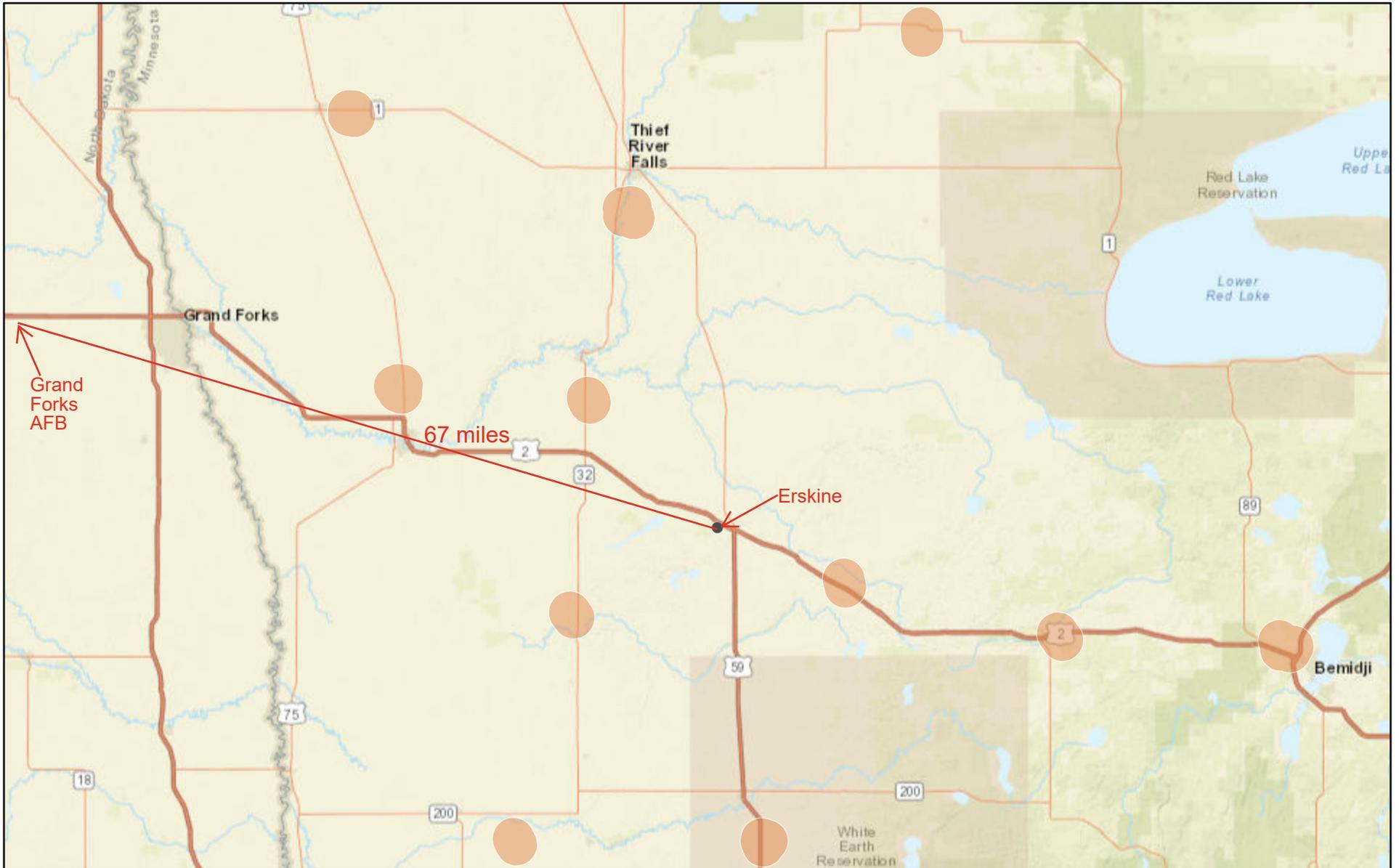
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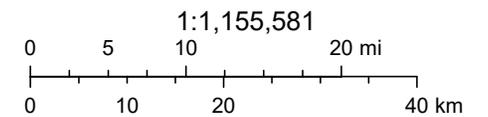
Esri, HERE, Garmin, NGA, USGS, NPS

City of Erskine Military Airport



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Coastal Barrier Resources (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/coastal-barrier-resources>

Projects located in the following states must complete this form.

| | | | | | |
|-------------|-----------|---------------|----------------|----------------|----------------|
| Alabama | Georgia | Massachusetts | New Jersey | Puerto Rico | Virgin Islands |
| Connecticut | Louisiana | Michigan | New York | Rhode Island | Virginia |
| Delaware | Maine | Minnesota | North Carolina | South Carolina | Wisconsin |
| Florida | Maryland | Mississippi | Ohio | Texas | |

1. Is the project located in a CBRS Unit?

- No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within a CBRS Unit.*
- Yes → *Continue to 2.*

Federal assistance for most activities may not be used at this location. You must either choose an alternate site or cancel the project. In very rare cases, federal monies can be spent within CBRS units for certain exempted activities (e.g., a nature trail), after consultation with the Fish and Wildlife Service (FWS) (see [16 USC 3505](#) for exceptions to limitations on expenditures).

2. Indicate your recommended course of action for the RE/HUD

- Consultation with the FWS
- Cancel the project

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

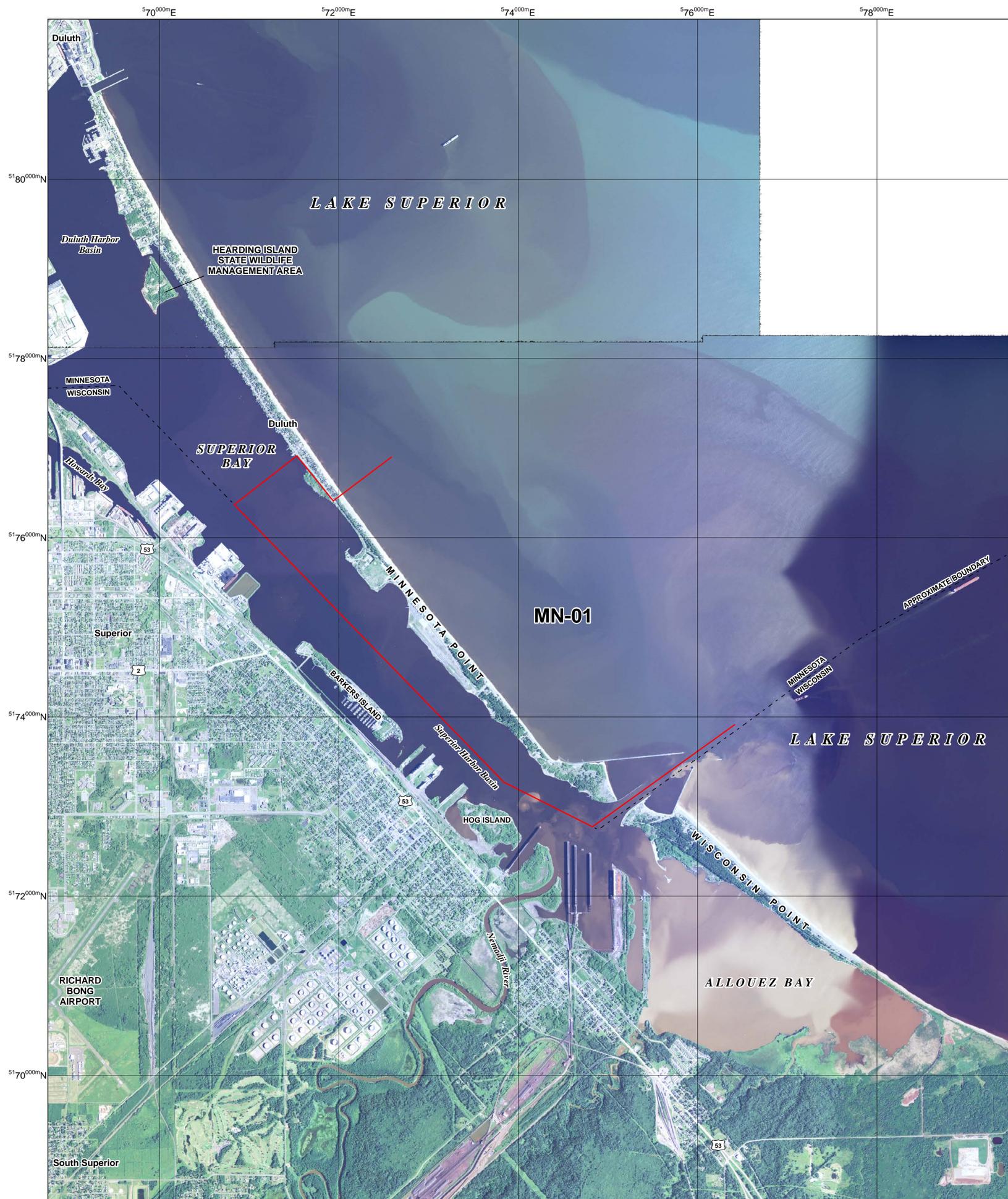
Include all documentation supporting your findings in your submission to HUD.



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The project is not located in a Coastal Barrier Resource Service (CBRS) area and has no impact on the CBRS area. The nearest CBRS area is MN-01 located near Duluth and about 194 miles southeast of Erskine.



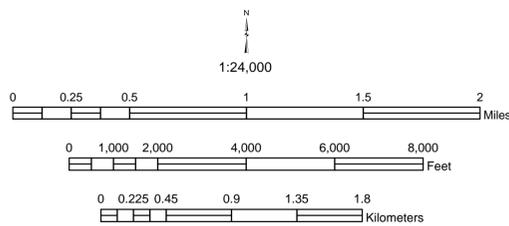
JOHN H. CHAFEE COASTAL BARRIER RESOURCES SYSTEM

Minnesota Point Unit MN-01

This map has been produced by the U.S. Fish and Wildlife Service as authorized by Section 4(c) of the Coastal Barrier Resources Act (CBRA) of 1982 (Pub. L. 97-348), as amended by the Coastal Barrier Improvement Act of 1990 (Pub. L. 101-591). The CBRA requires the Secretary of the Interior to review the maps of the Coastal Barrier Resources System (CBRS) at least once every 5 years and make any minor and technical modifications to the boundaries of the CBRS units as are necessary solely to reflect changes that have occurred in the size or location of any CBRS unit as a result of natural forces.

The seaward side of the CBRS unit includes the entire sand-sharing system, including the beach and nearshore area. The sand-sharing system of coastal barriers is normally defined by the 30-ft bathymetric contour. In large coastal embayments and the Great Lakes, the sand-sharing system is defined by the 20-ft bathymetric contour or a line approximately one mile seaward of the shoreline, whichever is nearer the coastal barrier.

For additional information about the CBRA or CBRS, please visit www.fws.gov/cbra.



- System Unit Boundary
- - - - Otherwise Protected Area (OPA) Boundary; OPAs are identified on the map by the letter "P" following the unit number
- - - - Approximate State Boundary
- $3654^{000m}N$ 2000- meter Universal Transverse Mercator grid values, Zone 15 North

Imagery Date(s): 2013
 Imagery Source(s): United States Department of Agriculture National Agriculture Imagery Program
 Coordinate System: North American Datum 1983 Universal Transverse Mercator, Zone 15 North

Map 27-001A January 11, 2016



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Flood Insurance (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/flood-insurance>

1. Does this project involve mortgage insurance, refinance, acquisition, repairs, rehabilitation, or construction of a structure, mobile home, or insurable personal property?

No. This project does not require flood insurance or is excepted from flood insurance.

→ Continue to the Worksheet Summary.

Yes → Continue to Question 2.

2. Provide a FEMA/FIRM map showing the site.

The Federal Emergency Management Agency (FEMA) designates floodplains. The [FEMA Map Service Center](#) provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs).

Is the structure, part of the structure, or insurable property located in a FEMA-designated Special Flood Hazard Area?

No → Continue to the Worksheet Summary.

Yes → Continue to Question 3.

3. Is the community participating in the National Flood Insurance Program or has less than one year passed since FEMA notification of Special Flood Hazards?

Yes, the community is participating in the National Flood Insurance Program.

Flood insurance is required. Provide a copy of the flood insurance policy declaration or a paid receipt for the current annual flood insurance premium and a copy of the application for flood insurance.

→ Continue to the Worksheet Summary.

Yes, less than one year has passed since FEMA notification of Special Flood Hazards.

If less than one year has passed since notification of Special Flood Hazards, no flood insurance is required.

→ Continue to the Worksheet Summary.

No. The community is not participating, or its participation has been suspended.

Federal assistance may not be used at this location. Cancel the project at this location.

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

According to the FEMA National Flood Hazard Layer, the project area is located in an unmapped zone, meaning FEMA has not assigned a specific flood hazard designation for this location. Based on available information, the project is not anticipated to impact any floodplains.



Community Status Book Report

Communities Participating in the National Flood Program

[Select here for not participating](#)



MINNESOTA

| CID | Community Name | County | Init FHBM Identified | Init FIRM Identified | Curr Eff Map Date | Tribal | Reg-Emer Date | CRS Entry Date | Curr Eff Date | Curr Class | % Disc |
|---------|--|------------------------------------|----------------------|----------------------|-------------------|-----------|-----------------|----------------|---------------|------------|--------|
| 270747A | OTSEGO, CITY OF | WRIGHT COUNTY | | 09/30/92 | 06/20/24 | No | 09/30/92 | | | | |
| | The Township of Frankfort CID 270746 was annexed mostly by St. Michael and smaller portions by Otsego and Albertville. | | | | | No | | | | | |
| 270339 | OTTER TAIL COUNTY * | OTTER TAIL COUNTY | 08/16/74 | | (NSFHA) | No | 05/15/85 | | | | |
| 270675 | OTTERTAIL, CITY OF | OTTER TAIL COUNTY | 02/27/76 | | (NSFHA) | No | 06/22/84 | | | | |
| 270463# | OWATONNA, CITY OF | STEELE COUNTY | 06/07/74 | 11/04/81 | 12/02/11 | No | 11/04/81 | | | | |
| 270004# | PALISADE, CITY OF | AITKIN COUNTY | 08/02/74 | 03/01/84 | 03/01/84 | No | 03/08/84 | | | | |
| 270196 | PARK RAPIDS, CITY OF | HUBBARD COUNTY | 06/07/74 | | (NSFHA) | No | 06/22/84 | | | | |
| 270452# | PAYNESVILLE, CITY OF | STEARNS COUNTY | 04/12/74 | 08/16/94 | 02/16/12 | No | 08/16/94 | | | | |
| 270340 | PELICAN RAPIDS, CITY OF | OTTER TAIL COUNTY | 05/03/74 | | (NSFHA) | No | 06/22/84 | | | | |
| 275331A | PEMBERTON, CITY OF | BLUE EARTH COUNTY | | 02/22/24 | (NSFHA) | No | 11/26/19 | | | | |
| 270651B | PENNINGTON COUNTY * | PENNINGTON COUNTY | 04/10/81 | 05/03/90 | 12/01/22 | No | 05/03/90 | | | | |
| 270250A | PEQUOT LAKES, CITY OF | CROW WING COUNTY | | 08/15/17 | 08/15/17(M) | No | 09/20/17 | | | | |
| 270326B | PERLEY, CITY OF | NORMAN COUNTY | 10/25/74 | 06/15/79 | 09/30/15 | No | 06/15/79 | | | | |
| 270128A | PETERSON, CITY OF | FILLMORE COUNTY | 08/30/74 | 05/05/81 | 08/15/19 | No | 05/05/81 | | | | |
| 270301A | PIERZ, CITY OF | MORRISON COUNTY | 06/07/74 | 07/31/24 | 07/31/24 | No | 01/03/85 | | | | |
| 270348# | PINE CITY, CITY OF | PINE COUNTY | 12/28/73 | 12/01/81 | 04/03/12 | No | 12/01/81 | | | | |
| 270704# | PINE COUNTY * | PINE COUNTY | 12/23/77 | 11/20/91 | 04/03/12 | No | 04/07/92 | | | | |
| 270145B | PINE ISLAND, CITY OF | OLMSTED COUNTY/GOODHUE COUNTY | 05/24/74 | 03/02/81 | 09/21/23(M) | No | 03/02/81 | | | | |
| 270917# | PINE LAKE, TOWNSHIP OF | PINE COUNTY | | 04/03/12 | 04/03/12(M) | No | 06/01/16 | | | | |
| 270627A | PIPESTONE COUNTY* | PIPESTONE COUNTY | 07/27/79 | 07/03/86 | 04/25/24 | No | 07/03/86 | | | | |
| 270359A | PIPESTONE, CITY OF | PIPESTONE COUNTY | 05/03/74 | 02/15/91 | 04/25/24 | No | 02/15/91 | | | | |
| 270753# | PLAINVIEW, CITY OF | WABASHA COUNTY | | 06/20/00 | (NSFHA) | No | 10/06/06 | | | | |
| 270596A | PLATO, CITY OF | MCLEOD COUNTY | 11/01/74 | 07/07/14 | 07/07/14(M) | No | 07/07/14 | | | | |
| 270390A | PLUMMER, CITY OF | RED LAKE COUNTY | 08/23/74 | 03/09/21 | 03/09/21(M) | No | 06/22/84 | | | | |
| 270179B | PLYMOUTH, CITY OF | HENNEPIN COUNTY | 02/08/74 | 05/15/78 | 11/04/16 | No | 05/15/78 | | | | |
| 270503# | POLK COUNTY * | POLK COUNTY | 12/30/77 | 08/15/83 | 08/15/83 | No | 08/15/83 | | | | |
| 270368A | POPE COUNTY* | POPE COUNTY | 12/23/77 | 08/19/87 | 09/26/24 | No | 08/19/87 | | | | |
| 270547A | PORTER, CITY OF | YELLOW MEDICINE COUNTY | 06/28/74 | 10/07/21 | 10/07/21(M) | No | 10/07/21 | | | | |
| 270903# | PRAIRIE ISLAND INDIAN COMMUNITY | DAKOTA COUNTY/GOODHUE COUNTY | | 09/25/09 | 09/25/09 | Yes | 02/22/11 | | | | |
| 270129A | PRESTON, CITY OF | FILLMORE COUNTY | 05/10/74 | 08/01/79 | 08/15/19 | No | 08/01/79 | | | | |
| 270292# | PRINCETON, CITY OF | SHERBURNE COUNTY/MILLE LACS COUNTY | 05/10/74 | 06/15/81 | 03/04/13 | No | 06/15/81 | | | | |
| 270948# | PRINCETON, TOWNSHIP OF | MILLE LACS COUNTY | 02/02/79 | 03/04/13 | 03/04/13 | No | 05/07/13 | | | | |
| 270432A | PRIOR LAKE, CITY OF | SCOTT COUNTY | 07/26/74 | 09/29/78 | 02/12/21 | No | 09/29/78 | | | | |
| 270425A | PROCTOR, CITY OF | ST. LOUIS COUNTY | 04/05/75 | 03/02/81 | 03/25/25 | No | 03/02/81 | | | | |
| 270681A | RAMSEY, CITY OF | ANOKA COUNTY | 04/21/78 | 11/01/79 | 12/16/15 | No | 11/01/79 | | | | |
| 270302A | RANDALL, CITY OF | MORRISON COUNTY | 06/07/74 | 03/02/81 | 07/31/24 | No | 03/02/81 | | | | |
| 270112# | RANDOLPH, CITY OF | DAKOTA COUNTY | 07/19/74 | 07/16/80 | 12/02/11 | No | 07/16/80 | | | | |
| 270238A | RANIER, CITY OF | KOOCHICHING COUNTY | 08/09/74 | 09/27/91 | 11/17/22 | No | 09/27/91 | | | | |



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-1000

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Air Quality (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/air-quality>

- 1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?**

Yes → *Continue to Question 2.*

No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Provide any documents used to make your determination.*

- 2. Is your project’s air quality management district or county in non-attainment or maintenance status for any criteria pollutants?**

Follow the link below to determine compliance status of project county or air quality management district:

<http://www.epa.gov/oaqps001/greenbk/>

No, project’s county or air quality management district is in attainment status for all criteria pollutants

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.*

Yes, project’s management district or county is in non-attainment or maintenance status for one or more criteria pollutants. → *Continue to Question 3.*

- 3. Determine the estimated emissions levels of your project for each of those criteria pollutants that are in non-attainment or maintenance status on your project area. Will your project exceed any of the *de minimis* or *threshold* emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?**

No, the project will not exceed *de minimis* or threshold emissions levels or screening levels

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Explain how you determined that the project would not exceed *de minimis* or threshold emissions.*

Yes, the project exceeds *de minimis* emissions levels or screening levels.

→ *Continue to Question 4. Explain how you determined that the project would not exceed de minimis or threshold emissions in the Worksheet Summary.*

- 4. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.**

[Click here to enter text.](#)

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

The project is not located within a non-attainment area. Air quality currently in the area is considered "Good" with a PM_{2.5}=45. Construction from the project has potential to create minor dust issues. The contract specification will require minimal dust and air impacts.



ZIP Code, City, or State

Braham, MN

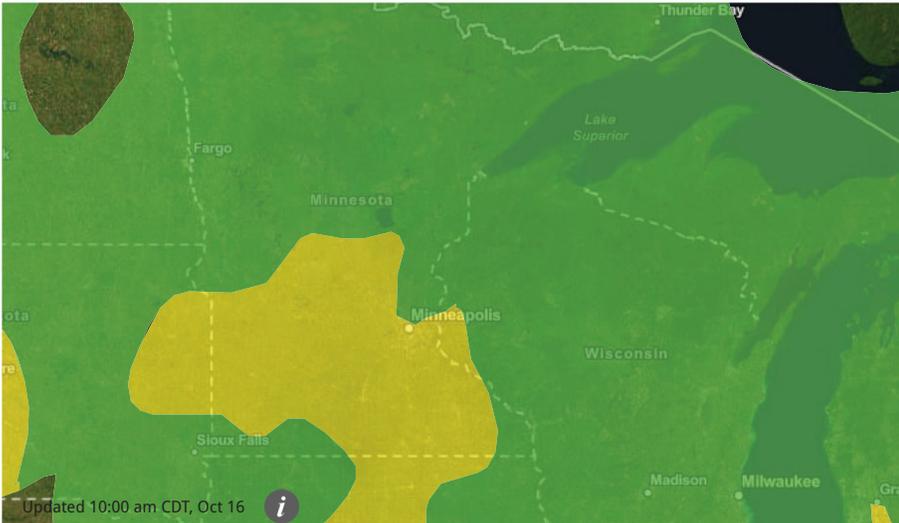
East Central Minnesota Reporting Area

Monitors Near Me (<https://gispub.epa.gov/airnow/?xmin=-10445333.938848533&ymin=5677734.974651963&xmax=-10296618.056616897&ymax=5771777.6010951465&clayer=none&mlayer=ozonepm>)

[Recent Trends \(/trends/?cityName&stateName&countryCode\)](#)

[\(https://www.epa.gov/\)](https://www.epa.gov/)
and [PARTNERS \(/partners\)](#)

Data Providers



National Maps

Primary Pollutant

This pollutant currently has the highest AQI in the area.



