

To: Goodhue County Board of Commissioners
From: Megan Smith, Land Use Management Director
Mtg. Date: October 6, 2026
Memo Date: September 30, 2026
Re: Pelican Point Environmental Assessment Worksheet (EAW) Determination

AGENDA ITEM:

The Goodhue County Board will review and consider the EAW for Pelican Point, which is being described as a redevelopment project that includes a marina, resort with camping, bar and restaurant, and accessory marine support services such as fueling, marine repairs, and off-season storage. The Board is encouraged to consider public input, review comments submitted on the EAW and determine if an environmental impact statement (EIS) is needed for the project.

The project is located just north of Lake City, in Florence Township, at 35853 Highway 61 North, Lake City, MN.

The full 187-page document is available upon request with Goodhue County, has been published in the EQB Monitor, and is available on the Goodhue Co Website. It is incorporated by reference to this staff memo and will be part of the county record.

ATTACHMENTS:

- 1) Link to EAW https://goodhuecountymn.gov/government/public_notices/
- 2) MPCA Comments
- 3) MnDNR Comments
- 4) MnDOT Comments
- 5) Florence Township Comments
- 6) Responses to MPCA, MnDNR, and Florence Twp Comments

LEGAL NOTICE:

Goodhue County is acting as the responsible government unit (RGU) for oversight and responsibility of reviewing an environmental assessment worksheet (EAW) for the proposed redevelopment of Pelican Point in Florence Township. The project is located at 35853 Highway 61 North, Lake City, MN, on tax parcel 32.0132.2100. The Pelican Point property has historically been known as Hanson's Harbor and is used as a marina, harbor, office, indoor/outdoor boat storage, boat repair, and a mobile home park. The proposed project is to redevelop the existing property into a campground with 69 campsites, bar/off-sale, and recreational area, while

continuing the marina and boat repair services, and increasing boat slips from 190 to 220. The project also includes a proposed bank stabilization project, fill, grading, and new septic systems.

Goodhue Co is accepting public comments on the project until 8am on October 6, 2026. Comments can be submitted in writing to Goodhue County Land Use, 509 West 5th Street, Red Wing, MN 55066 or submitted through email to megan.smith@goodhuecountymn.gov. Comments on the following topics are considered to be aligned with the goals of the state rules on environmental reviews: the accuracy and completeness of the information, potential impacts that may warrant further investigation, and the need for an EIS on the project.

The EAW is available on the Goodhue County website at <https://goodhuecountymn.gov/> and has been published in the EQB Monitor which is published by the Minnesota Pollution Control Agency. Hard copies of the plan are available upon request.

Please direct questions to Goodhue County Land Use located at 509 West 5th Street, Red Wing, MN 55066 and at 651-385-3104.

LEGAL RESPONSIBILITY AND AUTHORITY:

The purpose of the plan is to guide permitting decisions, inform the public, and identify environmental impacts. Mn Rules 4410.1700 state that an EIS shall be ordered for projects that have the potential for significant environmental effects. This project meets one of the mandatory criteria for an EAW because of the construction of 25 or more units or sites in a sensitive shoreland area.

Before making a final determination, the Board shall consider the following:

1. Type, extent, and reversibility of environmental effects;
2. Cumulative potential effects;
3. The extent to which environmental effects are subject to mitigation by ongoing public regulatory authority provided that the RGU may rely only on mitigation measures that are specific and can reasonably be expected to be effective; and
4. The extent to which environmental effects can be anticipated and controlled as a result of other available environmental studies undertaken by public agencies or the project proposer, including other environmental impact statements.

EIS DECISION MAKING:

Goodhue County must decide on the need for an EIS no later than 30 days after the comment period ends. The comment period ends Oct 6th, so any comments received up until that date

must be reviewed, considered, and responded to. As of September 30th, 2026, staff has received comments from three state agencies, and Florence Township. Substantial comments must be responded to by the RGU, which is Goodhue Co. Other informal reviews have occurred with the Goodhue Co Soil and Water Conservation District who provided relevant information to staff about wetlands and other site history. Goodhue County Environmental Health staff who provide background on the site history with wells and septic systems.

County Staff is providing the following guidance to the County Board related to the EAW, supporting the finding that an EIS is not required.

