



Division of Ecological & Water Resources
Region 4 (Southern Region)
21371 Highway 15 South
New Ulm, MN 56073

January 13, 2023

Faribault County Drainage Authority
c/o Merissa Lore, Drainage Manager
merissa.lore@co.faribault.mn.us

Re: Final Engineer's Report for Proposed Improvement of Faribault CD52

Dear Faribault County Drainage Authority,

Thank you for the opportunity to review the proposed improvement of Faribault County Ditch 52, and for working with the project engineer to provide modeling results as requested in the DNR PER Advisory letter. We offer the following comments following Minnesota State Statute 103E.255 on behalf of the Commissioner of the Minnesota Department of Natural Resources (DNR).

1. DNR noted several issues with the model the XP-SWIMM model used for this project. Those concerns were addressed in a separate letter *Modeling Review for Propose Improvement of Faribault CD52* dated and sent to the drainage authority on August 5, 2022. In summary, those concerns were a) the model generally is not well-adapted to representing agricultural drainage systems; b) this model application appears to have several issues; and c) the model analyzes the constructed or improved conditions versus the proposed conditions and does not analyze the system in its dilapidated/disrepaired state.
2. Although not required, if the drainage authority requests additional modeling work by the engineer to better estimate potential impacts related to outlet adequacy or downstream impacts, DNR staff may be available to provide a technical review of the model results.
3. The FER mentions several storage possibilities, including wetland restoration potential in Section 30 of Blue Earth City Township. This specific location is already in an easement and the details of current vs proposed additional mitigation are not clear. The drainage authority is encouraged to adopt additional BMPs to mitigate improvement impacts, these include practices detailed in [Chapter 5 of the MN Public Drainage Manual](#).

We can be available to discuss these high-level comments or the detailed modeling review comments. Please continue to route contact requests through region4drainage.dnr@state.mn.us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Todd Kolander'.

Todd Kolander
DNR Southern Region, EWR North District Manager

cc: Katie Wigen, DNR Area Hydrologist
Tim Gieseke, Korey Woodley, DNR EWR Regional Management
Joseph Lewis, Houston Engineering