PM2.5 **45** Good

Enjoy your outdoor activities.



OZONE **17** Good

Air Quality Forecast

Forecast courtesy of

Minnesota Pollution Control Agency (<http://www.pca.state.mn.us/index.php/air/index.html>)

Forecast Discussion: KEY MESSAGES: Air quality in the Green (good) AQI category is expected statewide Wednesday. Air quality may reach the Yellow (moderate) cate...

[Full Forecast Discussion](#)

| Today | Tomorrow | Saturday |
|---------------|---------------|---------------|
| Good OZONE | Good OZONE | Good OZONE |

▼

Primary Pollutant

OZONE **31** Good

Enjoy your outdoor activities.

▶

PM2.5 **28** Good

Explore

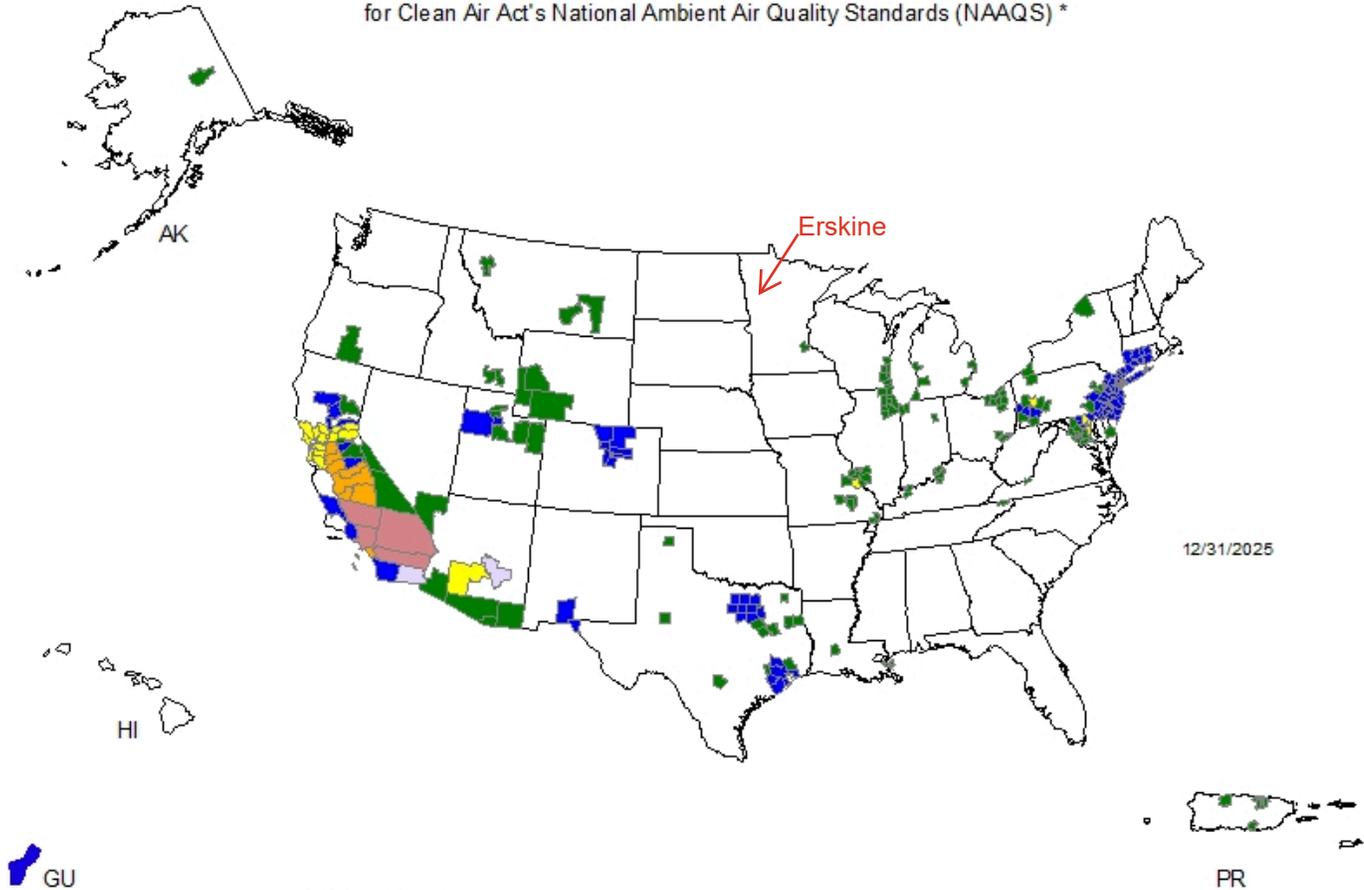
| | | |
|--|---|--|
| <p>Current Fire Conditions</p>  <p>(/wildfires)</p> | <p>Archived Dates</p>  <p>(https://gispub.epa.gov/airnow/index.html?tab=3)</p> | <p>Webcams</p>  <p>(/resources/web-cams)</p> |
| <p>Air Quality Flag Program</p>  <p>(/air-quality-flag-program)</p> | <p>Email Notifications</p>  <p>(http://www.enviroflash.info/)</p> | |

AirNow.gov - Home of the U.S. Air Quality Index

[Home \(/\)](#) | [Site Map \(/site-map\)](#) | [Contact Us \(/contact-us\)](#) | [Accessibility \(https://www.epa.gov/accessibility/epa-accessibility-statement\)](https://www.epa.gov/accessibility/epa-accessibility-statement)

Counties Designated "Nonattainment"

for Clean Air Act's National Ambient Air Quality Standards (NAAQS) *



Legend **

- County Designated Nonattainment for 6 NAAQS Pollutants
- County Designated Nonattainment for 5 NAAQS Pollutants
- County Designated Nonattainment for 4 NAAQS Pollutants
- County Designated Nonattainment for 3 NAAQS Pollutants
- County Designated Nonattainment for 2 NAAQS Pollutants
- County Designated Nonattainment for 1 NAAQS Pollutant

*The National Ambient Air Quality Standards (NAAQS) are health standards for Carbon Monoxide, Lead (1978 and 2008), Nitrogen Dioxide, 8-hour Ozone (2008), Particulate Matter (PM-10 and PM-2.5 (1997, 2006 and 2012), and Sulfur Dioxide.(1971 and 2010)

** Included in the counts are counties designated for NAAQS and revised NAAQS pollutants. Revoked 1-hour (1979) and 8-hour Ozone (1997) are excluded. Partial counties, those with part of the county designated nonattainment and part attainment, are shown as full counties on the map.



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
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Coastal Zone Management Act (CEST and EA) – PARTNER

<https://www.onecpd.info/environmental-review/coastal-zone-management>

Projects located in the following states must complete this form.

| | | | | | |
|-----------------|----------|---------------|--------------------------|----------------|----------------|
| Alabama | Florida | Louisiana | Mississippi | Ohio | Texas |
| Alaska | Georgia | Maine | New Hampshire | Oregon | Virgin Islands |
| American Samona | Guam | Maryland | New Jersey | Pennsylvania | Virginia |
| California | Hawaii | Massachusetts | New York | Puerto Rico | Washington |
| Connecticut | Illinois | Michigan | North Carolina | Rhode Island | Wisconsin |
| Delaware | Indiana | Minnesota | Northern Mariana Islands | South Carolina | |

1. Is the project located in, or does it affect, a Coastal Zone as defined in your state Coastal Management Plan?

- Yes → Continue to Question 2.
- No → If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing that the site is not within a Coastal Zone.

2. Does this project include activities that are subject to state review?

- Yes → Continue to Question 3.
- No → If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination.

3. Has this project been determined to be consistent with the State Coastal Management Program?

- Yes, with mitigation. → The RE/HUD must work with the State Coastal Management Program to develop mitigation measures to mitigate the impact or effect of the project.
- Yes, without mitigation. → If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination.
- No → Project cannot proceed at this location.

Worksheet Summary

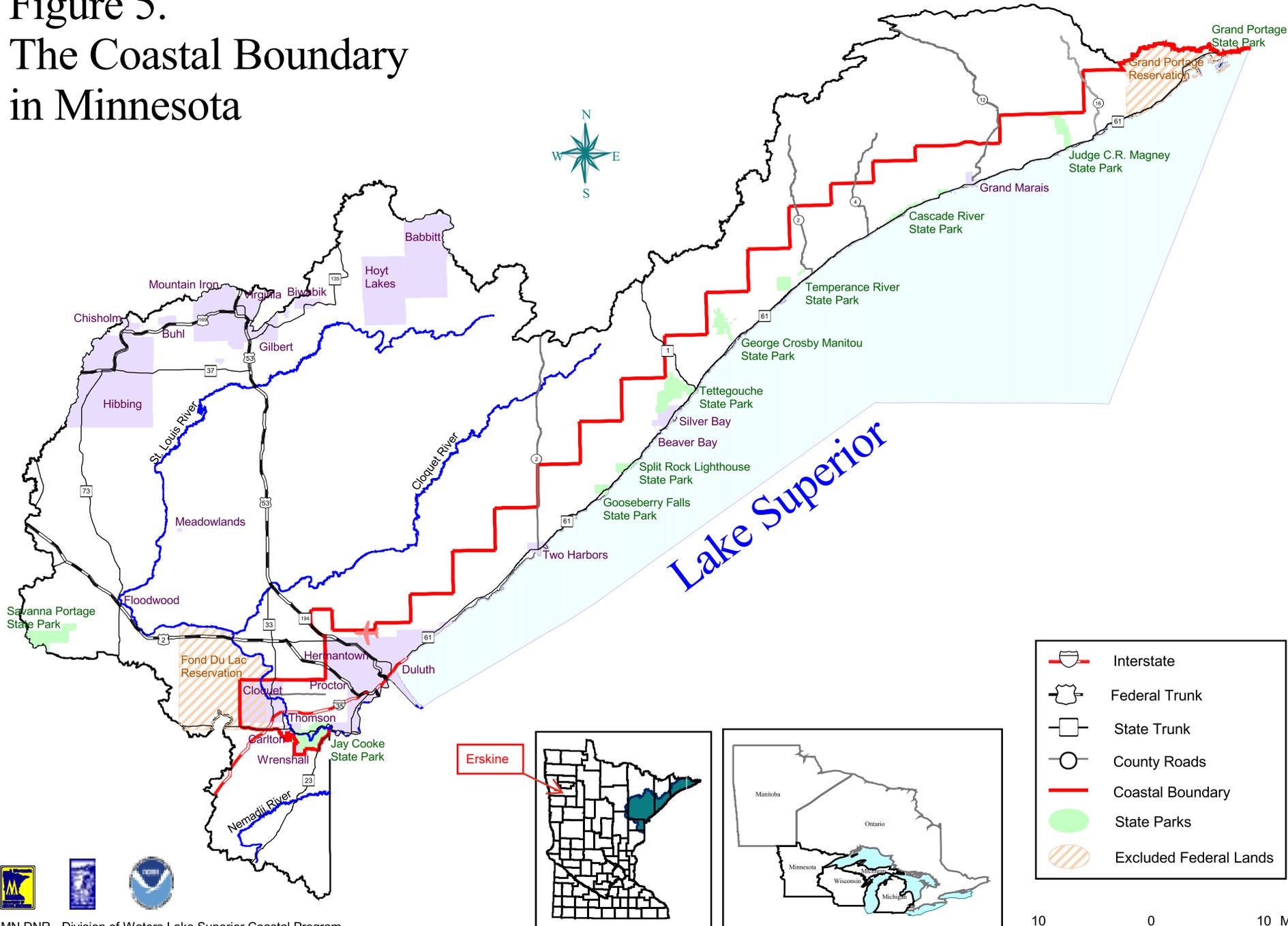
Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

The project is not located within a Coastal Zone Management (CZM) area. The only CZM area in Minnesota is located along the coast of Lake Superior in northern Minnesota approximately 189 miles southeast of Erskine.

Figure 5. The Coastal Boundary in Minnesota





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Contamination and Toxic Substances (Multifamily and Non-Residential Properties) – PARTNER

<https://www.hudexchange.info/programs/environmental-review/site-contamination>

1. How was site contamination evaluated? ¹ Select all that apply.

- ASTM Phase I ESA
- ASTM Phase II ESA
- Remediation or clean-up plan
- ASTM Vapor Encroachment Screening
- None of the above

→ Provide documentation and reports and include an explanation of how site contamination was evaluated in the Worksheet Summary.

Continue to Question 2.

2. Were any on-site or nearby toxic, hazardous, or radioactive substances found that could affect the health and safety of project occupants or conflict with the intended use of the property? (Were any recognized environmental conditions or RECs identified in a Phase I ESA and confirmed in a Phase II ESA?)

- No → Explain below.

A review of the Minnesota Pollution Control Agency’s (MPCA) What’s in My Neighborhood database and the U.S. Environmental Protection Agency’s NEPAAssist tool confirmed that there are no hazardous waste sites or toxic release facilities located on the water tower site. Because all work will be confined to the existing water tower footprint and previously disturbed areas, the project will not encounter or create any impacts related to hazardous waste or toxic substances.

In the event that contaminated soil, groundwater, or hazardous materials are encountered during construction, work will cease in the affected area, and appropriate

¹ HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site. For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD’s toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.

measures will be implemented in accordance with MPCA and EPA regulations. The contractor will be responsible for the proper handling, characterization, and disposal of any hazardous materials in compliance with all applicable federal and state requirements.

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.*

Yes → *Describe the findings, including any recognized environmental conditions (RECs), in Worksheet Summary below. Continue to Question 3.*

3. Can adverse environmental impacts be mitigated?

Adverse environmental impacts cannot feasibly be mitigated HUD assistance may not be used for the project at this site. Project cannot proceed at this location.

Yes, adverse environmental impacts can be eliminated through mitigation.

→ *Provide all mitigation requirements² and documents. Continue to Question 4.*

4. Describe how compliance was achieved. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls³, or use of institutional controls⁴.

[Click here to enter text.](#)

If a remediation plan or clean-up program was necessary, which standard does it follow?

Complete removal

Risk-based corrective action (RBCA)

→ *Continue to the Worksheet Summary.*

Worksheet Summary

² Mitigation requirements include all clean-up actions required by applicable federal, state, tribal, or local law. Additionally, provide, as applicable, the long-term operations and maintenance plan, Remedial Action Work Plan, and other equivalent documents.

³ Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, without limitation, caps, covers, dikes, trenches, leachate collection systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, without limitation, slurry walls and ground water pumping systems.

⁴ Institutional controls are mechanisms used to limit human activities at or near a contaminated site, or to ensure the effectiveness of the remedial action over time, when contaminants remain at a site at levels above the applicable remediation standard which would allow for unrestricted use of the property. Institutional controls may include structure, land, and natural resource use restrictions, well restriction areas, classification exception areas, deed notices, and declarations of environmental restrictions.

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

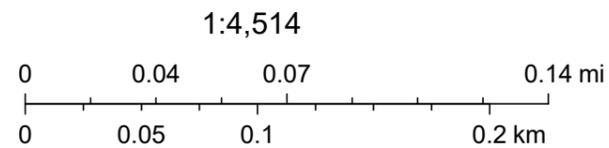
Include all documentation supporting your findings in your submission to HUD.

MPCA Sites



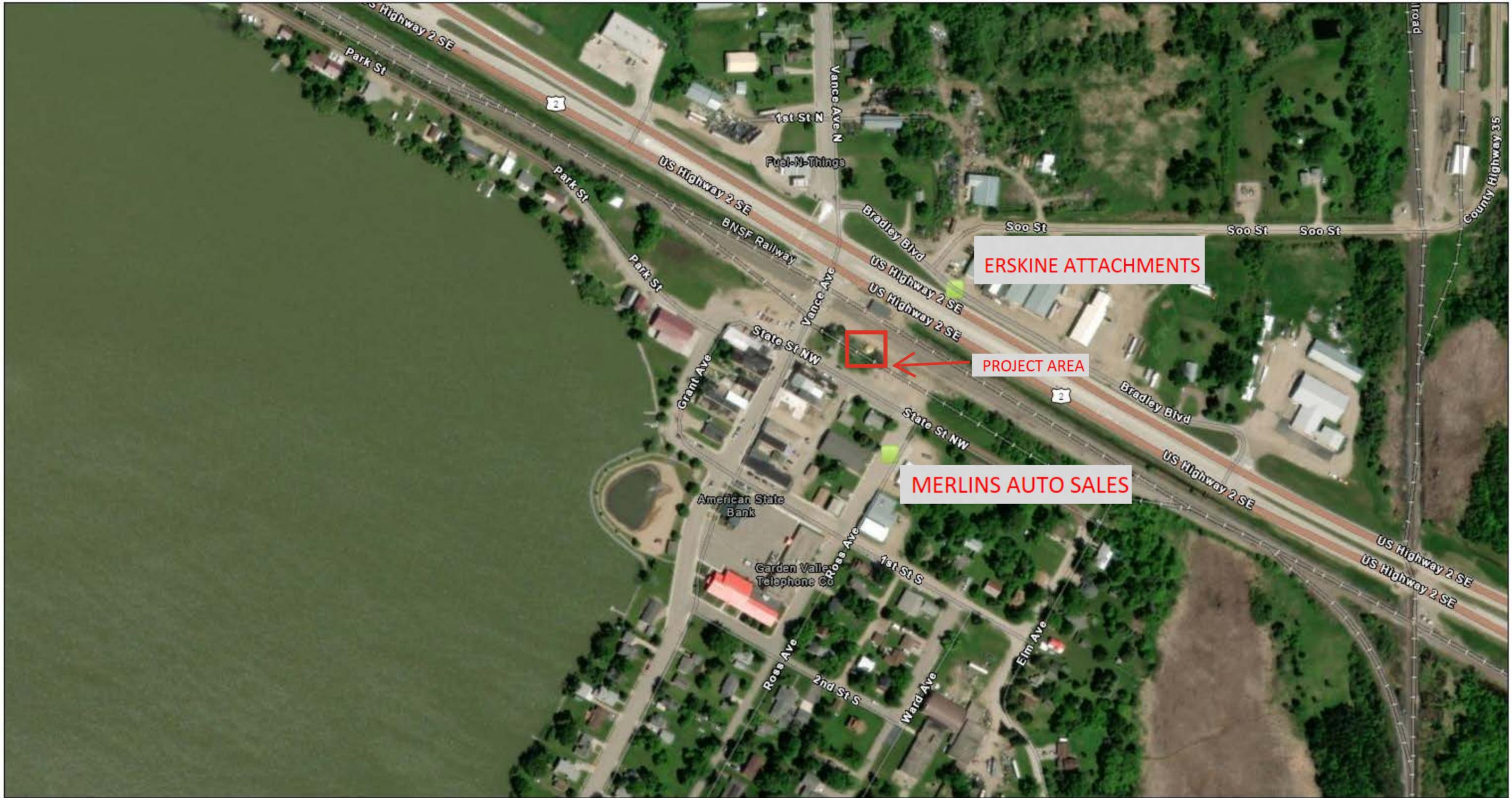
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- program
- Solid Waste
 - Stormwater
 - ▲ Tanks
 - ▲ Water Quality
 - Multiple Programs
 - Hazardous Waste
 - Investigation and Cleanup



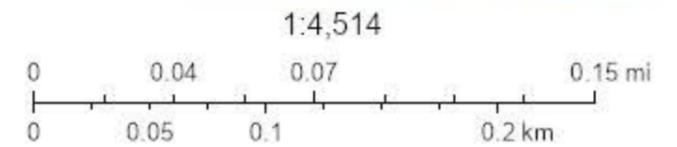
MPCA, Source: Esri, USDA FSA, Source: Esri, Vantor, Earthstar Geographics, and the GIS User Community, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community

EPA Facilities



January 12, 2026

-  Hazardous Waste (RCRAInfo)
-  Air Pollution (ICIS-AIR)



Vantor, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community



Detailed Facility Report

Facility Summary

ERSKINE ATTACHMENTS

121 BRADLEY BLVD, ERSKINE, MN 56535

FRS (Facility Registry Service) ID: 110003736119

EPA Region: 05

Latitude: 47.66871

Longitude: -96.00795

Locational Data Source: FRS

Industries: Fabricated Metal Product Manufacturing

Indian Country: N

Enforcement and Compliance Summary

| Statute | CAA |
|---|-------------------------|
| Compliance Monitoring Activities (5 years) | -- |
| Date of Last Compliance Monitoring Activity | -- |
| Compliance Status | No Violation Identified |
| Qtrs in Noncompliance (of 12) | 0 |
| Qtrs with Significant Violation | 0 |
| Informal Enforcement Actions (5 years) | -- |
| Formal Enforcement Actions (5 years) | -- |
| Penalties from Formal Enforcement Actions (5 years) | -- |
| EPA Cases (5 years) | -- |
| Penalties from EPA Cases (5 years) | -- |
| Statute | RCRA |
| Compliance Monitoring Activities (5 years) | -- |
| Date of Last Compliance Monitoring Activity | -- |
| Compliance Status | No Violation Identified |
| Qtrs in Noncompliance (of 12) | 0 |
| Qtrs with Significant Violation | 0 |
| Informal Enforcement Actions (5 years) | -- |
| Formal Enforcement Actions (5 years) | -- |
| Penalties from Formal Enforcement Actions (5 years) | -- |
| EPA Cases (5 years) | -- |
| Penalties from EPA Cases (5 years) | -- |

Regulatory Information

Clean Air Act (CAA): Permanently Closed Major (MN0000002711900079)

Clean Water Act (CWA): No Information

Resource Conservation and Recovery Act (RCRA): Active VSQG, (MN0000804633)