1. No rare features or species have been identified as being adversely impacted by the project but have been documented to exist within the vicinity of the project, and will be appropriately protected and monitored in accordance with DNR requirements.
2. No permanent structures are proposed.
3. No major excavation work is proposed on the site; fill is part of the project plans in order to elevate significant portions of the site above the base flood elevation of Lake Pepin/Mississippi River in this area.
4. Risks and impacts associated with each use, including the resort/campground, the restaurant/bar/tiki bar, the Marina, and the Boat service area were listed and analyzed. These impacts can be mitigated and regulated through zoning and building regulations.
5. The project proposes the site will change from having 2.4 acres of impervious area, to 3.1 acres of impervious area. Since it is less than 1 new acre of impervious, no on-site stormwater pond, or stormwater retention or detention facility is required.
6. A total of 42 trees have been removed from the site, including Boxelder, Silver Maple, Ash, and Elm, which were removed from the site, with most to be considered undesirable trees. 50 new trees are proposed to be planted that will be suitable for the soil and site location.
7. The County recognizes that precipitation from rain events and snow melt may contribute to greater surface runoff, shoreline erosion, and sediment transport during major events. Appropriate stormwater management efforts, erosion control BMP's, and features of the site design are expected to minimize long-term climate-related impacts to the project.

8. The marina will operate with above ground marine fuel storage tanks and associated dispensing equipment. All will be operated in accordance with applicable Mn Pollution Control Agency requirements.
9. A marine vessel pump out station with associated septic holding tank infrastructure will be provided, allowing for sanitary waste dispose for recreational boaters, further supporting environmental protection of Lake Pepin. It is not known how pump outs occurred under prior ownership of the site
10. The project site has been previously developed and contains approximately 6 to 10 feet of sandy fill above the natural grade. NRCS mapping indicates no restrictive soil features within 80 inches of the surface for the mapped soil units.
11. No mining, bedrock excavation, or substantial alteration of underlying geologic formations are proposed. Significant impacts to bedrock or susceptible geological formations, such as karst, are not anticipated.
12. Approximately 8.77 acres of the site will be disturbed during construction.
13. The grading plan identifies approximately 25,883 cubic yards of fill associated with the primary resort/campground area. The reason for the fill is to elevate much of the site above the base flood elevation.
14. Wastewater from the proposed campground will be treated through multiple Type III mound systems, with each individual system designed for a flow of less than 2,500 gallons per day. Holding tanks may also be utilized in limited areas of the campground where adequate area for soil treatment is not available. Total wastewater discharged to soil treatment areas will be less than 10,000 gallons per day.
15. Final system locations, design flows, sizing, and configuration will be established through the SSTS design and permitting process in accordance with applicable state and local requirements.
16. A SWPPP, or stormwater pollution prevention plan has been prepared specifically for this project and will need to be adhered to during construction.

17. The project will utilize two existing wells for domestic water supply.
18. The project will need to complete formal SHPO review and applicable OSA/MIAC consultation to determine whether additional archaeological protection measures are warranted.
19. State agency comments submitted by the MPCA, MnDNR, and MnDOT have been appropriately addressed and any concerns identified will be addressed through applicable permitting processes.
20. Florence Township has raised concerns related to zoning and natural resource protection regulations for the site, related to topics such as total impervious area, the size of recreational vehicles, and parking capacity. These concerns should be regulated through established processes outlined in the zoning authority that lies with both Goodhue County and Florence Township. Upon completion of the EAW, the township has the ability to consider local land use permits for the project.
21. The cumulative potential effects of the project have been appropriately identified by the EAW, and the redevelopment has been found to have a minimal cumulative impact to the environment.
22. Environmental impacts are subject to mitigation by ongoing public regulatory authority provided that Goodhue County, may rely only on mitigation measures that are specific and can reasonably be expected to be effective.
23. The extent to which environmental effects can be anticipated and controlled as a result of other available environmental studies undertaken by public agencies or the project proposer, including other environmental impact statements.

CONCLUSION:

Based on the review of comments, testimony, and the findings stated herein, the Goodhue co Board finds the EAW for Pelican Point sufficient, and finds no need for an Environmental Impact Statement.

September 15, 2026

VIA EMAIL

Megan Smith
Goodhue County
509 West 5th Street
Red Wing, MN 55066

RE: Pelican Point - Environmental Assessment Worksheet

Dear Megan Smith:

Thank you for the opportunity to review and comment on the Environmental Assessment Worksheet (EAW) for the Pelican Point project (Project) located in Goodhue County, Minnesota. The Pelican Point property has historically been known as Hanson's Harbor and has been used as a marina, harbor, office, indoor/outdoor boat storage, boat repair, and a mobile home park. The proposed project is to redevelop the existing property into a high-end campground, bar/off-sale, and recreational area while continuing the marina and boat repair services. Regarding matters for which the Minnesota Pollution Control Agency (MPCA) has regulatory responsibility and other interests, the MPCA staff has the following comments for your consideration.