Safe Drinking Water Act (SDWA): No Information

Go To Enforcement/Compliance Details

Known Data Problems <<https://epa.gov/resources/echo-data/known-data-problems>>

Other Regulatory Reports

Air Emissions Inventory (EIS): No Information

Greenhouse Gas Emissions (eGGRT): No Information

Toxic Releases (TRI): 5653WRSKNT121BR

Compliance and Emissions Data Reporting Interface (CEDRI): No Information

Facility/System Characteristics

Facility/System Characteristics

| System | Statute | Identifier | Universe | Status | Areas | Permit Expiration Date | Indian Country | Latitude | Longitude |
|----------|---------|--------------------|--------------------------|------------------------|-------|------------------------|----------------|-----------|------------|
| FRS | | 110003736119 | | | | | N | 47.66871 | -96.00795 |
| ICIS-Air | CAA | MN0000002711900079 | Major Emissions | Permanently Closed | | | N | 47.668759 | -96.007121 |
| TRI | EP313 | 5653WRSKNT121BR | Toxics Release Inventory | Last Reported for 2011 | | | N | 47.66871 | -96.00795 |
| RCRAInfo | RCRA | MN0000804633 | VSQG | Active (H) | | | N | 47.672627 | -96.005991 |

Facility Address

| System | Statute | Identifier | Facility Name | Facility Address | Facility County |
|----------|---------|--------------------|-------------------------|--------------------------------------|-----------------|
| FRS | | 110003736119 | ERSKINE ATTACHMENTS | 121 BRADLEY BLVD, ERSKINE, MN 56535 | Polk County |
| ICIS-Air | CAA | MN0000002711900079 | ERSKINE ATTACHMENTS | 121 BRADLEY BLVD, ERSKINE, MN 56535 | Polk County |
| TRI | EP313 | 5653WRSKNT121BR | ERSKINE ATTACHMENTS | 121 BRADLEY BLVD., ERSKINE, MN 56535 | Polk County |
| RCRAInfo | RCRA | MN0000804633 | ERSKINE ATTACHMENTS INC | 121 BRADLEY BLVD, ERSKINE, MN 56535 | Polk County |

Facility SIC (Standard Industrial Classification) Codes

| System | Identifier | SIC Code | SIC Description |
|----------|--------------------|----------|------------------------------|
| ICIS-Air | MN0000002711900079 | 3523 | Farm Machinery And Equipment |

Facility NAICS (North American Industry Classification System) Codes

| System | Identifier | NAICS Code | NAICS Description |
|----------|--------------------|------------|--|
| TRI | 5653WRSKNT121BR | 333111 | Farm Machinery and Equipment Manufacturing |
| ICIS-Air | MN0000002711900079 | 332212 | Hand and Edge Tool Manufacturing |
| ICIS-Air | MN0000002711900079 | 333111 | Farm Machinery and Equipment Manufacturing |
| RCRAInfo | MN0000804633 | 333111 | Farm Machinery and Equipment Manufacturing |

Facility Tribe Information

| Reservation Name | Tribe Name | EPA Tribal ID | Distance to Tribe (miles) |
|-------------------------|--|---------------|---------------------------|
| White Earth Reservation | Minnesota Chippewa Tribe, Minnesota (White Earth Band) | 100000576 | 12 |
| Red Lake Reservation | Red Lake Band of Chippewa Indians, Minnesota | 100000237 | 22 |

Enforcement and Compliance

Compliance Monitoring History

Last 5 Years

| Statute | Source ID | System | Activity Type | Compliance Monitoring Type | Lead Agency | Date | Finding (if applicable) |
|---------|-----------|--------|---------------|----------------------------|-------------|------|-------------------------|
|---------|-----------|--------|---------------|----------------------------|-------------|------|-------------------------|

No data records returned

Entries in italics are not included in ECHO's Compliance Monitoring Activity counts because they are not compliance monitoring strategy

<<https://www.epa.gov/compliance/compliance-monitoring-programs>> activities or because they are not counted as inspections within EPA's Annual Results

<<https://www.epa.gov/enforcement/enforcement-data-and-results>>.

Compliance Summary Data

| Statute | Source ID | Current SNC (Significant Noncompliance)/HPV (High Priority Violation) | Current As Of | Qtrs with NC (Noncompliance) (of 12) | Data Last Refreshed |
|---------|--------------------|---|---------------|--------------------------------------|---------------------|
| CAA | MN0000002711900079 | No | 01/10/2026 | 0 | 01/09/2026 |
| RCRA | MN0000804633 | No | 01/10/2026 | 0 | 01/09/2026 |

Three-Year Compliance History by Quarter

| Statute | Program/Pollutant/Violation Type | QTR 1 | QTR 2 | QTR 3 | QTR 4 | QTR 5 | QTR 6 | QTR 7 | QTR 8 | QTR 9 | QTR 10 | QTR 11 |
|-------------------------------------|----------------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| CAA (Source ID: MN0000002711900079) | | 01/01-03/31/23 | 04/01-06/30/23 | 07/01-09/30/23 | 10/01-12/31/23 | 01/01-03/31/24 | 04/01-06/30/24 | 07/01-09/30/24 | 10/01-12/31/24 | 01/01-03/31/25 | 04/01-06/30/25 | 07/01-09/30/25 |
| | Facility-Level Status | No Violation Identified |
| | HPV History | | | | | | | | | | | |
| | Violation Type | Agency | Programs | Pollutants | | | | | | | | |

| Statute | Program/Pollutant/Violation Type | QTR 1 | QTR 2 | QTR 3 | QTR 4 | QTR 5 | QTR 6 | QTR 7 | QTR 8 | QTR 9 | QTR 10 | QTR 11 |
|---------------------------------|----------------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| RCRA (Source ID: MN00000804633) | | 01/01-03/31/23 | 04/01-06/30/23 | 07/01-09/30/23 | 10/01-12/31/23 | 01/01-03/31/24 | 04/01-06/30/24 | 07/01-09/30/24 | 10/01-12/31/24 | 01/01-03/31/25 | 04/01-06/30/25 | 07/01-09/30/25 |
| | Facility-Level Status | No Violation Identified |
| | Violation | Agency | | | | | | | | | | |

Informal Enforcement Actions

| Statute | System | Source ID | Type of Action | Lead Agency | Date |
|---------|--------|-----------|----------------|-------------|------|
|---------|--------|-----------|----------------|-------------|------|

No data records returned

Entries in italics are not counted as "informal enforcement actions" in EPA policies pertaining to enforcement response tools.

Formal Enforcement Actions

| Statute | System | Law/Section | Source ID | Type of Action | Case No. | Lead Agency | Case Name | Issued/Filed Date | Settlements/Actions | Settlement/Action Date | Federal Penalty Assessed | State/Local Penalty Assessed | Penalty Amount Collected | SEP Value | Comp Action Cost |
|---------|--------|-------------|-----------|----------------|----------|-------------|-----------|-------------------|---------------------|------------------------|--------------------------|------------------------------|--------------------------|-----------|------------------|
|---------|--------|-------------|-----------|----------------|----------|-------------|-----------|-------------------|---------------------|------------------------|--------------------------|------------------------------|--------------------------|-----------|------------------|

No data records returned

Environmental Conditions

Watersheds

| 12-Digit WBD (Watershed Boundary Dataset) HUC (RAD (Reach Address Database)) | WBD (Watershed Boundary Dataset) Subwatershed Name (RAD (Reach Address Database)) | State Water Body Name (ICIS (Integrated Compliance Information System)) | Beach Closures Within Last Year | Beach Closures Within Last Two Years | Pollutants Potentially Related to Impairment | Watershed with ESA (Endangered Species Act)-listed Aquatic Species? |
|--|---|---|---------------------------------|--------------------------------------|--|---|
|--|---|---|---------------------------------|--------------------------------------|--|---|

No data records returned

Assessed Waters From Latest State Submission (ATTAINS)

| State | Report Cycle | Assessment Unit ID | Assessment Unit Name | Water Condition | Cause Groups Impaired | Drinking Water Use | Ecological Use | Fish Consumption Use | Recreation Use | Other Use |
|-------|--------------|--------------------|----------------------|-----------------|-----------------------|--------------------|----------------|----------------------|----------------|-----------|
|-------|--------------|--------------------|----------------------|-----------------|-----------------------|--------------------|----------------|----------------------|----------------|-----------|

No data records returned

Air Quality Nonattainment Areas

| Pollutant | Within Nonattainment Status Area? | Nonattainment Status Applicable Standard(s) | Within Maintenance Status Area? | Maintenance Status Applicable Standard(s) |
|-----------|-----------------------------------|---|---------------------------------|---|
|-----------|-----------------------------------|---|---------------------------------|---|

No data records returned

Pollutants

Toxics Release Inventory History of Reported Chemicals Released or Transferred in Pounds per Year at Site

| TRI Facility ID | Year | Air Emissions | Surface Water Discharges | Off-Site Transfers to POTWs (Publicly Owned Treatment Works) | Underground Injections | Disposal to Land | Total On-Site Releases | Total Off-Site Transfers |
|-----------------|------|---------------|--------------------------|--|------------------------|------------------|------------------------|--------------------------|
|-----------------|------|---------------|--------------------------|--|------------------------|------------------|------------------------|--------------------------|

No data records returned

Toxics Release Inventory Total Releases and Transfers in Pounds by Chemical and Year

| Chemical Name |
|---------------|
|---------------|

No data records returned

Community

Demographic Profile of Surrounding Area (1-Mile Radius)

This section provides demographic information regarding the community surrounding the facility. ECHO compliance data alone are not sufficient to determine whether violations at a particular facility had negative impacts on public health or the environment. Statistics are based upon the 2023 American Community Survey (ACS) 5-year Summary and are accurate to the extent that the facility latitude and longitude listed below are correct. Census boundaries and demographic data for U.S. Territories are based on the "2020 Island Areas Demographic Profiles" from the U.S. Census Bureau. EPA's spatial processing methodology considers the overlap between the selected radii and ACS census block groups in determining the demographics surrounding the facility. For more detail about this methodology, see the DFR Data Dictionary <<https://epa.gov/help/reports/dfr-data-dictionary#demographic>>.

| General Statistics (ACS (American Community Survey)) | |
|--|-----------|
| Total Persons | 61 |
| Population Density | 21/sq.mi. |
| Housing Units in Area | 32 |
| Percent People of Color | 8% |
| Households in Area | 26 |
| Households on Public Assistance | 3 |
| Persons With Low Income | 22 |
| Percent With Low Income | 36% |

| Geography | |
|-------------------------|-------------|
| Radius of Selected Area | 1 mi. |
| Center Latitude | 47.66871 |
| Center Longitude | -96.00795 |
| Total Area | 3.14 sq.mi. |
| Land Area | 94% |
| Water Area | 6% |

| Income Breakdown (ACS (American Community Survey)) - Households (%) | |
|---|---------|
| Less than \$15,000 | 3 (12%) |
| \$15,000 - \$25,000 | 5 (20%) |
| \$25,000 - \$50,000 | 5 (20%) |
| \$50,000 - \$75,000 | 4 (16%) |
| Greater than \$75,000 | 8 (32%) |

| Age Breakdown (ACS (American Community Survey)) - Persons (%) | |
|---|----------|
| Children 5 years and younger | 6 (10%) |
| Minors 17 years and younger | 18 (30%) |
| Adults 18 years and older | 44 (72%) |
| Seniors 65 years and older | 11 (18%) |

| Race Breakdown (ACS (American Community Survey)) - Persons (%) | |
|--|----------|
| White | 57 (93%) |
| African-American | 0 (0%) |
| Hispanic-Origin | 2 (3%) |
| Asian | 1 (2%) |
| Hawaiian/Pacific Islander | 0 (0%) |
| American Indian | 0 (0%) |
| Other/Multiracial | 1 (2%) |

| Education Level (Persons 25 & older) (ACS (American Community Survey)) - Persons (%) | |
|--|-------------|
| Less than 9th Grade | 1 (2.56%) |
| 9th through 12th Grade | 3 (7.69%) |
| High School Diploma | 15 (38.46%) |
| Some College/2-year | 6 (15.38%) |
| B.S./B.A. (Bachelor of Science/Bachelor of Arts) or More | 4 (10.26%) |



Detailed Facility Report

Facility Summary

MERLINS AUTO SALES

104 ROSS AVE, ERSKINE, MN 56535

FRS (Facility Registry Service) ID: 110003844868

EPA Region: 05

Latitude: 47.66751

Longitude: -96.00865

Locational Data Source: FRS

Industries: --

Indian Country: N

Enforcement and Compliance Summary

| Statute | RCRA |
|---|-------------------------|
| Compliance Monitoring Activities (5 years) | -- |
| Date of Last Compliance Monitoring Activity | -- |
| Compliance Status | No Violation Identified |
| Qtrs in Noncompliance (of 12) | 0 |
| Qtrs with Significant Violation | 0 |
| Informal Enforcement Actions (5 years) | -- |
| Formal Enforcement Actions (5 years) | -- |
| Penalties from Formal Enforcement Actions (5 years) | -- |
| EPA Cases (5 years) | -- |
| Penalties from EPA Cases (5 years) | -- |

Regulatory Information

Clean Air Act (CAA): No Information

Clean Water Act (CWA): No Information

Resource Conservation and Recovery Act (RCRA): Inactive Other, (MND985694264)

Safe Drinking Water Act (SDWA): No Information

Other Regulatory Reports

Air Emissions Inventory (EIS): No Information

Greenhouse Gas Emissions (eGGRT): No Information

Toxic Releases (TRI): No Information

Compliance and Emissions Data Reporting Interface (CEDRI): No Information

Go To Enforcement/Compliance Details

Known Data Problems <<https://epa.gov/resources/echo-data/known-data-problems>>

Facility/System Characteristics

Facility/System Characteristics

| System | Statute | Identifier | Universe | Status | Areas | Permit Expiration Date | Indian Country | Latitude | Longitude |
|----------|---------|--------------|----------|--------------|-------|------------------------|----------------|-----------|------------|
| FRS | | 110003844868 | | | | | N | 47.66751 | -96.00865 |
| RCRAInfo | RCRA | MND985694264 | Other | Inactive () | | | N | 47.667252 | -96.008871 |

Facility Address

| System | Statute | Identifier | Facility Name | Facility Address | Facility County |
|----------|---------|--------------|--------------------|---------------------------------|-----------------|
| FRS | | 110003844868 | MERLINS AUTO SALES | 104 ROSS AVE, ERSKINE, MN 56535 | Polk County |
| RCRAInfo | RCRA | MND985694264 | MERLINS AUTO SALES | 104 ROSS AVE, ERSKINE, MN 56535 | Polk County |

Facility SIC (Standard Industrial Classification) Codes

| System | Identifier | SIC Code | SIC Description |
|--------|------------|----------|-----------------|
|--------|------------|----------|-----------------|

No data records returned

Facility NAICS (North American Industry Classification System) Codes

| System | Identifier | NAICS Code | NAICS Description |
|--------|------------|------------|-------------------|
|--------|------------|------------|-------------------|

No data records returned

Facility Tribe Information

| Reservation Name | Tribe Name | EPA Tribal ID | Distance to Tribe (miles) |
|-------------------------|--|---------------|---------------------------|
| White Earth Reservation | Minnesota Chippewa Tribe, Minnesota (White Earth Band) | 100000576 | 12 |
| Red Lake Reservation | Red Lake Band of Chippewa Indians, Minnesota | 100000237 | 22 |

Enforcement and Compliance

Compliance Monitoring History

Last 5 Years

| Statute | Source ID | System | Activity Type | Compliance Monitoring Type | Lead Agency | Date | Finding (if applicable) |
|---------|-----------|--------|---------------|----------------------------|-------------|------|-------------------------|
|---------|-----------|--------|---------------|----------------------------|-------------|------|-------------------------|

No data records returned

Entries in italics are not included in ECHO's Compliance Monitoring Activity counts because they are not compliance monitoring strategy

<<https://www.epa.gov/compliance/compliance-monitoring-programs>> activities or because they are not counted as inspections within EPA's Annual Results

<<https://www.epa.gov/enforcement/enforcement-data-and-results>>.

Compliance Summary Data

| Statute | Source ID | Current SNC (Significant Noncompliance)/HPV (High Priority Violation) | Current As Of | Qtrs with NC (Noncompliance) (of 12) | Data Last Refreshed |
|---------|--------------|---|---------------|--------------------------------------|---------------------|
| RCRA | MND985694264 | No | 01/10/2026 | 0 | 01/09/2026 |

Three-Year Compliance History by Quarter

| Statute | Program/Pollutant/Violation Type | QTR 1 | QTR 2 | QTR 3 | QTR 4 | QTR 5 | QTR 6 | QTR 7 | QTR 8 | QTR 9 | QTR 10 | QTR 11 |
|---------|----------------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| RCRA | (Source ID: MND985694264) | 01/01-03/31/23 | 04/01-06/30/23 | 07/01-09/30/23 | 10/01-12/31/23 | 01/01-03/31/24 | 04/01-06/30/24 | 07/01-09/30/24 | 10/01-12/31/24 | 01/01-03/31/25 | 04/01-06/30/25 | 07/01-09/30/25 |
| | Facility-Level Status | No Violation Identified |
| | Violation | | | | | | | | | | | |
| | Agency | | | | | | | | | | | |

Informal Enforcement Actions

Last 5 Years

| Statute | System | Source ID | Type of Action | Lead Agency | Date |
|---------|--------|-----------|----------------|-------------|------|
|---------|--------|-----------|----------------|-------------|------|

No data records returned

Entries in italics are not counted as "informal enforcement actions" in EPA policies pertaining to enforcement response tools.

Formal Enforcement Actions

Last 5 Years

| Statute | System | Law/Section | Source ID | Type of Action | Case No. | Lead Agency | Case Name | Issued/Filed Date | Settlements/Actions | Settlement/Action Date | Federal Penalty Assessed | State/Local Penalty Assessed | Penalty Amount Collected | SEP Value | Comp Action Cost |
|---------|--------|-------------|-----------|----------------|----------|-------------|-----------|-------------------|---------------------|------------------------|--------------------------|------------------------------|--------------------------|-----------|------------------|
|---------|--------|-------------|-----------|----------------|----------|-------------|-----------|-------------------|---------------------|------------------------|--------------------------|------------------------------|--------------------------|-----------|------------------|

No data records returned

Environmental Conditions

Watersheds

| 12-Digit WBD (Watershed Boundary Dataset) HUC (RAD (Reach Address Database)) | WBD (Watershed Boundary Dataset) Subwatershed Name (RAD (Reach Address Database)) | State Water Body Name (ICIS (Integrated Compliance Information System)) | Beach Closures Within Last Year | Beach Closures Within Last Two Years | Pollutants Potentially Related to Impairment | Watershed with ESA (Endangered Species Act)-listed Aquatic Species? |
|--|---|---|---------------------------------|--------------------------------------|--|---|
|--|---|---|---------------------------------|--------------------------------------|--|---|

No data records returned

Assessed Waters From Latest State Submission (ATTAINS)

| State | Report Cycle | Assessment Unit ID | Assessment Unit Name | Water Condition | Cause Groups Impaired | Drinking Water Use | Ecological Use | Fish Consumption Use | Recreation Use | Other Use |
|-------|--------------|--------------------|----------------------|-----------------|-----------------------|--------------------|----------------|----------------------|----------------|-----------|
|-------|--------------|--------------------|----------------------|-----------------|-----------------------|--------------------|----------------|----------------------|----------------|-----------|

No data records returned

Air Quality Nonattainment Areas

| Pollutant | Within Nonattainment Status Area? | Nonattainment Status Applicable Standard(s) | Within Maintenance Status Area? | Maintenance Status Applicable Standard(s) |
|-----------|-----------------------------------|---|---------------------------------|---|
|-----------|-----------------------------------|---|---------------------------------|---|

No data records returned

Pollutants

Toxics Release Inventory History of Reported Chemicals Released or Transferred in Pounds per Year at Site

| TRI Facility ID | Year | Air Emissions | Surface Water Discharges | Off-Site Transfers to POTWs (Publicly Owned Treatment Works) | Underground Injections | Disposal to Land | Total On-Site Releases | Total Off-Site Transfers |
|-----------------|------|---------------|--------------------------|--|------------------------|------------------|------------------------|--------------------------|
|-----------------|------|---------------|--------------------------|--|------------------------|------------------|------------------------|--------------------------|

No data records returned

Toxics Release Inventory Total Releases and Transfers in Pounds by Chemical and Year

| Chemical Name |
|---------------|
|---------------|

No data records returned

Community

Demographic Profile of Surrounding Area (1-Mile Radius)

This section provides demographic information regarding the community surrounding the facility. ECHO compliance data alone are not sufficient to determine whether violations at a particular facility had negative impacts on public health or the environment. Statistics are based upon the 2023 American Community Survey (ACS) 5-year Summary and are accurate to the extent that the facility latitude and longitude listed below are correct. Census boundaries and demographic data for U.S. Territories are based on the "2020 Island Areas Demographic Profiles" from the U.S. Census Bureau. EPA's spatial processing methodology considers the overlap between the selected radii and ACS census block groups in determining the demographics surrounding the facility. For more detail about this methodology, see the DFR Data Dictionary <<https://epa.gov/help/reports/dfr-data-dictionary#demographic>>.

| General Statistics (ACS (American Community Survey)) | |
|--|-----------|
| Total Persons | 62 |
| Population Density | 21/sq.mi. |
| Housing Units in Area | 31 |
| Percent People of Color | 8% |
| Households in Area | 25 |
| Households on Public Assistance | 3 |
| Persons With Low Income | 22 |
| Percent With Low Income | 35% |

| Geography | |
|-------------------------|-------------|
| Radius of Selected Area | 1 mi. |
| Center Latitude | 47.66751 |
| Center Longitude | -96.00865 |
| Total Area | 3.14 sq.mi. |
| Land Area | 94% |
| Water Area | 6% |

| Income Breakdown (ACS (American Community Survey)) - Households (%) | |
|---|---------|
| Less than \$15,000 | 3 (12%) |
| \$15,000 - \$25,000 | 5 (20%) |
| \$25,000 - \$50,000 | 5 (20%) |
| \$50,000 - \$75,000 | 4 (16%) |

| Age Breakdown (ACS (American Community Survey)) - Persons (%) | |
|---|----------|
| Children 5 years and younger | 6 (10%) |
| Minors 17 years and younger | 17 (27%) |
| Adults 18 years and older | 45 (73%) |
| Seniors 65 years and older | 11 (18%) |

| Race Breakdown (ACS (American Community Survey)) - Persons (%) | |
|--|----------|
| White | 58 (94%) |
| African-American | 0 (0%) |
| Hispanic-Origin | 2 (3%) |
| Asian | 1 (2%) |
| Hawaiian/Pacific Islander | 0 (0%) |
| American Indian | 0 (0%) |
| Other/Multiracial | 1 (2%) |

| Education Level (Persons 25 & older) (ACS (American Community Survey)) - Persons (%) | |
|--|-----------|
| Less than 9th Grade | 1 (2.5%) |
| 9th through 12th Grade | 3 (7.5%) |
| High School Diploma | 16 (40%) |
| Some College/2-year | 7 (17.5%) |
| B.S./B.A. (Bachelor of Science/Bachelor of Arts) or More | 4 (10%) |

Income Breakdown (ACS (American Community Survey)) - Households (%)

| | |
|-----------------------|---------|
| Greater than \$75,000 | 8 (32%) |
|-----------------------|---------|



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-1000

This Worksheet was designed to be used by those “Partners” (including Public Housing Authorities, consultants, contractors, and nonprofits) who assist Responsible Entities and HUD in preparing environmental reviews, but legally cannot take full responsibilities for these reviews themselves. Responsible Entities and HUD should use the RE/HUD version of the Worksheet.

Endangered Species Act (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/endangered-species>

1. Does the project involve any activities that have the potential to affect species or habitats?

- No, the project will have No Effect due to the nature of the activities involved in the project.
→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.
- No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office.
Explain your determination:
Click here to enter text.
→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.
- Yes, the activities involved in the project have the potential to affect species and/or habitats.
→ Continue to Question 2.

2. Are federally listed species or designated critical habitats present in the action area?

Obtain a list of protected species from the Services. This information is available on the [FWS Website](#).

- No, the project will have No Effect due to the absence of federally listed species and designated critical habitat.
→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination. Documentation may include letters from the Services, species lists from the Services’ websites, surveys or other documents and analysis showing that there are no species in the action area.
- Yes, there are federally listed species or designated critical habitats present in the action area. → Continue to Question 3.

3. Recommend one of the following effects that the project will have on federally listed species or designated critical habitat:

No Effect: Based on the specifics of both the project and any federally listed species in the action area, you have determined that the project will have absolutely no effect on listed species or critical habitat.

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination. Documentation should include a species list and explanation of your conclusion, and may require maps, photographs, and surveys as appropriate.*

May Affect, Not Likely to Adversely Affect: Any effects that the project may have on federally listed species or critical habitats would be beneficial, discountable, or insignificant.

→ Partner entities should not contact the Services directly. *If the RE/HUD agrees with this recommendation, they will have to complete Informal Consultation. Provide the RE/HUD with a biological evaluation or equivalent document. They may request additional information, including surveys and professional analysis, to complete their consultation.*

Likely to Adversely Affect: The project may have negative effects on one or more listed species or critical habitat.

→ Partner entities should not contact the Services directly. *If the RE/HUD agrees with this recommendation, they will have to complete Formal Consultation. Provide the RE/HUD with a biological evaluation or equivalent document. They may request additional information, including surveys and professional analysis, to complete their consultation.*

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

The IPaC identified four species that have the potential to be in the project area; gray wolf (threatened), the monarch butterfly (proposed threatened), Suckley's cuckoo bumble bee (proposed endangered), and the western prairie fringed orchid (threatened). The IPaC also listed the potential for several migratory birds to be present: the bald eagle, bobolink, chimney swift, franklin's gull, le conte's sparrow, northern harrier, and the western grebe. Construction is anticipated to occur in previously disturbed areas. The project will have no effect on the federally listed species due to the nature of the construction. There are no designated critical habitat areas, refuge lands, or fish hatcheries within the vicinity of the project.



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Minnesota-Wisconsin Ecological Services Field Office
3815 American Blvd East
Bloomington, MN 55425-1659
Phone: (952) 858-0793

In Reply Refer To:

01/13/2026 16:41:27 UTC

Project Code: 2026-0035661

Project Name: City Of Erskine Utility Improvement Project

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

This response has been generated by the Information, Planning, and Conservation (IPaC) system to provide information on natural resources that could be affected by your project. The U.S. Fish and Wildlife Service (Service) provides this response under the authority of the Endangered Species Act of 1973 (16 U.S.C. 1531-1543), the Bald and Golden Eagle Protection Act (16 U.S.C. 668-668d), the Migratory Bird Treaty Act (16 U.S.C. 703-712), and the Fish and Wildlife Coordination Act (16 U.S.C. 661 *et seq.*).

Threatened and Endangered Species

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and may be affected by your proposed project. The species list fulfills the requirement for obtaining a Technical Assistance Letter from the U.S. Fish and Wildlife Service under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

Consultation Technical Assistance

Please refer to our [Section 7 website](#) for guidance and technical assistance, including [step-by-step instructions](#) for making effects determinations for each species that might be present and for specific guidance on the following types of projects: projects in developed areas, HUD, CDBG, EDA, USDA Rural Development projects, pipelines, buried utilities, telecommunications, and requests for a Conditional Letter of Map Revision (CLOMR) from FEMA.

We recommend running the project (if it qualifies) through our **Minnesota-Wisconsin Federal Endangered Species Determination Key (Minnesota-Wisconsin ("D-key"))**. A [demonstration video](#) showing how-to access and use the determination key is available. Please note that the Minnesota-Wisconsin D-key is the third option of 3 available d-keys. D-keys are tools to help Federal agencies and other project proponents determine if their proposed action has the potential to adversely affect federally listed species and designated critical habitat. The Minnesota-Wisconsin D-key includes a structured set of questions that assists a project proponent in determining whether a proposed project qualifies for a certain predetermined consultation outcome for all federally listed species found in Minnesota and Wisconsin (except for the northern long-eared bat- see below), which includes determinations of “no effect” or “may affect, not likely to adversely affect.” In each case, the Service has compiled and analyzed the best available information on the species’ biology and the impacts of certain activities to support these determinations.

If your completed d-key output letter shows a "No Effect" (NE) determination for all listed species, print your IPaC output letter for your files to document your compliance with the Endangered Species Act.

For Federal projects with a “Not Likely to Adversely Affect” (NLAA) determination, our concurrence becomes valid if you do not hear otherwise from us after a 30-day review period, as indicated in your letter.

If your d-key output letter indicates additional coordination with the Minnesota-Wisconsin Ecological Services Field Office is necessary (i.e., you get a “May Affect” determination), you will be provided additional guidance on contacting the Service to continue ESA coordination outside of the key; ESA compliance cannot be concluded using the key for “May Affect” determinations unless otherwise indicated in your output letter.

Note: Once you obtain your official species list, you are not required to continue in IPaC with d-keys, although in most cases these tools should expedite your review. If you choose to make an effects determination on your own, you may do so. If the project is a Federal Action, you may want to review our section 7 step-by-step instructions before making your determinations.

Using the IPaC Official Species List to Make No Effect and May Affect Determinations for Listed Species

1. If IPaC returns a result of “There are no listed species found within the vicinity of the project,” then project proponents can conclude the proposed activities will have **no effect** on any federally listed species under Service jurisdiction. Concurrence from the Service is not required for **no effect** determinations. No further consultation or coordination is required. Attach this letter to the dated IPaC species list report for your records.
2. If IPaC returns one or more federally listed, proposed, or candidate species as potentially present in the action area of the proposed project – other than bats (see below) – then project proponents must determine if proposed activities will have **no effect** on or **may affect** those species. For assistance in determining if suitable habitat for listed, candidate, or proposed species occurs within your project area or if species may be affected by project activities, you can obtain [Life History Information for Listed and Candidate Species](#) on our office website. If no impacts will occur to a species on the IPaC species list (e.g., there is no habitat present in the project area), the appropriate determination is **no effect**. No further consultation or coordination is required. Attach this letter to the dated IPaC species list report for your records.

3. Should you determine that project activities **may affect** any federally listed, please contact our office for further coordination. Letters with requests for consultation or correspondence about your project should include the Consultation Tracking Number in the header. [Electronic submission is preferred.](#)

Northern Long-Eared Bats

Northern long-eared bats occur throughout Minnesota and Wisconsin and the information below may help in determining if your project may affect these species.

Suitable summer habitat for northern long-eared bats consists of a wide variety of forested/wooded habitats where they roost, forage, and travel and may also include some adjacent and interspersed non-forested habitats such as emergent wetlands and adjacent edges of agricultural fields, old fields and pastures. This includes forests and woodlots containing potential roosts (i.e., live trees and/or snags ≥ 3 inches dbh for northern long-eared bat that have exfoliating bark, cracks, crevices, and/or hollows), as well as linear features such as fencerows, riparian forests, and other wooded corridors. These wooded areas may be dense or loose aggregates of trees with variable amounts of canopy closure. Individual trees may be considered suitable habitat when they exhibit the characteristics of a potential roost tree and are located within 1,000 feet (305 meters) of forested/wooded habitat. Northern long-eared bats have also been observed roosting in human-made structures, such as buildings, barns, bridges, and bat houses; therefore, these structures should also be considered potential summer habitat and evaluated for use by bats. If your project will impact caves or mines or will involve clearing forest or woodland habitat containing suitable roosting habitat, northern long-eared bats could be affected. For bat activity dates, please review Appendix L in the [Range-wide Indiana Bat and Northern Long-Eared Bat Survey Guidelines](#).

Examples of unsuitable habitat include:

- Individual trees that are greater than 1,000 feet from forested or wooded areas,
- Trees found in highly developed urban areas (e.g., street trees, downtown areas),
- A pure stand of less than 3-inch dbh trees that are not mixed with larger trees, and
- A monoculture stand of shrubby vegetation with no potential roost trees.

If IPaC returns a result that northern long-eared bats are potentially present in the action area of the proposed project, project proponents can conclude the proposed activities **may affect** this species **IF** one or more of the following activities are proposed:

- Clearing or disturbing suitable roosting habitat, as defined above, at any time of year,
- Any activity in or near the entrance to a cave or mine,
- Mining, deep excavation, or underground work within 0.25 miles of a cave or mine,
- Construction of one or more wind turbines, or
- Demolition or reconstruction of human-made structures that are known to be used by bats based on observations of roosting bats, bats emerging at dusk, or guano deposits or stains.

If none of the above activities are proposed, project proponents can conclude the proposed activities will have **no effect** on the northern long-eared bat. Concurrence from the Service is not required for **No Effect** determinations. No further consultation or coordination is required. Attach this letter to the dated IPaC

species list report for your records.

If any of the above activities are proposed, and the northern long-eared bat appears on the user's species list, the federal project user will be directed to either the northern long-eared bat and tricolored bat range-wide D-key or the Federal Highways Administration, Federal Railways Administration, and Federal Transit Administration Indiana bat/Northern long-eared bat D-key, depending on the type of project and federal agency involvement. Similar to the Minnesota-Wisconsin D-key, these d-keys help to determine if prohibited take might occur and, if not, will generate an automated verification letter. Additional information about available tools can be found on the Service's [northern long-eared bat website](#).

Whooping Crane

Whooping crane is designated as a non-essential experimental population in Wisconsin and consultation under Section 7(a)(2) of the Endangered Species Act is only required if project activities will occur within a National Wildlife Refuge or National Park. If project activities are proposed on lands outside of a National Wildlife Refuge or National Park, then you are not required to consult. For additional information on this designation and consultation requirements, please review "[Establishment of a Nonessential Experimental Population of Whooping Cranes in the Eastern United States](#)."

Other Trust Resources and Activities

Bald and Golden Eagles - Although the bald eagle has been removed from the endangered species list, this species and the golden eagle are protected by the Bald and Golden Eagle Act and the Migratory Bird Treaty Act. It is the responsibility of the project proponent to survey the area for any migratory bird nests. If there is an eagle nest on-site while work is on-going, eagles may be disturbed. We recommend avoiding and minimizing disturbance to eagles whenever practicable. If you cannot avoid eagle disturbance, you may seek a [permit](#). A [nest take permit](#) is always required for removal, relocation, or obstruction of an eagle nest. For communication and wind energy projects, please refer to additional guidelines below.

Migratory Birds - The Migratory Bird Treaty Act (MBTA) prohibits the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests, except when specifically authorized by the Service. The Service has the responsibility under the MBTA to proactively prevent the mortality of migratory birds whenever possible and we encourage implementation of [recommendations that minimize potential impacts to migratory birds](#). Such measures include clearing forested habitat outside the nesting season (generally March 1 to August 31) or conducting nest surveys prior to clearing to avoid injury to eggs or nestlings.

Communication Towers - Construction of new communications towers (including radio, television, cellular, and microwave) creates a potentially significant impact on migratory birds, especially some 350 species of night-migrating birds. However, the Service has developed [voluntary guidelines for minimizing impacts](#).

Transmission Lines - Migratory birds, especially large species with long wingspans, heavy bodies, and poor maneuverability can also collide with power lines. In addition, mortality can occur when birds, particularly hawks, eagles, kites, falcons, and owls, attempt to perch on uninsulated or unguarded power poles. To minimize these risks, please refer to [guidelines](#) developed by the Avian Power Line Interaction Committee and the Service. Implementation of these measures is especially important along sections of lines adjacent to wetlands or other areas that support large numbers of raptors and migratory birds.

Wind Energy - To minimize impacts to migratory birds and bats, wind energy projects should follow the Service's [Wind Energy Guidelines](#). In addition, please refer to the Service's [Eagle Conservation Plan Guidance](#), which provides guidance for conserving bald and golden eagles in the course of siting, constructing, and operating wind energy facilities.

State Department of Natural Resources Coordination

While it is not required for your Federal section 7 consultation, please note that additional state endangered or threatened species may also have the potential to be impacted. **Please contact the Minnesota or Wisconsin Department of Natural Resources for information on state listed species that may be present in your proposed project area.**

Minnesota

[Minnesota Department of Natural Resources - Endangered Resources Review Homepage](#)

Email: Review.NHIS@state.mn.us

Wisconsin

[Wisconsin Department of Natural Resources - Endangered Resources Review Homepage](#)

Email: DNRRERReview@wi.gov

We appreciate your concern for threatened and endangered species. Please feel free to contact our office with questions or for additional information.

Attachment(s):

- Official Species List
- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Minnesota-Wisconsin Ecological Services Field Office

3815 American Blvd East

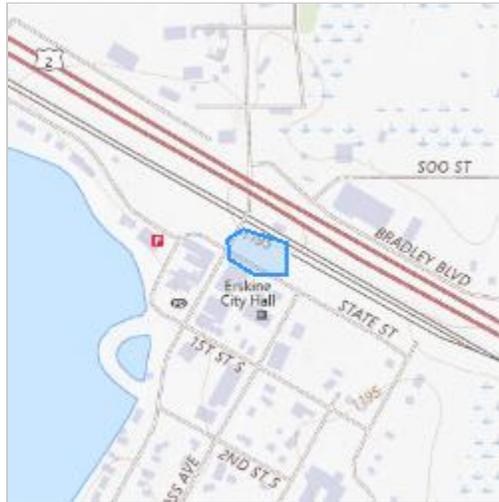
Bloomington, MN 55425-1659

(952) 858-0793

PROJECT SUMMARY

Project Code: 2026-0035661
Project Name: City Of Erskine Utility Improvement Project
Project Type: Water Supply Facility - Maintenance / Modification
Project Description: City of Erskine, water tower repairs this year.
Project Location:

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@47.668269,-96.00918044610488,14z>



Counties: Polk County, Minnesota

ENDANGERED SPECIES ACT SPECIES

There is a total of 4 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

| NAME | STATUS |
|---|------------|
| Gray Wolf <i>Canis lupus</i> Population: MN There is final critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/4488 | Threatened |

INSECTS

| NAME | STATUS |
|---|------------------------|
| Monarch Butterfly <i>Danaus plexippus</i> There is proposed critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743 | Proposed Threatened |
| Suckley's Cuckoo Bumble Bee <i>Bombus suckleyi</i> Population: No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/10885 | Proposed Endangered |

FLOWERING PLANTS

| NAME | STATUS |
|--|------------|
| Western Prairie Fringed Orchid <i>Platanthera praeclara</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1669 | Threatened |

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

BALD & GOLDEN EAGLES

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act ² and the Migratory Bird Treaty Act (MBTA) ¹. Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their habitats, should follow appropriate regulations and consider implementing appropriate avoidance and minimization measures, as described in the various links on this page.

1. The [Bald and Golden Eagle Protection Act](#) of 1940.
2. The [Migratory Birds Treaty Act](#) of 1918.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

There are Bald Eagles and/or Golden Eagles in your [project](#) area.

Measures for Proactively Minimizing Eagle Impacts

For information on how to best avoid and minimize disturbance to nesting bald eagles, please review the [National Bald Eagle Management Guidelines](#). You may employ the timing and activity-specific distance recommendations in this document when designing your project/activity to avoid and minimize eagle impacts. For bald eagle information specific to Alaska, please refer to [Bald Eagle Nesting and Sensitivity to Human Activity](#).

The FWS does not currently have guidelines for avoiding and minimizing disturbance to nesting Golden Eagles. For site-specific recommendations regarding nesting Golden Eagles, please consult with the appropriate Regional [Migratory Bird Office](#) or [Ecological Services Field Office](#).

If disturbance or take of eagles cannot be avoided, an [incidental take permit](#) may be available to authorize any take that results from, but is not the purpose of, an otherwise lawful activity. For assistance making this determination for Bald Eagles, visit the [Do I Need A Permit Tool](#). For assistance making this determination for golden eagles, please consult with the appropriate Regional [Migratory Bird Office](#) or [Ecological Services Field Office](#).

Ensure Your Eagle List is Accurate and Complete

If your project area is in a poorly surveyed area in IPaC, your list may not be complete and you may need to rely on other resources to determine what species may be present (e.g. your local FWS field office, state surveys, your own surveys). Please review the [Supplemental Information on Migratory Birds and Eagles](#), to help you properly interpret the report for your specified location, including determining if there is sufficient data to ensure your list is accurate.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to bald or golden eagles on your list, see the "Probability of Presence Summary" below to see when these bald or golden eagles are most likely to be present and breeding in your project area.

| NAME | BREEDING SEASON |
|---|------------------------|
| Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626 | Breeds Dec 1 to Aug 31 |

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "[Supplemental Information on Migratory Birds and Eagles](#)", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)

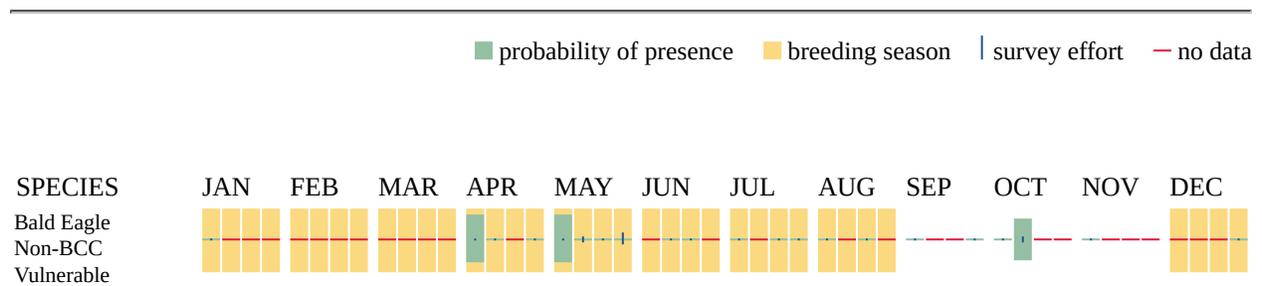
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)

Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (—)

A week is marked as having no data if there were no survey events for that week.



Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>

- Nationwide avoidance and minimization measures for birds <https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf>
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

MIGRATORY BIRDS

The Migratory Bird Treaty Act (MBTA) ¹ prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service (Service).

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the "Probability of Presence Summary" below to see when these birds are most likely to be present and breeding in your project area.

| NAME | BREEDING SEASON |
|--|-------------------------|
| Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626 | Breeds Dec 1 to Aug 31 |
| Bobolink <i>Dolichonyx oryzivorus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9454 | Breeds May 20 to Jul 31 |
| Chimney Swift <i>Chaetura pelagica</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9406 | Breeds Mar 15 to Aug 25 |
| Franklin's Gull <i>Leucophaeus pipixcan</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/10567 | Breeds May 1 to Jul 31 |

| NAME | BREEDING SEASON |
|---|------------------------|
| Le Conte's Sparrow <i>Ammospiza leconteii</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9469 | Breeds Jun 1 to Aug 15 |
| Northern Harrier <i>Circus hudsonius</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/8350 | Breeds Apr 1 to Sep 15 |
| Western Grebe <i>aechmophorus occidentalis</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/6743 | Breeds Jun 1 to Aug 31 |

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "[Supplemental Information on Migratory Birds and Eagles](#)", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season (■)

Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)

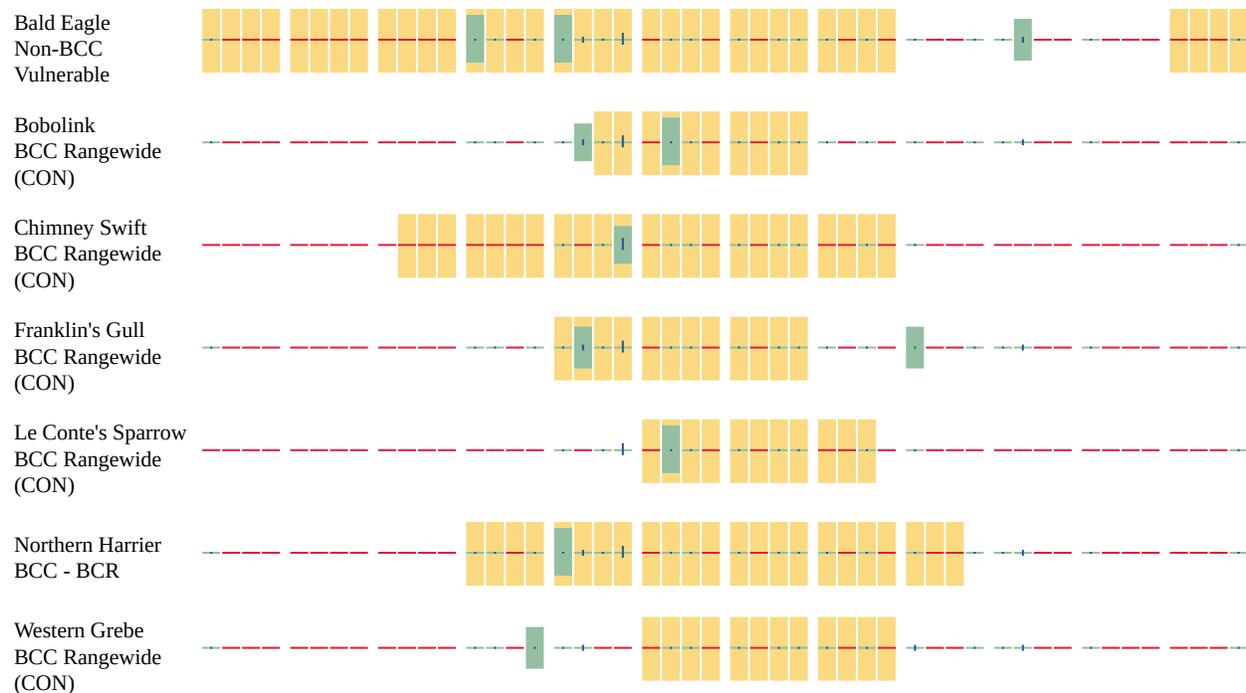
Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (—)

A week is marked as having no data if there were no survey events for that week.

■ probability of presence ■ breeding season | survey effort — no data

SPECIES JAN FEB MAR APR MAY JUN JUL AUG SEP OCT NOV DEC



Additional information can be found using the following links:

- Eagle Management <https://www.fws.gov/program/eagle-management>
- Measures for avoiding and minimizing impacts to birds <https://www.fws.gov/library/collections/avoiding-and-minimizing-incident-take-migratory-birds>
- Nationwide avoidance and minimization measures for birds
- Supplemental Information for Migratory Birds and Eagles in IPaC <https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action>

WETLANDS

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.

IPAC USER CONTACT INFORMATION

Agency: Erskine city
Name: Amelia Rankin
Address: 3315 Roosevelt Rd.
Address Line 2: Suite 300
City: St. Cloud
State: MN
Zip: 56301
Email: amelia.rankin@mooreengineeringinc.com
Phone: 4402314389



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Minnesota-Wisconsin Ecological Services Field Office
3815 American Blvd East
Bloomington, MN 55425-1659
Phone: (952) 858-0793

In Reply Refer To:

01/13/2026 17:08:16 UTC

Project code: 2026-0035661

Project Name: City Of Erskine Utility Improvement Project

Subject: Technical Assistance letter for 'City Of Erskine Utility Improvement Project' for specified threatened and endangered species that may occur in your proposed project location consistent with the Minnesota-Wisconsin Endangered Species Determination Key (Minnesota-Wisconsin DKey).

Dear Amelia Rankin:

The U.S. Fish and Wildlife Service (Service) received on **January 13, 2026** your effect determination(s) for the 'City Of Erskine Utility Improvement Project' (Action) using the Minnesota-Wisconsin DKey within the Service's Information for Planning and Consultation (IPaC) system. The Service developed this system in accordance with the Endangered Species Act of 1973 (ESA) (87 Stat. 884, as amended; 16 U.S.C 1531 et seq.).

Based on your responses to the Service's Minnesota-Wisconsin DKey, you made the following effect determination(s) for the proposed Action:

| Species | Listing Status | Determination |
|---|-----------------------|----------------------|
| Gray Wolf (<i>Canis lupus</i>) | Threatened | No effect |
| Monarch Butterfly (<i>Danaus plexippus</i>) | Proposed | No effect |
| | Threatened | |
| Western Prairie Fringed Orchid (<i>Platanthera praeclara</i>) | Threatened | No effect |

Determination Information

Thank you for informing the Service of your "No Effect" determination(s). No further coordination is necessary for the species you determined will not be affected by the Action.

Additional Information

Sufficient project details: Please provide sufficient project details on your project homepage in IPaC (Define Project, Project Description) to support your conclusions. Failure to disclose important aspects of your project that would influence the outcome of your effects determinations may negate your determinations and invalidate this letter. If you have site-specific information that leads you to believe a different determination is more appropriate for your

project than what the Dkey concludes, you can and should proceed based on the best available information.

Future project changes: The Service recommends that you contact the Minnesota-Wisconsin Ecological Services Field Office or re-evaluate the project in IPaC if: 1) the scope or location of the proposed Action is changed; 2) new information reveals that the action may affect federally listed species or federally designated critical habitat in a manner or to an extent not previously considered; 3) the Action is modified in a manner that causes effects to listed species or designated critical habitat; or 4) a new species is listed or critical habitat designated. If any of the above conditions occurs, additional consultation with the Service should take place before project changes are final or resources committed.

Species-specific information

Listed Plants: You have indicated that your Action has no effect (NE) on a threatened or endangered plant species, without a Federal nexus of any kind (i.e., the project is not on Federal land; no Federal funding, authorization, or permitting required; no Federal agency involvement in planning or implementation). Although your Endangered Species Act requirements are met, we recommend you contact the Minnesota or Wisconsin Department of Natural Resources regarding compliance with state law. **You may need a state permit if your Action will harm state listed plants. We encourage landowners to maintain habitat for listed plant species and avoid disturbing listed plants to the extent possible.**

Bald and Golden Eagles: Bald eagles, golden eagles, and their nests are protected under the Bald and Golden Eagle Protection Act (54 Stat. 250, as amended, 16 U.S.C. 668a-d) (Eagle Act). The Eagle Act prohibits, except when authorized by an Eagle Act permit, the “taking” of bald and golden eagles and defines “take” as “pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb.” The Eagle Act’s implementing regulations define disturb as “... to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, (1) injury to an eagle, (2) a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior, or (3) nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering behavior.”

If you observe a bald eagle nest in the vicinity of your proposed project, you should follow the [National Bald Eagle Management Guidelines \(May 2007\)](#). For more information on eagles and conducting activities in the vicinity of an eagle nest, please visit our [regional eagle website](#) or contact Margaret at Margaret.Martin@fws.gov. If the Action may affect bald or golden eagles, additional coordination with the Service under the Eagle Act may be required.

Additional Species Requiring Review

In addition to the species described above, the following species or critical habitats may also occur in your project area and are not covered by this conclusion:

- Suckley's Cuckoo Bumble Bee *Bombus suckleyi* Proposed Endangered

Coordination with the Service is not complete if additional coordination is advised above for any species.

Action Description

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

1. Name

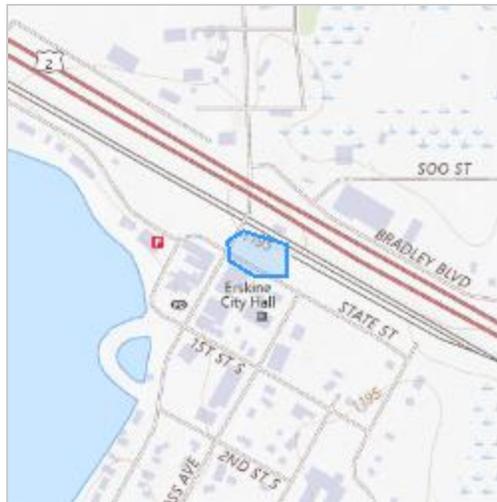
City Of Erskine Utility Improvement Project

2. Description

The following description was provided for the project 'City Of Erskine Utility Improvement Project':

City of Erskine, water tower repairs this year.

The approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@47.668269,-96.00918044610488,14z>



QUALIFICATION INTERVIEW

1. This determination key is intended to assist the user in evaluating the effects of their actions on Federally listed species in Minnesota and Wisconsin. It does not cover other prohibited activities under the Endangered Species Act (e.g., for wildlife: import/export, Interstate or foreign commerce, possession of illegally taken wildlife, etc.; for plants: import/export, reduce to possession, malicious destruction on Federal lands, commercial sale, etc.) or other statutes. Additionally, this key DOES NOT cover wind development, purposeful take (e.g., for research or surveys), communication towers that have guy wires or are over 450 feet in height, aerial or other large-scale application of any chemical (such as insecticide or herbicide), and approval of long-term permits or plans (e.g., FERC licenses, HCP's).

Click **YES** to acknowledge that you must consider other prohibitions of the ESA or other statutes outside of this determination key.

Yes

2. Is the action being funded, authorized, or carried out by a Federal agency?

No

3. Is the action being conducted by or on behalf of a Federally recognized Tribe?

No

4. Does the action involve the installation or operation of wind turbines?

No

5. Does the action involve purposeful take of a listed animal?

No

6. Does the action involve a new communications tower?

No

7. Does the activity involve aerial or other large-scale application of ANY chemical, including pesticides (insecticide, herbicide, fungicide, rodenticide, etc.)?

No

8. Will your action permanently affect local hydrology?

No

9. Will your action temporarily affect local hydrology?

No

10. Will your project have any direct impacts to a stream or river (e.g., Horizontal Directional Drilling (HDD), hydrostatic testing, stream/road crossings, new stormwater outfall discharge, dams, other in-stream work, etc.)?

No

11. Does your project have the potential to impact the riparian zone or indirectly impact a stream/river (e.g., cut and fill; horizontal directional drilling; construction; vegetation removal; pesticide or fertilizer application; discharge; runoff of sediment or pollutants; increase in erosion, etc.)?

Note: Consider all potential effects of the action, including those that may happen later in time and outside and downstream of the immediate area involved in the action.

Endangered Species Act regulation defines "effects of the action" to include all consequences to listed species or critical habitat that are caused by the proposed action, including the consequences of other activities that are caused by the proposed action. A consequence is caused by the proposed action if it would not occur but for the proposed action and it is reasonably certain to occur. Effects of the action may occur later in time and may include consequences occurring outside the immediate area involved in the action. (50 CFR 402.02).

No

12. Will your action disturb the ground or existing vegetation?

Note: This includes any off-road vehicle access, soil compaction (enough to collapse a rodent burrow), digging, seismic survey, directional drilling, heavy equipment, grading, trenching, placement of fill, pesticide application (herbicide, fungicide), vegetation management (including removal or maintenance using equipment or prescribed fire), cultivation, development, etc.

No

13. Will your action include spraying insecticides?

No

14. Does your action area occur entirely within an already developed area?

Note: Already developed areas are already paved, covered by existing structures, manicured lawns, industrial sites, or cultivated cropland, AND do not contain trees that could be roosting habitat. Be aware that listed species may occur in areas with natural, or semi-natural, vegetation immediately adjacent to existing utilities (e.g. roadways, railways) or within utility rights-of-way such as overhead transmission line corridors, and can utilize suitable trees, bridges, or culverts for roosting even in urban dominated landscapes (so these are not considered "already developed areas" for the purposes of this question). If unsure, select NO..

Yes

15. Does the action have potential indirect effects to listed species or the habitats they depend on (e.g., water discharge into adjacent habitat or waterbody, changes in groundwater elevation, introduction of an exotic plant species)?

No

16. [Hidden Semantic] Does the action area intersect the Threatened gray wolf AOI?

Automatically answered

Yes

17. [Hidden Semantic] Does the action area intersect the monarch butterfly species list area?

Automatically answered

Yes

IPAC USER CONTACT INFORMATION

Agency: Erskine city
Name: Amelia Rankin
Address: 3315 Roosevelt Rd.
Address Line 2: Suite 300
City: St. Cloud
State: MN
Zip: 56301
Email: amelia.rankin@mooreengineeringinc.com
Phone: 4402314389



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-1000

This Worksheet was designed to be used by those “Partners” (including Public Housing Authorities, consultants, contractors, and nonprofits) who assist Responsible Entities and HUD in preparing environmental reviews, but legally cannot take full responsibilities for these reviews themselves. Responsible Entities and HUD should use the RE/HUD version of the Worksheet.

Explosive and Flammable Hazards (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/explosive-and-flammable-facilities>

1. Does the proposed HUD-assisted project include a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?

No

→ Continue to Question 2.

Yes

Explain:

Click here to enter text.

→ Continue to Question 5.

2. Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?

No → If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.

Yes → Continue to Question 3.

3. Within 1 mile of the project site, are there any current *or* planned stationary aboveground storage containers:

- Of more than 100-gallon capacity, containing common liquid industrial fuels OR
- Of any capacity, containing hazardous liquids or gases that are not common liquid industrial fuels?

No → If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide all documents used to make your determination.

Yes → Continue to Question 4.

4. Is the Separation Distance from the project acceptable based on standards in the Regulation?

Please visit HUD’s website for information on calculating Acceptable Separation Distance.

Yes

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.

Provide map(s) showing the location of the project site relative to any tanks and your separation distance calculations. If the map identifies more than one tank, please identify the tank you have chosen as the “assessed tank.”

No

→ Continue to Question 6.

Provide map(s) showing the location of the project site relative to any tanks and your separation distance calculations. If the map identifies more than one tank, please identify the tank you have chosen as the “assessed tank.”

5. Is the hazardous facility located at an acceptable separation distance from residences and any other facility or area where people may congregate or be present?

Please visit HUD’s website for information on calculating Acceptable Separation Distance.

Yes

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.

Provide map(s) showing the location of the project site relative to residences and any other facility or area where people congregate or are present and your separation distance calculations.

No

→ Continue to Question 6.

Provide map(s) showing the location of the project site relative to residences and any other facility or area where people congregate or are present and your separation distance calculations.

6. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to make the Separation Distance acceptable, including the timeline for implementation. If negative effects cannot be mitigated, cancel the project at this location.

Note that only licensed professional engineers should design and implement blast barriers. If a barrier will be used or the project will be modified to compensate for an unacceptable separation distance, provide approval from a licensed professional engineer.

[Click here to enter text.](#)

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

It is unlikely the project will be working near hazardous operations handling conventional fuels or chemicals of an explosive or flammable nature. The EPA NEPAAssist website identified areas near the project area that contain generators. All work will occur within existing public rights-of-way and previously disturbed areas, reducing the potential for encountering unknown fuel storage systems or flammable materials. Standard construction safety practices and applicable state and federal regulations

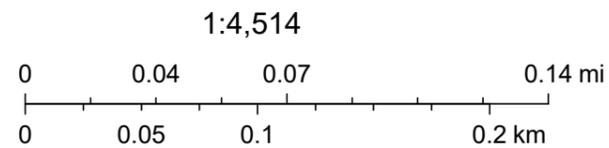
will be followed to minimize any risk related to fuel handling during construction activities. The project is not expected to pose or encounter any explosive or flammable hazards.

MPCA Sites



1/12/2026, 1:40:15 PM

- program
- Solid Waste
 - Stormwater
 - ▲ Tanks
 - ▲ Water Quality
 - Multiple Programs
 - Hazardous Waste
 - Investigation and Cleanup



MPCA, Source: Esri, USDA FSA, Source: Esri, Vantor, Earthstar Geographics, and the GIS User Community, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-1000

This Worksheet was designed to be used by those “Partners” (including Public Housing Authorities, consultants, contractors, and nonprofits) who assist Responsible Entities and HUD in preparing environmental reviews, but legally cannot take full responsibilities for these reviews themselves. Responsible Entities and HUD should use the RE/HUD version of the Worksheet.

Farmlands Protection (CEST and EA) - PARTNER

<https://www.hudexchange.info/environmental-review/farmlands-protection>

1. Does your project include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use?

Yes → *Continue to Question 2.*

No

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.*

2. Does “important farmland,” including prime farmland, unique farmland, or farmland of statewide or local importance regulated under the Farmland Protection Policy Act, occur on the project site?

You may use the links below to determine important farmland occurs on the project site:

- Utilize USDA Natural Resources Conservation Service’s (NRCS) Web Soil Survey <http://websoilsurvey.nrcs.usda.gov/app/HomePage.htm>
- Check with your city or county’s planning department and ask them to document if the project is on land regulated by the FPPA (zoning important farmland as non-agricultural does not exempt it from FPPA requirements)
- Contact NRCS at the local USDA service center <http://offices.sc.egov.usda.gov/locator/app?agency=nrcs> or your NRCS state soil scientist http://soils.usda.gov/contact/state_offices/ for assistance

No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide any documents used to make your determination.*

Yes → *Continue to Question 3.*

3. Consider alternatives to completing the project on important farmland and means of avoiding impacts to important farmland.

- Complete form [AD-1006, “Farmland Conversion Impact Rating”](#) and contact the state soil scientist before sending it to the local NRCS District Conservationist.
- Work with NRCS to minimize the impact of the project on the protected farmland. When you have finished with your analysis, return a copy of form AD-1006 to the USDA-NRCS State Soil Scientist or his/her designee informing them of your determination.

Work with the RE/HUD to determine how the project will proceed. Document the conclusion:

Project will proceed with mitigation.

Explain in detail the proposed measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

Click here to enter text.

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide form AD-1006 and all other documents used to make your determination.*

Project will proceed without mitigation.

Explain why mitigation will not be made here:

Click here to enter text.

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide form AD-1006 and all other documents used to make your determination.*

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

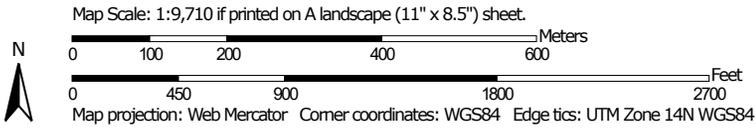
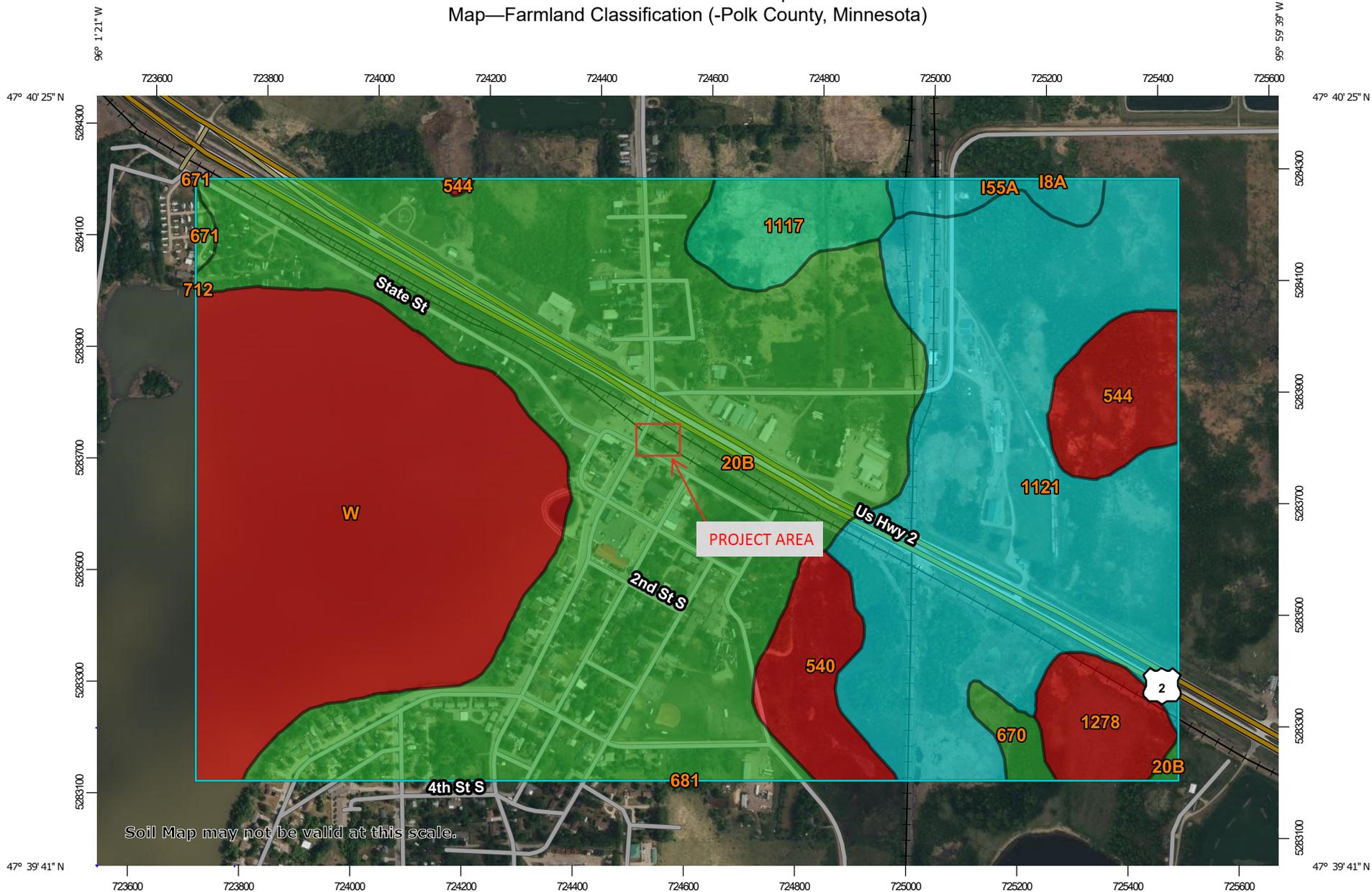
- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

The Farmland Protection Policy Act (FPPA) does not apply due to the proposed project being within the City limits of Erskine. Project construction will occur in the existing road right-of-way and will not convert any agricultural land to a non-agricultural use.

Custom Soil Resource Report

Map—Farmland Classification (-Polk County, Minnesota)



Custom Soil Resource Report

MAP LEGEND

Area of Interest (AOI)

 Area of Interest (AOI)

Soils

Soil Rating Polygons

-  Not prime farmland
-  All areas are prime farmland
-  Prime farmland if drained
-  Prime farmland if protected from flooding or not frequently flooded during the growing season
-  Prime farmland if irrigated
-  Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season
-  Prime farmland if irrigated and drained
-  Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season

-  Prime farmland if subsoiled, completely removing the root inhibiting soil layer
-  Prime farmland if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60
-  Prime farmland if irrigated and reclaimed of excess salts and sodium
-  Farmland of statewide importance
-  Farmland of statewide importance, if drained
-  Farmland of statewide importance, if protected from flooding or not frequently flooded during the growing season
-  Farmland of statewide importance, if irrigated

-  Farmland of statewide importance, if drained and either protected from flooding or not frequently flooded during the growing season
-  Farmland of statewide importance, if irrigated and drained
-  Farmland of statewide importance, if irrigated and either protected from flooding or not frequently flooded during the growing season
-  Farmland of statewide importance, if subsoiled, completely removing the root inhibiting soil layer
-  Farmland of statewide importance, if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60

-  Farmland of statewide importance, if irrigated and reclaimed of excess salts and sodium
-  Farmland of statewide importance, if drained or either protected from flooding or not frequently flooded during the growing season
-  Farmland of statewide importance, if warm enough, and either drained or either protected from flooding or not frequently flooded during the growing season
-  Farmland of statewide importance, if warm enough
-  Farmland of statewide importance, if thawed
-  Farmland of local importance
-  Farmland of local importance, if irrigated

-  Farmland of unique importance
-  Not rated or not available

Soil Rating Lines

-  Not prime farmland
-  All areas are prime farmland
-  Prime farmland if drained
-  Prime farmland if protected from flooding or not frequently flooded during the growing season
-  Prime farmland if irrigated
-  Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season
-  Prime farmland if irrigated and drained
-  Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season

Custom Soil Resource Report

| | | | | | | | | | |
|---|--|---|---|---|--|---|--|---|--|
|  | Prime farmland if subsoiled, completely removing the root inhibiting soil layer |  | Farmland of statewide importance, if drained and either protected from flooding or not frequently flooded during the growing season |  | Farmland of statewide importance, if irrigated and reclaimed of excess salts and sodium |  | Farmland of unique importance |  | Prime farmland if subsoiled, completely removing the root inhibiting soil layer |
|  | Prime farmland if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60 |  | Farmland of statewide importance, if irrigated and drained |  | Farmland of statewide importance, if drained or either protected from flooding or not frequently flooded during the growing season |  | Not prime farmland |  | Prime farmland if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60 |
|  | Prime farmland if irrigated and reclaimed of excess salts and sodium |  | Farmland of statewide importance, if irrigated and either protected from flooding or not frequently flooded during the growing season |  | Farmland of statewide importance, if warm enough, and either drained or either protected from flooding or not frequently flooded during the growing season |  | All areas are prime farmland |  | Prime farmland if irrigated and reclaimed of excess salts and sodium |
|  | Farmland of statewide importance |  | Farmland of statewide importance, if irrigated and either protected from flooding or not frequently flooded during the growing season |  | Farmland of statewide importance, if warm enough, and either drained or either protected from flooding or not frequently flooded during the growing season |  | Prime farmland if protected from flooding or not frequently flooded during the growing season |  | Farmland of statewide importance |
|  | Farmland of statewide importance, if drained |  | Farmland of statewide importance, if subsoiled, completely removing the root inhibiting soil layer |  | Farmland of statewide importance, if subsoiled, completely removing the root inhibiting soil layer |  | Prime farmland if irrigated |  | Farmland of statewide importance, if drained |
|  | Farmland of statewide importance, if protected from flooding or not frequently flooded during the growing season |  | Farmland of statewide importance, if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60 |  | Farmland of statewide importance, if warm enough |  | Prime farmland if drained and either protected from flooding or not frequently flooded during the growing season |  | Farmland of statewide importance, if protected from flooding or not frequently flooded during the growing season |
|  | Farmland of statewide importance, if irrigated |  | Farmland of statewide importance, if thawed |  | Farmland of statewide importance, if thawed |  | Prime farmland if irrigated and drained |  | Farmland of statewide importance, if irrigated |
| | | | Farmland of local importance |  | Farmland of local importance |  | Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season | | |
| | | | Farmland of local importance, if irrigated |  | Farmland of local importance, if irrigated | | | | |

Custom Soil Resource Report

| | | | |
|---|---|---|---|
| <ul style="list-style-type: none"> Farmland of statewide importance, if drained and either protected from flooding or not frequently flooded during the growing season Farmland of statewide importance, if irrigated and drained Farmland of statewide importance, if irrigated and either protected from flooding or not frequently flooded during the growing season Farmland of statewide importance, if subsoiled, completely removing the root inhibiting soil layer Farmland of statewide importance, if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60 | <ul style="list-style-type: none"> Farmland of statewide importance, if irrigated and reclaimed of excess salts and sodium Farmland of statewide importance, if drained or either protected from flooding or not frequently flooded during the growing season Farmland of statewide importance, if warm enough, and either drained or either protected from flooding or not frequently flooded during the growing season Farmland of statewide importance, if warm enough Farmland of statewide importance, if thawed Farmland of local importance Farmland of local importance, if irrigated | <ul style="list-style-type: none"> Farmland of unique importance Not rated or not available <p>Water Features</p> <ul style="list-style-type: none"> Streams and Canals <p>Transportation</p> <ul style="list-style-type: none"> Rails Interstate Highways US Routes Major Roads Local Roads <p>Background</p> <ul style="list-style-type: none"> Aerial Photography | <p>The soil surveys that comprise your AOI were mapped at 1:20,000.</p> <div style="border: 1px solid black; padding: 5px; margin: 10px 0;"> <p>Warning: Soil Map may not be valid at this scale.</p> <p>Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.</p> </div> <p>Please rely on the bar scale on each map sheet for map measurements.</p> <p>Source of Map: Natural Resources Conservation Service Web Soil Survey URL: Coordinate System: Web Mercator (EPSG:3857)</p> <p>Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.</p> <p>This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.</p> <p>Soil Survey Area: Polk County, Minnesota Survey Area Data: Version 20, Sep 10, 2025</p> <p>Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.</p> <p>Date(s) aerial images were photographed: Apr 1, 2021—Oct 1, 2021</p> <p>The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.</p> |
|---|---|---|---|

Table—Farmland Classification (-Polk County, Minnesota)

| Map unit symbol | Map unit name | Rating | Acres in AOI | Percent of AOI |
|------------------------------------|---|----------------------------------|--------------|----------------|
| 20B | Chapett fine sandy loam, 2 to 6 percent slopes | All areas are prime farmland | 194.2 | 41.1% |
| 540 | Seelyeville-Seelyeville, ponded, complex, 0 to 1 percent slopes | Not prime farmland | 14.3 | 3.0% |
| 544 | Cathro muck, occasionally ponded, 0 to 1 percent slopes | Not prime farmland | 13.9 | 2.9% |
| 670 | Knute fine sandy loam | All areas are prime farmland | 3.4 | 0.7% |
| 671 | Onstad loam | All areas are prime farmland | 0.9 | 0.2% |
| 681 | Brandsvold loam | Prime farmland if drained | 0.0 | 0.0% |
| 712 | Rosewood fine sandy loam | Farmland of statewide importance | 0.0 | 0.0% |
| 1117 | Hedman loam | Prime farmland if drained | 13.4 | 2.8% |
| 1121 | Hedman loam, depressional | Farmland of statewide importance | 109.4 | 23.1% |
| 1278 | Rosewood-Venlo complex | Not prime farmland | 11.3 | 2.4% |
| l8A | Cathro muck, 0 to 1 percent slopes | Not prime farmland | 0.1 | 0.0% |
| l55A | Rosewood fine sandy loam, Aspen Parkland, 0 to 1 percent slopes | Farmland of statewide importance | 5.4 | 1.1% |
| W | Water | Not prime farmland | 106.9 | 22.6% |
| Totals for Area of Interest | | | 473.2 | 100.0% |

Rating Options—Farmland Classification (-Polk County, Minnesota)

Aggregation Method: No Aggregation Necessary

Tie-break Rule: Lower



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Floodplain Management (CEST and EA)

| General Requirements | Legislation | Regulation |
|---|---|------------|
| Executive Order 11988, Floodplain Management, requires Federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable. | Executive Order 11988 Executive Order 13690 42 USC <u>4001-4128</u> 42 USC 5154a | 24 CFR 55 |
| Reference | | |
| https://www.hudexchange.info/environmental-review/floodplain-management | | |

1. Does this project meet an exemption at [24 CFR 55.12](#) from compliance with HUD’s floodplain management regulations in Part 55 or utilize the delayed compliance date for certain Office of Housing programs?

Yes

Select the applicable citation at [24 CFR 55.12](#) and provide supporting documentation for the determination if applicable.

- a) HUD-assisted activities described in 24 CFR 58.34 and 58.35(b)
- b) HUD-assisted activities described in 24 CFR 50.19, except as otherwise indicated in § 50.19
- c) The approval of financial assistance for restoring and preserving the natural and beneficial functions and values of floodplains and wetlands, including through acquisition of such floodplain and wetland property, where a permanent covenant or comparable restriction is place on the property’s continued use for flood control, wetland projection, open space, or park land, but only if:
 - (1) The property is cleared of all existing buildings and walled structures; and
 - (2) The property is cleared of related improvements except those which:
 - (i) Are directly related to flood control, wetland protection, open space, or park land (including playgrounds and recreation areas);
 - (ii) Do not modify existing wetland areas or involve fill, paving, or other ground disturbance beyond minimal trails or paths; and
 - (iii) Are designed to be compatible with the beneficial floodplain or wetland function of the property.
- d) An action involving a repossession, receivership, foreclosure, or similar acquisition of property to protect or enforce HUD's financial interests under previously approved loans, grants, mortgage insurance, or other HUD assistance

- e) Policy-level actions described at 24 CFR 50.16 that do not involve site-based decisions
- f) A minor amendment to a previously approved action with no additional adverse impact on or from a floodplain or wetland;
- g) HUD's or the responsible entity's approval of a project site, an incidental portion of which is situated in the FFRMS floodplain (not including the floodway, LiMWA, or coastal high hazard area) but only if:
 - (1) The proposed project site does not include any existing or proposed buildings or improvements that modify or occupy the FFRMS floodplain except de minimis improvements such as recreation areas and trails; and
 - (2) the proposed project will not result in any new construction in or modifications of a wetland
- h) Issuance or use of Housing Vouchers or other forms of rental subsidy where HUD, the awarding community, or the public housing agency that administers the contract awards rental subsidies that are not project-based (i.e., do not involve site-specific subsidies)
- i) Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and persons with disabilities.

Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.

Yes. Office of Housing programs utilizing the January 1, 2025 compliance date. These reviews must comply with the 2013 version of the Part 55 regulations. Continue to Worksheet Summary for 2013 version to upload supporting documentation.

No. *Continue to Question 2.*

2. Does the project include a Critical Action?

Yes. Describe the Critical Action. Examples of Critical Actions include projects involving hospitals, fire and police stations, nursing homes, hazardous chemical storage, storage of valuable records, and utility plants. Continue to Question 4.

No. Continue to Question 3.

3. Determine the extent of the FFRMS floodplain and provide mapping documentation in support of that determination.

The extent of the FFRMS floodplain can be determined using a Climate Informed Science Approach (CISA), 0.2 percent flood approach (0.2 PFA), or freeboard value approach (FVA). For

projects in areas without available CISA data or without FEMA Flood Insurance Rate Maps (FIRMs), Flood Insurance Studies (FISs) or Advisory Base Flood Elevations (ABFEs), use the best available information to determine flood elevation. Include documentation and an explanation of why this is the best available information for the site. Note that newly constructed and substantially improved structures must be elevated to the FFRMS floodplain regardless of the approach chosen to determine the floodplain.

Select one of the following three options:

CISA for non-critical actions. If using a local tool, data, or resources, ensure that the FFRMS elevation is higher than would have been determined using the 0.2 PFA or the FVA.

0.2-PFA. Where FEMA has defined the 0.2-percent-annual-chance floodplain, the FFRMS floodplain is the area that FEMA has designated as within the 0.2-percent-annual-chance floodplain.

FVA. If neither CISA nor 0.2-PFA is available, for non-critical actions, the FFRMS floodplain is the area that results from adding two feet to the base flood elevation as established by the effective FIRM or FIS or—if available —a FEMA-provided preliminary or pending FIRM or FIS or advisory base flood elevations, whether regulatory or informational in nature. However, an interim or preliminary FEMA map cannot be used if it is lower than the current FIRM or FIS.

a. Does your project occur in the FFRMS floodplain?

Yes, continue to part b.

No. Review for floodplain management is complete.

b. Is your project located in any of the floodplain categories below? Select all that apply. If none apply, continue to question 7.

Floodway: *Continue to Question 5. Floodways.*

Coastal High Hazard Area (V Zone) or Limit of Moderate Wave Action (LiMWA): *Continue to Question 6. Coastal High Hazard Areas and LiMWAs.*

4. Determine the extent of the FFRMS floodplain and provide mapping documentation in support of that determination.

The extent of the FFRMS floodplain can be determined using a Climate Informed Science Approach (CISA), or the higher of the 0.2 percent flood approach (0.2 PFA), or freeboard value approach (FVA). For projects in areas without available CISA data or without FEMA Flood Insurance Rate Maps (FIRMs), Flood Insurance Studies (FISs) or Advisory Base Flood Elevations (ABFEs), use the best available information to determine flood elevation. Note that newly constructed and substantially improved structures must be elevated to the FFRMS floodplain regardless of the approach chosen to determine the floodplain.

Utilize CISA to determine the FFRMS floodplain for critical actions

CISA for Critical Actions. If using a local tool, ensure that the FFRMS elevation provided is higher than the 0.2 PFA or 3' above the base flood elevation.

OR;

Choose the higher of 0.2 PFA or FVA elevations

0.2-PFA. Where FEMA has defined the 0.2-percent-annual-chance floodplain, the FFRMS floodplain is the area that FEMA has designated as within the 0.2-percent-annual-chance floodplain.

FVA. For critical actions, the FFRMS floodplain is the area that results from adding three feet to the base flood elevation as established by the effective FEMA FIRM or FIS or—if available—a FEMA-provided preliminary or pending FIRM or FIS or advisory base flood elevations, whether regulatory or informational in nature. However, an interim or preliminary FEMA map cannot be used if it is lower than the current FIRM or FIS.

a. Does your project occur in the FFRMS floodplain?

Yes, continue to part b.

No. Review for floodplain management is complete.

b. Is your project located in any of the floodplain categories below? Select all that apply. If none apply, continue to question 7.

Floodway: *Continue to Question 5. Floodways.*

Coastal High Hazard Area (V Zone) or LiMWA: *Continue to Question 6. Coastal High Hazard Areas and LiMWAs.*

5. Floodways

Do the floodway exemptions at [55.8](#) or [55.21](#) apply?

Yes

The 8-Step Process is required. Document mitigation measures necessary to meet the requirements in 55.8 or 55.21. Provide a completed 8-Step Process, including the early public notice and the final notice.

Continue to Question 7. 8-Step Process.

No

Federal assistance may not be used at this location. You must either choose an alternate site or cancel the project at this location.

6. Coastal High Hazard Area (V Zone) and LiMWAs

Do the exemptions at [55.8](#) or [55.21](#) apply?

Yes

The 8-Step Process is required. Document mitigation measures necessary to meet the requirements in 55.8 or 55.21. Provide a completed 8-Step Process, including the early public notice and the final notice.

Continue to Question 7. 8-Step Process.

No

Federal assistance may not be used at this location. You must either choose an alternate site or cancel the project at this location.

7. 8-Step Process.

Does the 8-Step Process apply? Select one of the following options:

8-Step Process is inapplicable per 55.13.

Select the applicable citation:

- (a) HUD's mortgage insurance actions and other financial assistance for the purchasing, mortgaging, or refinancing of existing one- to four-family properties in communities that are in the Regular Program of the NFIP and in good standing (i.e., not suspended from program eligibility or placed on probation under 44 CFR 59.24), where the action is not a critical action and the property is not located in a floodway, coastal high hazard area, or LiMWA;
- (b) Financial assistance for minor repairs or improvements on one- to four-family properties that do not meet the thresholds for "substantial improvement" under § 55.2(b)(12);
- (c) HUD or a recipient's actions involving the disposition of individual HUD or recipient held, one- to four-family properties;
- (d) HUD guarantees under the Loan Guarantee Recovery Fund Program (24 CFR part 573), where any new construction or rehabilitation financed by the existing loan or mortgage has been completed prior to the filing of an application under the program, and the refinancing will not allow further construction or rehabilitation, nor result in any physical impacts or changes except for routine maintenance;
- (e) The approval of financial assistance to lease units within an existing structure located within the floodplain, but only if;
 - (1) The structure is located outside the floodway or coastal high hazard area, and is in a community that is in the Regular Program of the NFIP and in good standing (i.e., not suspended from program eligibility or placed on probation under 44 CFR 59.24); and
 - (2) The project is not a critical action; and
 - (3) The entire structure is or will be fully insured or insured to the maximum extent available under the NFIP for at least the term of the lease.
- (f) Special projects for the purpose of improving efficiency of utilities or installing renewable energy that involve the repair, rehabilitation, modernization, weatherization, or improvement of existing structures or infrastructure, do not meet the thresholds for "substantial improvement" under § 55.2(b)(12), and do not include the installation of equipment below the FFRMS floodplain elevation.

Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.

5-Step Process is applicable per 55.14.

Provide documentation of 5-Step Process.

Select the applicable citation:

- (a) HUD actions involving the disposition of HUD-acquired multifamily housing projects or “bulk sales” of HUD-acquired one- to four-family properties in communities that are in the Regular Program of the National Flood Insurance Program (NFIP) and in good standing (i.e., not suspended from program eligibility or placed on probation under 44 CFR 59.24).
- (b) HUD's actions under the National Housing Act (12 U.S.C. 1701) for the purchase or refinancing of existing multifamily housing projects, hospitals, nursing homes, assisted living facilities, board and care facilities, and intermediate care facilities, in communities that are in good standing under the NFIP.
- (c) HUD's or the recipient's actions under any HUD program involving the repair, rehabilitation, modernization, weatherization, or improvement of existing multifamily housing projects, hospitals, nursing homes, assisted living facilities, board and care facilities, intermediate care facilities, and one- to four-family properties, in communities that are in the Regular Program of the National Flood Insurance Program (NFIP) and are in good standing, provided that the number of units is not increased more than 20 percent, the action does not involve a conversion from nonresidential to residential land use, the action does not meet the thresholds for “substantial improvement” under § 55.2(b)(10), and the footprint of the structure and paved areas is not increased by more than 20 percent.
- (d) HUD's (or the recipient's) actions under any HUD program involving the repair, rehabilitation, modernization, weatherization, or improvement of existing nonresidential buildings and structures, in communities that are in the Regular Program of the NFIP and are in good standing, provided that the action does not meet the thresholds for “substantial improvement” under § 55.2(b)(10) and that the footprint of the structure and paved areas is not increased by more than 20 percent
- (e) HUD's or the recipient's actions under any HUD program involving the repair, rehabilitation, or replacement of existing nonstructural improvements including streets, curbs and gutters, where any increase of the total impervious surface area of the facility is de minimis. This provision does not include critical actions, levee systems, chemical storage facilities (including any tanks), wastewater facilities, or sewer lagoons.

Continue to Question 8. Mitigation.

8-Step Process applies.

Provide a completed 8-Step Process, including the early public notice and the final notice.

Continue to Question 8. Mitigation.

8. Mitigation

For the project to comply with this section, all adverse impacts must be mitigated. Explain in detail the measures that must be implemented to mitigate the impact or effect, including the timeline for implementation. Note: newly constructed and substantially improved structures

within the FFRMS floodplain must be elevated to the FFRMS floodplain elevation or floodproofed, if applicable.

Which of the following if any mitigation/minimization measures have been identified for this project in the 8-Step or 5-Step Process? Select all that apply.

- Buyout and demolition or other supported clearance of floodplain structures
- Insurance purchased in excess of statutory requirement under the Flood Disaster Protection Act of 1973
- Permeable surfaces
- Natural landscape enhancements that maintain or restore natural hydrology
- Planting or restoring native plant species
- Bioswales
- Stormwater capture and reuse
- Green or vegetative roofs with drainage provisions
- Natural Resources Conservation Service conservation easements or similar easements
- Floodproofing of structures as allowable (e.g. non-residential floors)
- Elevating structures (including freeboard above the required base flood elevations)
- Levee or structural protection from flooding
- Channelizing or redefining the floodway or floodplain through a Letter of Map Revision (LOMR)

Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.

Worksheet Summary

Compliance Determination

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- FIRM panel numbers
- CISA data or maps
- Information on other data or tools used or accessed
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Include all documentation supporting your findings in your submission to HUD

Worksheet Summary for 2013 Version
Compliance Determination

Attach 'Floodplain Management Partner Worksheet' (OMB No. 2506-0177), FIRM map indicating project location, and summary of 8-step or 5-step decision making process if applicable.

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

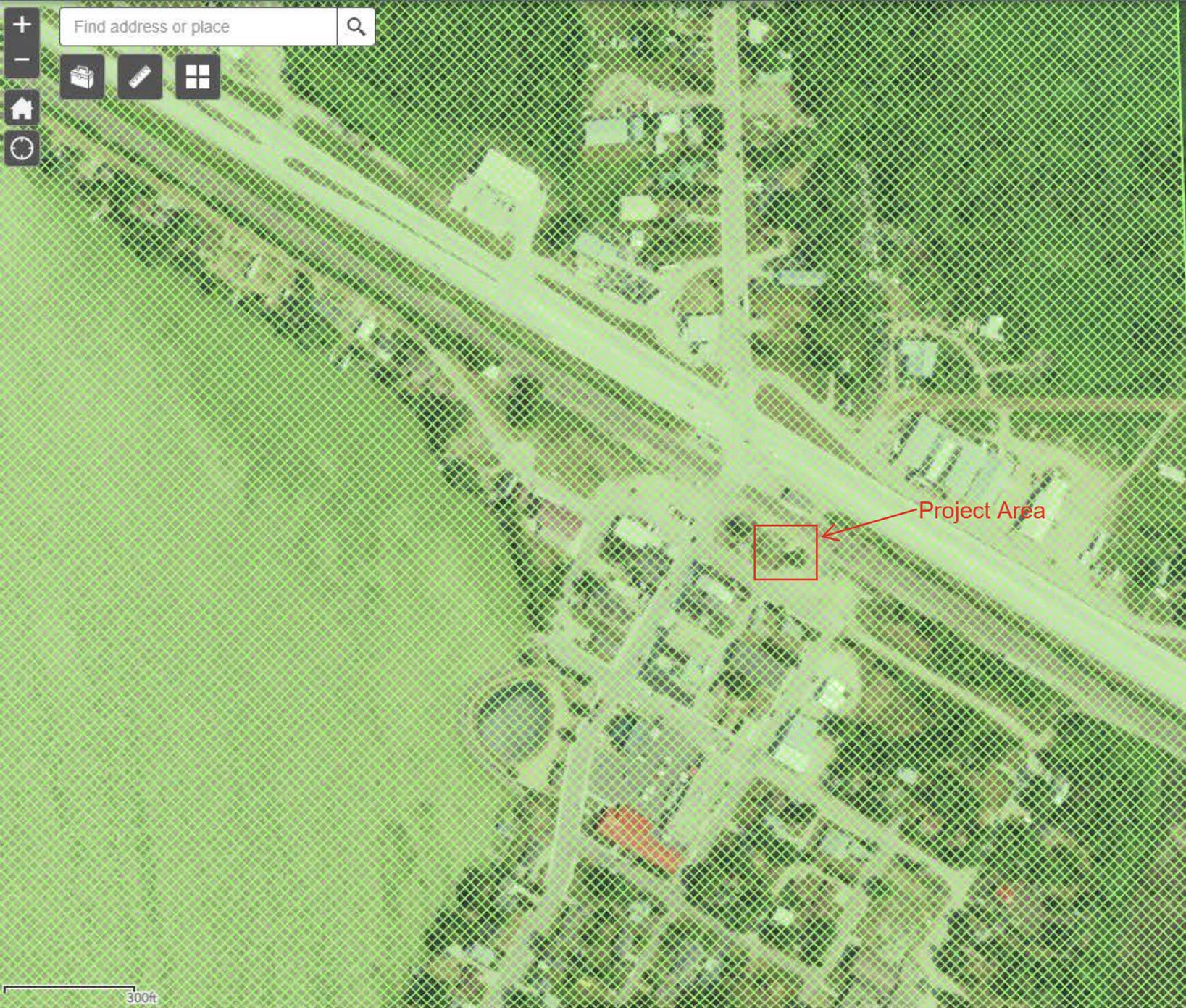
- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your region

Include all documentation supporting your findings in your submission to HUD

According to the FEMA National Flood Hazard Layer, the project area is located in an unmapped zone, meaning FEMA has not assigned a specific flood hazard designation for this location. Additionally, no local sources identified the project area to be in a floodplain. Based on available information, the project is not anticipated to impact any floodplains.

Find address or place

Navigation icons: Home, Refresh, Full Screen, Print, Measure, Scale



2705030350B
eff. 8/15/1983

Legend

Effective FIRM Panels

GeoIndex

- No Digital Data Available (Green grid)
- Digital Data Available (Light Green)
- Unmapped (Dark Green)

NFHL

LOMRs

Status

- Effective (Blue outline)

LOMAs

- (Purple dot)

Political Jurisdictions

- (Yellow outline)

Profile Baselines

- (Blue line)

Cross-Sections

- (Black line)

Base Flood Elevations

- (Wavy line)

Levees

- (Double vertical lines)

Coastal Transects

- (Dashed line)

Transect Baselines

- (Black line)

General Structures



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-1000

This Worksheet was designed to be used by those “Partners” (including Public Housing Authorities, consultants, contractors, and nonprofits) who assist Responsible Entities and HUD in preparing environmental reviews, but legally cannot take full responsibilities for these reviews themselves. Responsible Entities and HUD should use the RE/HUD version of the Worksheet.

Historic Preservation (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/historic-preservation>

Threshold

Is Section 106 review required for your project?

- No, because a Programmatic Agreement states that all activities included in this project are exempt. (See the [PA Database](#) to find applicable PAs.)

Either provide the PA itself or a link to it here. Mark the applicable exemptions or include the text here:

Click here to enter text.

→ *Continue to the Worksheet Summary.*

- No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].

Either provide the memo itself or a link to it here. Explain and justify the other determination here:

Click here to enter text.

→ *Continue to the Worksheet Summary.*

- Yes, because the project includes activities with potential to cause effects (direct or indirect).

→ *Continue to Step 1.*

The Section 106 Process

After determining the need to do a Section 106 review, HUD or the RE will initiate consultation with regulatory and other interested parties, identify and evaluate historic properties, assess effects of the project on properties listed on or eligible for the National Register of Historic Places, and resolve any adverse effects through project design modifications or mitigation.

Step 1: Initiate consultation

Step 2: Identify and evaluate historic properties

Step 3: Assess effects of the project on historic properties

Step 4: Resolve any adverse effects

Only RE or HUD staff may initiate the Section 106 consultation process. Partner entities may gather information, including from SHPO records, identify and evaluate historic properties, and make initial assessments of effects of the project on properties listed in or eligible for the National Register of Historic Place. Partners should then provide their RE or HUD with all of their analysis and documentation so that they may initiate consultation.

Step 1 - Initiate Consultation

The following parties are entitled to participate in Section 106 reviews: Advisory Council on Historic Preservation; State Historic Preservation Officers (SHPOs); federally recognized Indian tribes/Tribal Historic Preservation Officers (THPOs); Native Hawaiian Organizations (NHOs); local governments; and project grantees. The general public and individuals and organizations with a demonstrated interest in a project may participate as consulting parties at the discretion of the RE or HUD official. Participation varies with the nature and scope of a project. Refer to HUD's website for guidance on consultation, including the required timeframes for response. Consultation should begin early to enable full consideration of preservation options.

Use the [When To Consult With Tribes checklist](#) within [Notice CPD-12-006: Process for Tribal Consultation](#) to determine if the RE or HUD should invite tribes to consult on a particular project. Use the [Tribal Directory Assessment Tool \(TDAT\)](#) to identify tribes that may have an interest in the area where the project is located. Note that only HUD or the RE may initiate consultation with Tribes. Partner entities may prepare a draft letter for the RE or HUD to use to initiate consultation with tribes, but may not send the letter themselves.

List all organizations and individuals that you believe may have an interest in the project here:

The State Historic Preservation Office (SHPO) provided a comment letter on December 12, 2025, with a finding of No Historic Properties Affected for the proposed project. A tribal consultation letter was sent to the identified tribes on December 3, 2025, using contacts obtained through the Tribal Directory Assessment Tool (TDAT). Two tribal responses were received during consultation from the Turtle Mountain Band of Chippewa Indians and the Leech Lake Band of Ojibwe. Neither tribe expressed any concerns regarding the proposed project, and both indicated that the project would not affect historic properties. In the event that any human remains or cultural artifacts are encountered during construction, all work will cease immediately, and the appropriate authorities will be contacted.

→ *Continue to Step 2.*

Step 2 - Identify and Evaluate Historic Properties

Provide a preliminary definition of the Area of Potential Effect (APE), either by entering the address(es) or providing a map depicting the APE. Attach an additional page if necessary.

Attached is a map of the APE.

Gather information about known historic properties in the APE. Historic buildings, districts and archeological sites may have been identified in local, state, and national surveys and registers, local historic districts, municipal plans, town and county histories, and local history websites. If not already listed on the National Register of Historic Places, identified properties are then evaluated to see if they are eligible for the National Register. Refer to HUD's website for guidance on identifying and evaluating historic properties.

In the space below, list historic properties identified and evaluated in the APE.

Every historic property that may be affected by the project should be listed. For each historic property or district, include the National Register status, whether the SHPO has concurred with the finding, and whether information on the site is sensitive. Attach an additional page if necessary.

A review of the EPA NEPAAssist database and the National Register of Historic Places (NRHP) confirmed that there are no historic properties within the City of Erskine or in the vicinity of the proposed project area. Therefore, the project will have no effect on historic or cultural resources.

Provide the documentation (survey forms, Register nominations, concurrence(s) and/or objection(s), notes, and photos) that justify your National Register Status determination.

Was a survey of historic buildings and/or archeological sites done as part of the project?

If the APE contains previously unsurveyed buildings or structures over 50 years old, or there is a likely presence of previously unsurveyed archeological sites, a survey may be necessary. For Archeological surveys, refer to HP Fact Sheet #6, [Guidance on Archeological Investigations in HUD Projects](#).

Yes → Provide survey(s) and report(s) and continue to Step 3.

Additional notes:

[Click here to enter text.](#)

No → Continue to Step 3.

Step 3 - Assess Effects of the Project on Historic Properties

Only properties that are listed on or eligible for the National Register of Historic Places receive further consideration under Section 106. Assess the effect(s) of the project by applying the Criteria of Adverse Effect. ([36 CFR 800.5](#)) Consider direct and indirect effects as applicable as per HUD guidance.

Choose one of the findings below to recommend to the RE or HUD.

Please note: this is a recommendation only. It is **not the official finding, which will be made by the RE or HUD, but only your suggestion as a Partner entity.**

No Historic Properties Affected

Document reason for finding:

No historic properties present.

Historic properties present, but project will have no effect upon them.

No Adverse Effect

Document reason for finding and provide any comments below.

Comments may include recommendations for mitigation, monitoring, a plan for unanticipated discoveries, etc.

[Click here to enter text.](#)

Adverse Effect

Document reason for finding:

Copy and paste applicable Criteria into text box with summary and justification.

Criteria of Adverse Effect: [36 CFR 800.5](#)

[Click here to enter text.](#)

Provide any comments below:

Comments may include recommendations for avoidance, minimization, and/or mitigation.

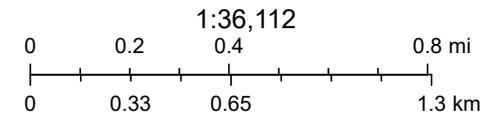
[Click here to enter text.](#)

Remember to provide all documentation that justifies your National Register Status determination and recommendations along with this worksheet.

National Register of Historic Places



January 12, 2026



Vantor, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, EPA OEI, OFA

12/12/2025

VIA EMAIL ONLY

Subject: SHPO Comment on Project Submission

Project Activity: Rehabilitation

Project Description: City of Erskine Elevated Water Tower Number One Rehabilitation

City/Township: Erskine

County: Polk

Township/Range/Section: T148 R42 S4 NE

SHPO Number: 2026-0145

Thank you for the opportunity to comment on the project submission received on 11/20/2025. We have reviewed the project in accordance with the responsibilities outlined for the State Historic Preservation Officer under Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108) and its implementing federal regulations, "Protection of Historic Properties" (36 CFR Part 800).

Based on available information, we conclude that a finding of **No Historic Properties Affected** is appropriate for this project.

If you have any questions regarding our comment letter, please send them to ENReviewSHPO@state.mn.us and reference the SHPO number.

Sincerely,



Amy Spang
Deputy State Historic Preservation Officer

| Tribal Name | Last Name | First Name | Title | Email | THPC URL | Last Update Datetime |
|--|-----------|------------|--------------------------------------|---|---|----------------------|
| Apache Tribe of Oklahoma | Cooper | Durell | Chairman | durrell.cooper@apachetribe.org | N http://www.apachetribe.org/ | 31-Jul-2025 12:34:49 |
| Cheyenne and Arapaho Tribes, Oklahoma | Bear | Max | THPO | mbear@cheyenneandrapaho-nsn.gov | Y http://www.c-a-tribes.org | 13-Aug-2025 10:20:36 |
| Cheyenne and Arapaho Tribes, Oklahoma | Wassana | Reggie | Governor | rwassana@c-a-tribes.org | N http://www.c-a-tribes.org | 13-Aug-2025 10:20:35 |
| Fort Belknap Indian Community of the Fort Belknap Reservation of Montana | Blackwolf | Michael | THPO | mblackwolf@ftbelknap.org | Y http://www.ftbelknap.org/ | 26-Feb-2024 11:07:10 |
| Fort Belknap Indian Community of the Fort Belknap Reservation of Montana | Stiffarm | Jeffery | President | jeffery.stiffarm@ftbelknap.org | N http://www.ftbelknap.org/ | 18-Jun-2025 09:56:19 |
| Lac Vieux Desert Band of Lake Superior Chippewa Indians of Michigan | Shively | Alina | THPO Director | alina.shively@lvd-nsn.gov | N http://www.ldftribe.com | 26-Feb-2024 11:07:39 |
| Lac Vieux Desert Band of Lake Superior Chippewa Indians of Michigan | Williams | James | Chairman | jim.williams@lvd-nsn.gov | http://www.ldftribe.com | 08-May-2025 12:08:18 |
| Leech Lake Band of the Minnesota Chippewa Tribe | Jackson | Faron | Chairman | faron.jackson@llojibwe.org | N http://www.llojibwe.org | 31-Jan-2023 20:56:55 |
| Leech Lake Band of the Minnesota Chippewa Tribe | Lemon | Gina | Tribal Historic Preservation Officer | gina.lemon@llojibwe.net | N http://www.llojibwe.org | 12-Sep-2024 11:09:27 |
| Menominee Indian Tribe of Wisconsin | Grignon | David | Tribal Historic Preservation Officer | dgrignon@mitw.org | N http://www.menominee-nsn.gov/ | 05-Jun-2023 11:48:47 |
| Menominee Indian Tribe of Wisconsin | Kakkak | Gena | Chairwoman | chairman@mitw.org | N http://www.menominee-nsn.gov/ | 22-May-2025 09:26:24 |
| Red Lake Band of Chippewa Indians, Minnesota | Ferris | Kade | THPO | kade.ferris@redlakenation.org | Y http://www.redlakenation.org | 20-Aug-2024 12:07:40 |
| Red Lake Band of Chippewa Indians, Minnesota | Seki | Darrell | Chairman | dseki@redlakenation.org | N http://www.redlakenation.org | 18-Jun-2025 10:11:13 |
| Turtle Mountain Band of Chippewa Indians of North Dakota | Azure | Jamie | Chairman | | | 18-Jun-2025 10:14:34 |
| Turtle Mountain Band of Chippewa Indians of North Dakota | Azure | Jamie | Chairperson | jamie.azure@tmbci.org | N https://tmchippewa.com/ | 04-May-2023 10:41:51 |
| Turtle Mountain Band of Chippewa Indians of North Dakota | Longie | Larus | Tribal Historic Preservation Officer | larus.longie@tmbci.org | Y https://tmchippewa.com/ | 31-Jan-2023 21:33:59 |
| Upper Sioux Community, Minnesota | Jensvold | Kevin | Chairman | kevinj@upper Sioux community-nsn.gov | N http://www.upper Siou x community-nsn.gov | 18-Jun-2025 10:14:34 |
| Upper Sioux Community, Minnesota | Odegard | Samantha | THPO | samanthao@upper Sioux community-nsn.gov | Y http://www.upper Siou x community-nsn.gov | 26-Feb-2024 11:09:52 |
| White Earth Band of Minnesota Chippewa | Arsenault | Jaime | THPO and NAGPRA Representative | jaime.arsenault@whiteearth-nsn.gov | Y http://www.whiteearth.com | 31-Jan-2023 21:36:33 |
| White Earth Band of Minnesota Chippewa | Fairbanks | Michael | Chairman | michael.fairbanks@whiteearth-nsn.gov | N http://www.whiteearth.com | 31-Jan-2023 21:40:00 |



12/3/2025

Durell Cooper, Chairman
Apache Tribe of Oklahoma
511 East Colorado
Anadarko, OK 73005

Re: City of Erskine Water Tower Rehabilitation Project
Minnesota Small Cities Development Program funded by the HUD CDBG Program

Dear Chairman Cooper,

The City of Erskine is considering funding the project listed above with federal funds from the U.S. Department of Housing and Urban Development (HUD). Under HUD regulation 24 CFR 58.4, the City of Erskine has assumed HUD's environmental review responsibilities for the project, including tribal consultation related to historic properties. Historic properties include archeological sites, burial grounds, sacred landscapes or features, ceremonial areas, traditional cultural places and landscapes, plant and animal communities, and buildings and structures with significant tribal association.

City of Erskine will conduct a review of this project to comply with Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR Part 800. We would like to invite you to be a consulting party in this review to help identify historic properties in the project area that may have religious and cultural significance to your tribe, and if such properties exist, to help assess how the project might affect them. If the project might have an adverse effect, we would like to discuss possible ways to avoid, minimize or mitigate potential adverse effects.

A review of the National Register of Historic Places found no listed sites within the proposed project area or its surrounding area that would be negatively affected by the project. All work will occur within the existing water tower site and previously disturbed areas. The water tower, constructed in 1998, is not considered eligible for listing on the National Register of Historic

Places. SHPO was contacted on November 20, 2025, to review the proposed project; however, no comments have been received to date.

To meet project timeframes, if you would like to be a consulting party on this project, can you please let us know of your interest within 30 days? If you have any initial concerns with impacts of the project on religious or cultural properties, can you please note them in your response?

Enclosed is a map that shows the project area and, if applicable, an additional area of potential indirect effects. The project consists of rehabilitating the City's 250,000-gallon elevated water storage tower. Planned improvements include replacing the ladder safety climb devices, installing a new gasket on the bowl manway, adding a submersible mixer, and completing various joint welding upgrades. The project will also install a new tank vent, roof ventilation manway, and overflow pipe.

More information on the Section 106 review process is available at <http://www.onecpd.info/environmental-review/historic-preservation/>.

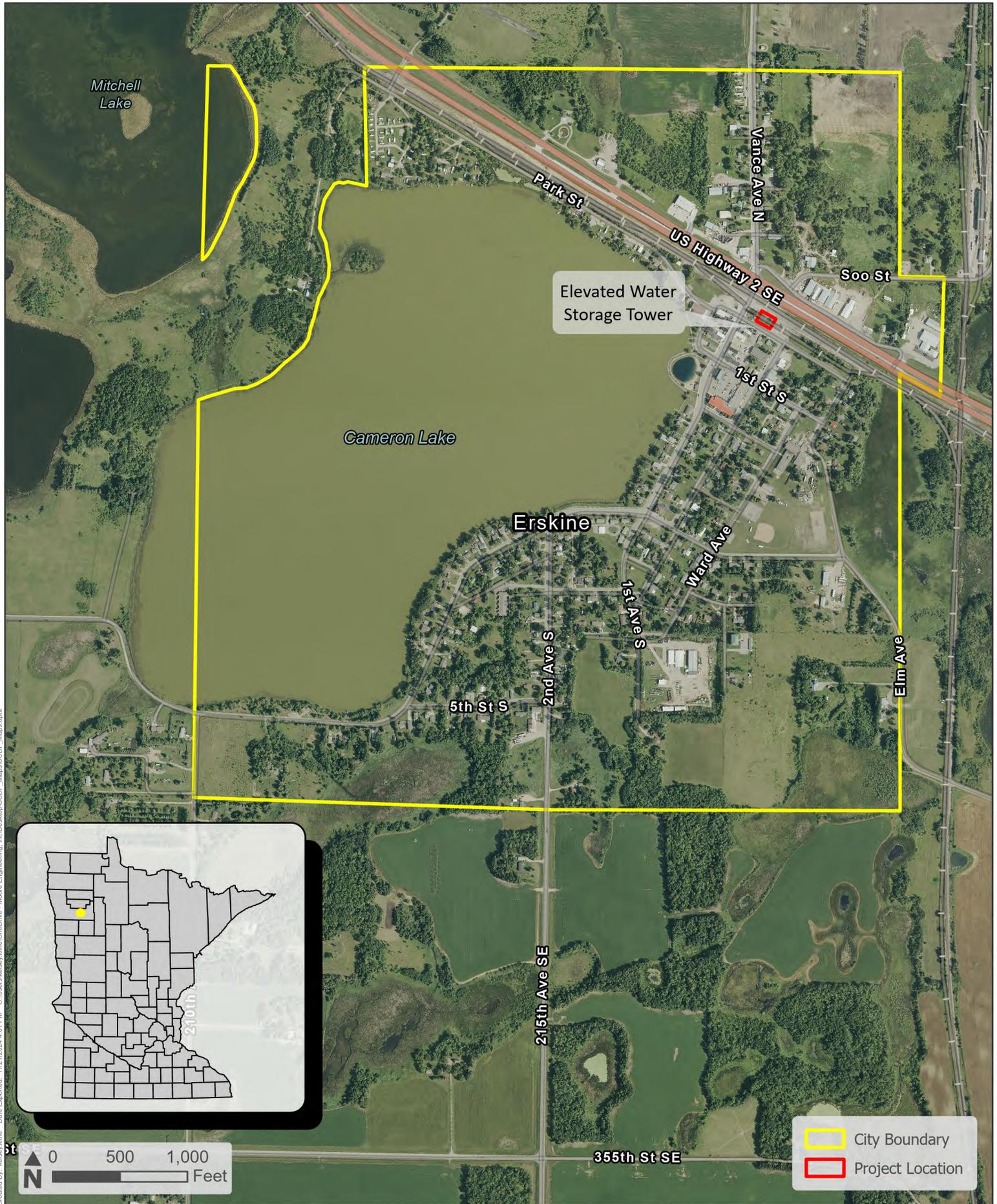
HUD's process for tribal consultation under Section 106 is described in a Notice available at <https://www.onecpd.info/resource/2448/notice-cpd-12-006-tribal-consultation-under-24-cfr-part-58>.

If you do not wish to consult on this project, can you please inform us? If you do wish to consult, can you please include in your reply the name and contact information for the tribe's principal representative in the consultation? Thank you very much. We value your assistance and look forward to consulting further if there are historic properties of religious and cultural significance to your tribe that may be affected by this project.

Sincerely,

A handwritten signature in black ink that reads "Angie Shimpa". The signature is written in a cursive, flowing style.

Angie Shimpa
Clerk/Treasurer
218-687-4646
cityerskine@gvtel.com
218-687-2805



Elevated Water Storage Tower

- City Boundary
- Project Location



Created By: kelsey.kline Date Exported: 11/21/2024 4:01 PM C:\Users\kelsey.kline\OneDrive - Moore Engineering, Inc\Desktop\SCDP - Maps\SCDP - Maps.aprx



LEECH LAKE BAND OF OJIBWE

Tribal Historic Preservation Office

Gina M Lemon, Tribal Historic Preservation Officer

Anita M Cloud, Tribal Historic Preservation Assistant

December 13, 2025

Via Internet

Moore Engineering, Inc.
Attn: Kelsey Kline, Environmental Scientist I
3315 Roosevelt Rd – Suite 300
St. Cloud, MN 56301

RE: City of Erskine Water Tower Rehabilitation Project.

Minnesota Small Cities Development Program funded by the HUD CDBG Program.

The project consists of rehabilitating the City's 250,000-gallon elevated water storage tower. Planned improvements include replacing the ladder safety climb devices, installing a new gasket on the bowl manway, adding a submersible mixer, and completing various joint welding upgrades. The project will also install a new tank vent, roof ventilation manway, and overflow pipe.

Sec. 4, T.148N, R.42W.

LL THPO No. 25-600-NCRI

Dear Kelsey Kline,

Thank you for the opportunity to comment on the above referenced project. This has been reviewed pursuant to the responsibilities given to the Tribal Historic Preservation Officer (THPO) by the National Historic Preservation Act of 1966, as amended in 1992, and the Procedures of the Advisory Council on Historic Preservation (38CFR800).

I have reviewed the documentation. After careful consideration of our records, I have determined that the Leech Lake Band of Ojibwe does not have any recorded historic properties, within this area. ** This does not mean there are not any cultural resources present, at this time. **

Should any human remains or suspected human remains be encountered, all work shall cease and the following personnel should be notified immediately: County Sheriff's Office, Office of the State Archaeologist, and the Leech Lake Band of Ojibwe along with other interested parties.

Please note the above determination does not "exempt" future projects from Section 106 review. In the event of any other tribe notifying you of an issue or us (LLBO) of concerns for this specific project, we may reenter into the consultation process.

You may contact me at **(218) 335-2940** if you have questions regarding our review of this project. Please refer to the **LL-THPO Number** as stated above in all correspondence with this project.

Respectfully submitted,

Gina M Lemon

Tribal Historic Preservation Officer

Leech Lake Tribal Historic Preservation Office - Established in 1996

190 Sailstar Drive NE * Cass Lake, MN 56633

Gina.lemon@llojibwe.net

From: Larus Longie <larus.longie@tmbci.org>
Sent: Thursday, December 4, 2025 8:31 AM
To: Kelsey Kline
Subject: RE: City of Erskine Water Tower Rehabilitation Project Tribal Consultation

Follow Up Flag: Follow up
Flag Status: Flagged

Based on the submitted report TMBCI THPO office concur no effect to historic properties during project Erskine Water Rehabilitation. Larus Longie THPO

From: Kelsey Kline <Kelsey.Kline@mooreengineeringinc.com>
Sent: Wednesday, December 3, 2025 4:08 PM
To: Jamie S. Azure <jamie.azure@tmbci.org>
Cc: Larus Longie <larus.longie@tmbci.org>
Subject: City of Erskine Water Tower Rehabilitation Project Tribal Consultation

Hello,

Please see the attached letter regarding the City of Erskine Water Tower Rehabilitation Project located in Erskine, Minnesota. This letter is being sent on behalf of the City of Erskine as part of the project's coordination process. We request your review of the attached document and welcome any comments, questions, or concerns you may have regarding the project.

Please feel free to respond directly to this email with any feedback at your earliest convenience.

Kelsey Kline
Environmental Scientist I
moore engineering, inc.

Phone 320-281-5493 ext. 1109
3315 Roosevelt Road, Suite 300, St. Cloud, MN 56301
kelsey.kline@mooreengineeringinc.com | www.mooreengineeringinc.com

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U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-1000

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Noise (EA Level Reviews) – PARTNER

<https://www.hudexchange.info/programs/environmental-review/noise-abatement-and-control>

1. What activities does your project involve? Check all that apply:

- New construction for residential use

NOTE: HUD assistance to new construction projects is generally prohibited if they are located in an Unacceptable zone, and HUD discourages assistance for new construction projects in Normally Unacceptable zones. See 24 CFR 51.101(a)(3) for further details.

→ Continue to Question 2.

- Rehabilitation of an existing residential property

NOTE: For major or substantial rehabilitation in Normally Unacceptable zones, HUD encourages mitigation to reduce levels to acceptable compliance standards. For major rehabilitation in Unacceptable zones, HUD strongly encourages mitigation to reduce levels to acceptable compliance standards. See 24 CFR 51 Subpart B for further details.

→ Continue to Question 2.

- None of the above

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.

2. Complete the Preliminary Screening to identify potential noise generators in the vicinity (1000’ from a major road, 3000’ from a railroad, or 15 miles from an airport).

Indicate the findings of the Preliminary Screening below:

- There are no noise generators found within the threshold distances above.

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map showing the location of the project relative to any noise generators.

- Noise generators were found within the threshold distances.

→ Continue to Question 3.

3. Complete the Noise Assessment Guidelines to quantify the noise exposure. Indicate the findings of the Noise Assessment below:

Acceptable (65 decibels or less; the ceiling may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

Indicate noise level here: [Click here to enter text.](#)

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide noise analysis, including noise level and data used to complete the analysis.*

Normally Unacceptable: (Above 65 decibels but not exceeding 75 decibels; the floor may be shifted to 70 decibels in circumstances described in 24 CFR 51.105(a))

Indicate noise level here: [Click here to enter text.](#)

If project is rehabilitation:

→ *Continue to Question 4. Provide noise analysis, including noise level and data used to complete the analysis.*

If project is new construction:

Is the project in a largely undeveloped area¹?

No

Yes → ***The project requires completion of an Environmental Impact Statement (EIS) pursuant to 51.104(b)(1)(i).***

→ *Continue to Question 4. Provide noise analysis, including noise level and data used to complete the analysis.*

Unacceptable: (Above 75 decibels)

Indicate noise level here: [Click here to enter text.](#)

If project is rehabilitation:

HUD strongly encourages conversion of noise-exposed sites to land uses compatible with high noise levels. Consider converting this property to a non-residential use compatible with high noise levels.

→ *Continue to Question 4. Provide noise analysis, including noise level and data used to complete the analysis, and any other relevant information.*

If project is new construction:

The project requires completion of an Environmental Impact Statement (EIS) pursuant to 51.104(b)(1)(i). Work with HUD or the RE to either complete an EIS or obtain a waiver signed by the appropriate authority.

→ *Continue to Question 4.*

4. HUD strongly encourages mitigation be used to eliminate adverse noise impacts. Work with the RE/HUD on the development of the mitigation measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

Mitigation as follows will be implemented:

¹ A largely undeveloped area means the area within 2 miles of the project site is less than 50 percent developed with urban uses and does not have water and sewer capacity to serve the project.

Click here to enter text.

→ *Provide drawings, specifications, and other materials as needed to describe the project's noise mitigation measures.*

Continue to the Worksheet Summary.

No mitigation is necessary.

Explain why mitigation will not be made here:

Click here to enter text.

→ *Continue to the Worksheet Summary.*

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

The project will generate normal construction noise and will be temporary during construction. It is not anticipated that the project will drastically increase the noise to the area. However, if the level of noise that is created by the project exceeds the thresholds allowed by law or becomes a health hazard, steps will be taken to mitigate the noise levels.



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-1000

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Sole Source Aquifers (CEST and EA) - PARTNER

<https://www.hudexchange.info/environmental-review/sole-source-aquifers>

1. Is the project located on a sole source aquifer (SSA)¹?

- No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination, such as a map of your project or jurisdiction in relation to the nearest SSA.*
- Yes → *Continue to Question 2.*

2. Does the project consist solely of acquisition, leasing, or rehabilitation of an existing building(s)?

- Yes → *The review is in compliance with this section. Continue to the Worksheet Summary below.*
- No → *Continue to Question 3.*

3. Does your region have a memorandum of understanding (MOU) or other working agreement with EPA for HUD projects impacting a sole source aquifer?

- Contact your Field or Regional Environmental Officer or visit the HUD webpage at the link above to determine if an MOU or agreement exists in your area.
- Yes → *Continue to Question 4.*
- No → *Continue to Question 5.*

4. Does your MOU or working agreement exclude your project from further review?

- Yes → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide documentation used to make your determination and document where your project fits within the MOU or agreement.*
- No → *Continue to Question 5.*

5. Will the proposed project contaminate the aquifer and create a significant hazard to public health?

Consult with your Regional EPA Office. Your consultation request should include detailed information about your proposed project and its relationship to the aquifer and associated streamflow source area.

¹ A sole source aquifer is defined as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. This includes streamflow source areas, which are upstream areas of losing streams that flow into the recharge area.

EPA will also want to know about water, storm water and waste water at the proposed project. Follow your MOU or working agreement or contact your Regional EPA office for specific information you may need to provide. EPA may request additional information if impacts to the aquifer are questionable after this information is submitted for review.

- No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide your correspondence with the EPA and all documents used to make your determination.*
- Yes → *The RE/HUD will work with EPA to develop mitigation measures. If mitigation measures are approved, attach correspondence with EPA and include the mitigation measures in your environmental review documents and project contracts. If EPA determines that the project continues to pose a significant risk to the aquifer, federal financial assistance must be denied. Continue to Question 6.*

Worksheet Summary

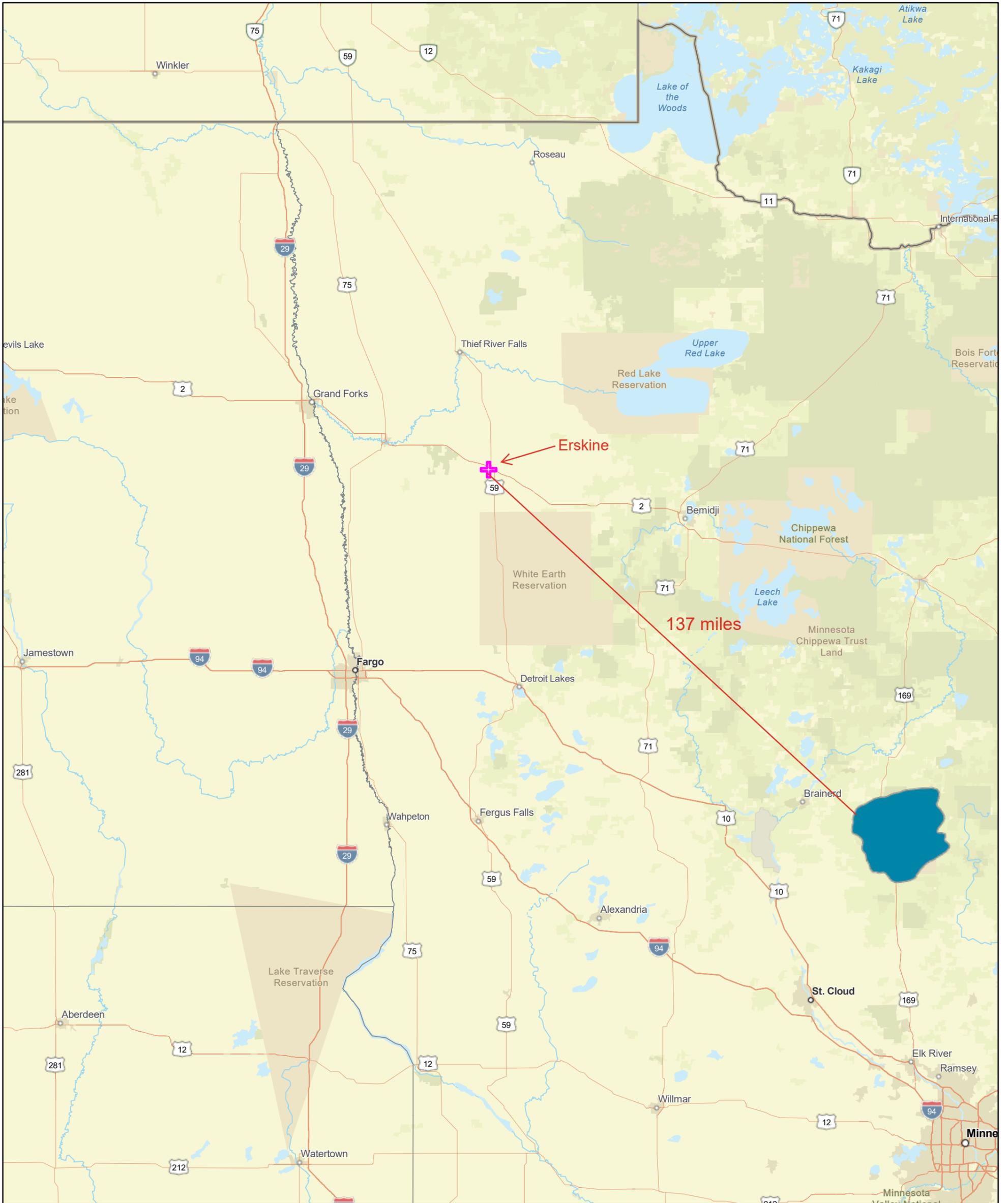
Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

There are no Sole Source Aquifers (SSA) located within the project area. The only SSA in Minnesota is located approximately 137 miles southeast of the project, near Mille Lacs Lake.

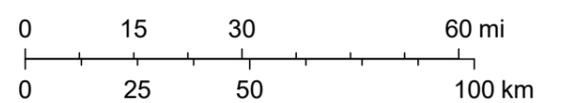
Sole Source Aquifer



January 12, 2026

-  Search Result (point)
-  Sole Source Aquifers

1:2,311,162



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-1000

This Worksheet was designed to be used by those “Partners” (including Public Housing Authorities, consultants, contractors, and nonprofits) who assist Responsible Entities and HUD in preparing environmental reviews, but legally cannot take full responsibilities for these reviews themselves. Responsible Entities and HUD should use the RE/HUD version of the Worksheet.

Wetlands (CEST and EA) – Partner

<https://www.hudexchange.info/environmental-review/wetlands-protection>

1. Does this project involve new construction as defined in Executive Order 11990, expansion of a building’s footprint, or ground disturbance?

The term "new construction" includes draining, dredging, channelizing, filling, diking, impounding, and related activities and construction of any structures or facilities.

No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.*

Yes → *Continue to Question 2.*

2. Will the new construction or other ground disturbance impact a wetland as defined in E.O. 11990?

No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide a map or any other relevant documentation to explain your determination.*

Yes → *Work with HUD or the RE to assist with the 8-Step Process.* *Continue to Question 3.*

3. Does Section 55.12 state that the 8-Step Process is not required?

No, the 8-Step Process applies.

This project will require mitigation and may require elevating structure or structures. See the link to the HUD Exchange above for information on HUD’s elevation requirements.

→ *Work with the RE/HUD to assist with the 8-Step Process. Continue to Worksheet Summary.*

5-Step Process is applicable per 55.12(a).

Provide the applicable citation at 24 CFR 55.12(a) here.

[Click here to enter text.](#)

→ *Work with the RE/HUD to assist with the 5-Step Process. This project may require mitigation or alternations. Continue to Worksheet Summary.*

8-Step Process is inapplicable per 55.12(b).

Provide the applicable citation at 24 CFR 55.12(b) here.

[Click here to enter text.](#)

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to Worksheet Summary.

8-Step Process is inapplicable per 55.12(c).

Provide the applicable citation at 24 CFR 55.12(c) here.

[Click here to enter text.](#)

→ If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to Worksheet Summary.

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

According to the U.S. Fish and Wildlife Services National Wetlands Inventory, there are no wetlands within or adjacent to the proposed project area. All work will be constructed within the water tower footprint and will occur entirely on previously disturbed land. As a result, the project is not anticipated to affect any wetlands or aquatic resources.



January 12, 2026

Wetlands

- | | | | | | |
|---|--------------------------------|---|-----------------------------------|---|----------|
|  | Estuarine and Marine Deepwater |  | Freshwater Emergent Wetland |  | Lake |
|  | Estuarine and Marine Wetland |  | Freshwater Forested/Shrub Wetland |  | Other |
|  | Freshwater Pond |  | |  | Riverine |

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.



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Wild and Scenic Rivers (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/wild-and-scenic-rivers>

1. Is your project within proximity of a Wild and Scenic River, Study River, or Nationwide Rivers Inventory River?

No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Provide documentation used to make your determination.*

Yes → *Continue to Question 2.*

2. Could the project do *any* of the following?

- Have a direct and adverse effect within Wild and Scenic River Boundaries,
- Invade the area or unreasonably diminish the river outside Wild and Scenic River Boundaries, or
- Have an adverse effect on the natural, cultural, and/or recreational values of a NRI segment.

Consult with the appropriate federal/state/local/tribal Managing Agency(s), pursuant to Section 7 of the Act, to determine if the proposed project may have an adverse effect on a Wild & Scenic River or a Study River and, if so, to determine the appropriate avoidance or mitigation measures.

Select one:

The Managing Agency has concurred that the proposed project will not alter, directly, or indirectly, any of the characteristics that qualifies or potentially qualifies the river for inclusion in the NWSRS.

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Provide documentation of the consultation (including the Managing Agency’s concurrence) and any other documentation used to make your determination.*

The Managing Agency was consulted and the proposed project may alter, directly, or indirectly, any of the characteristics that qualifies or potentially qualifies the river for inclusion in the NWSRS.

→ *The RE/HUD must work with the Managing Agency to identify mitigation measures to mitigate the impact or effect of the project on the river.*

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

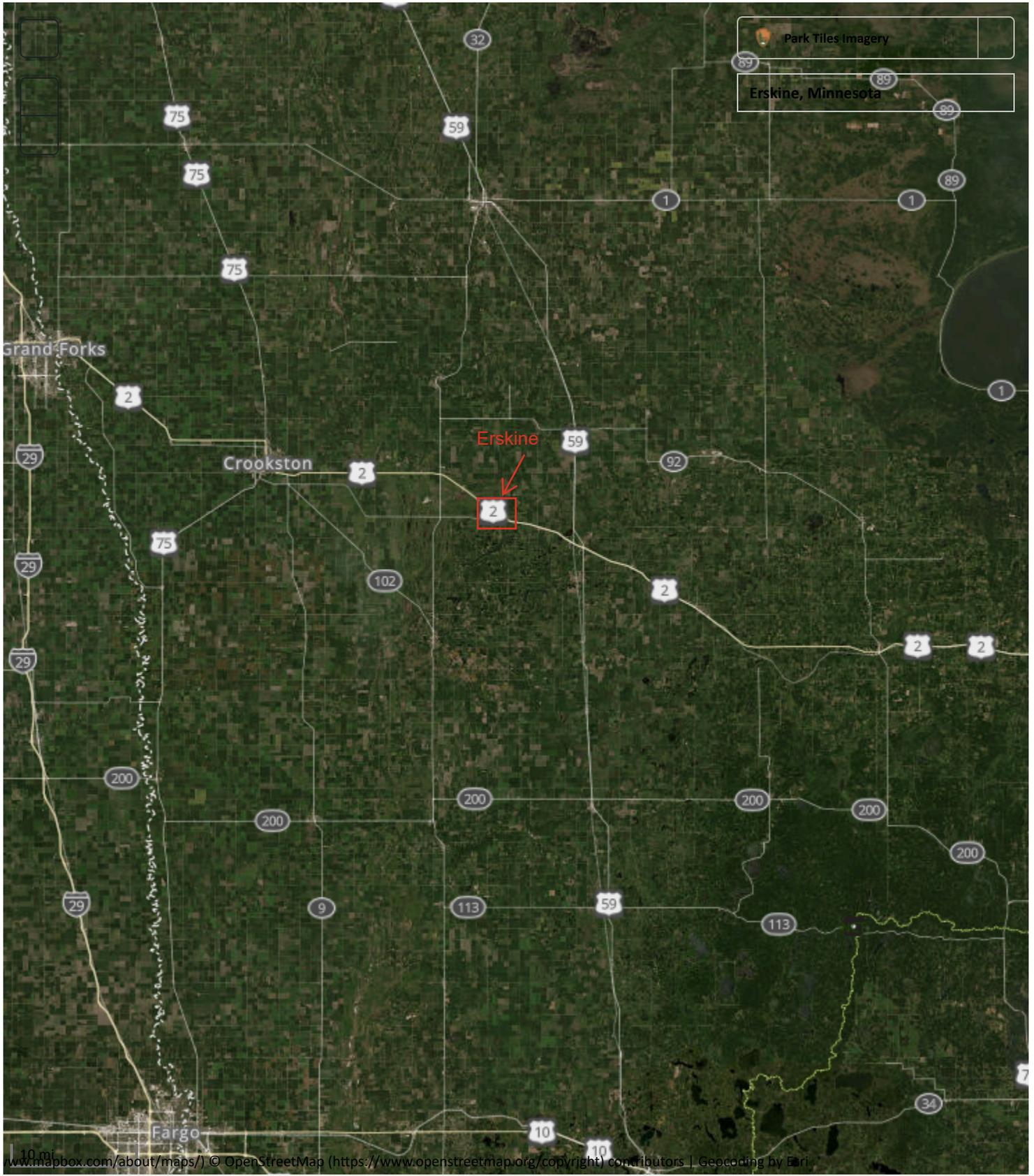
Include all documentation supporting your findings in your submission to HUD.

According to the MNDNR, the U.S. National Park Service, and the Nationwide Rivers Inventory the project area is not near any state or federally protected Wild and Scenic Rivers, study rivers, or Nationwide Rivers.

Nationwide Rivers Inventory

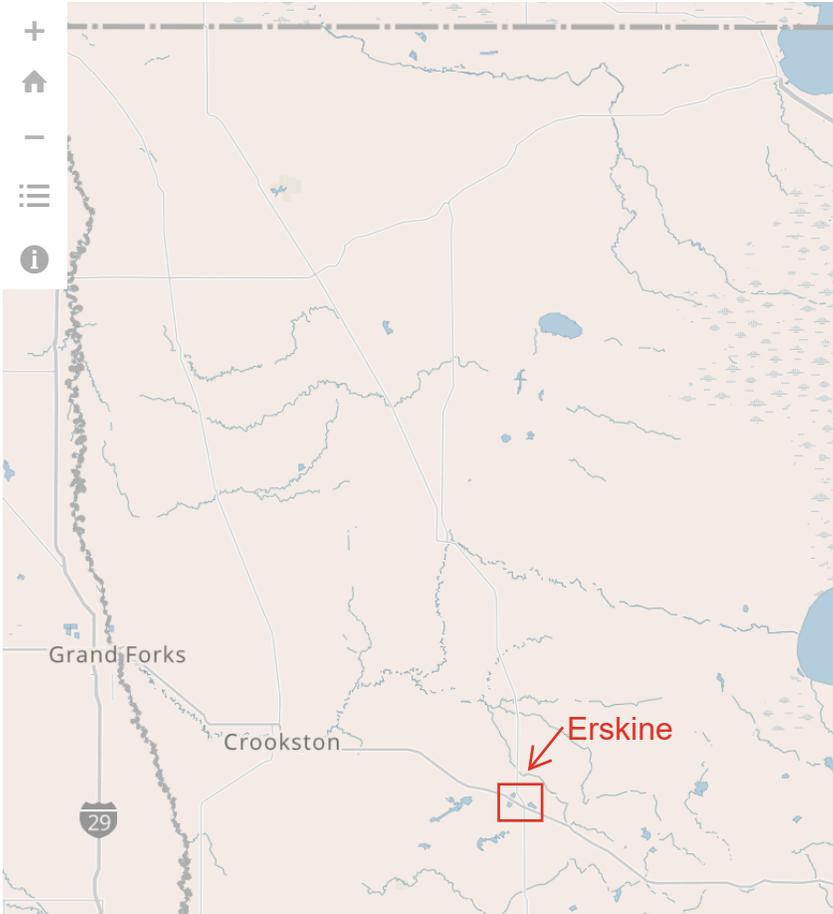
National Park Service
U.S. Department of the Interior

This is a listing of more than 3,200 free-flowing river segments in the U.S....



Wild & Scenic Rivers

Find address or place



Legend

Designated Wild and Scenic Rivers managed by other agencies



Designated Wild and Scenic Rivers where NPS has a role



Wild and Scenic-Like Rivers managed by the NPS