Wastewater:

- Section 12, b. Wastewater, should itemize all the various types of existing and proposed units that will generate sewage, including camp sites, restrooms/showers, laundry, bar, boat pump-out, repair shop, etc.
The different types of units should be listed and include the design flow per unit and the total design flow per type in accordance with Minn. R. 7081.0130.
- The plan sheet in the EAW lists 69 camp sites, 27 park models, and 42 campers. The EAW should also describe what the different types of sites are.
- Minn. R. 7081.0040 requires that systems with a design flow greater than 10,000 gallons per day require a state disposal system permit from the MPCA.

We appreciate the opportunity to review this Project. Please be aware that this letter does not constitute approval by the MPCA of any or all elements of the Project for the purpose of pending or future permit actions by the MPCA. Ultimately, it is the responsibility of the Project proposer to secure any required permits and to comply with any requisite permit conditions.

Megan Smith
Page 2
September 15, 2026

If you have any questions concerning our review of this EAW, please contact me by email at chris.green@state.mn.us or by telephone at 507-476-4258.

Sincerely,

Chris Green

This document has been electronically signed.

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

CG:kj

cc: Julie Henderson, MPCA
David Sahli, MPCA
Melinda Neville, MPCA
Andri Dahlmeier, MPCA
Nicole Peterson, MPCA
Lauren Dickerson, MPCA
Deepa deAlwis, MPCA
Steve Schmidt, MPCA

From: [Collins, Melissa \(DNR\)](#)
To: [Smith, Megan](#)
Cc: [Youngsma, Lucas \(DNR\)](#); chrisp@ggg.to
Subject: Pelican Point EAW - DNR Comments
Date: Thursday, September 24, 2026 6:02:21 PM
Attachments: [Outlook-Title_Min.png](#)
[Outlook-Facebook_L.png](#)
[Outlook-Twitter_lo.png](#)
[Outlook-Email Subs.png](#)

You don't often get email from melissa.collins@state.mn.us. [Learn why this is important](#)

External Email - Use caution opening links or attachments!

Dear Megan Smith,

Thank you for the opportunity to review the Pelican Point EAW for the project located in Goodhue County. DNR appreciates the coordination that has occurred during project development and generally approves of the project that will recover previously lost shoreline for Lake Pepin. We respectfully submit the following comment for your consideration:

1. Section 14.d., Rare Features. We recommend that native seed mixes be incorporated into project landscaping as much as possible to reduce the spread of non-native species to natural areas.
2. Section 17, Visual. Because the project area is within an Important Bird Area and significant migratory corridor, we recommend that warm (low color temperature) lighting be used in addition to downward cast lighting, and that motion-sensors be used to reduce impacts to wildlife.

Please let me know if you have any questions.

Thank you,

Melissa Collins

Regional Environmental Assessment Ecologist | Ecological and Water Resources

Pronouns: She/her/hers

Minnesota Department of Natural Resources

1200 Warner Road

St. Paul, MN 55106

Phone: 651-259-5755

Email: melissa.collins@state.mn.us

mndnr.gov



From: [Karsner, Jennifer C \(She/They\) \(DOT\)](#)
To: [Wayne, Kurt \(He/Him/His\) \(DOT\)](#); [Smith, Megan; "grantg@ggg.to"](#)
Cc: [D6.Development Review](#)
Subject: RE: Pelican Point Campground and Marina, Goodhue Co
Date: Thursday, September 24, 2026 9:08:50 AM
Attachments: [image002.png](#)
[image003.png](#)

You don't often get email from jennifer.karsner@state.mn.us. [Learn why this is important](#)

External Email - Use caution opening links or attachments!

Good morning, Megan!

Our team has reviewed the Pelican Point project and MnDOT has no MnDOT-specific requirements or requests for this project. The only comment the team had is to make sure to conduct the proper review and get the proper permits from the Army Corps of Engineers, FEMA, DNR, and MPCA due to the proximity to the Mississippi River and the potential for fill or draining to enter this navigable water.

Thank you,

Jennifer Karsner (*she/they*)

Senior Transportation Planner | MnDOT District 6

2900 48th Street NW | Rochester, MN 55901

jennifer.karsner@state.mn.us | 507-286-7681



From: Wayne, Kurt (He/Him/His) (DOT) <kurt.wayne@state.mn.us>
Sent: Tuesday, September 22, 2026 8:54 AM
To: Karsner, Jennifer C (She/They) (DOT) <Jennifer.Karsner@state.mn.us>;
megan.smith@goodhuecountymn.gov
Cc: D6.Development Review <d6.developmentreview@state.mn.us>
Subject: FW: Pelican Point Campground and Marina, Goodhue Co

Hi Megan.

This development looks familiar – I believe our review team has looked at the civil plans for this recently. I'm sharing your attachment with Jennifer as she's the one that led our recent review on this. I want to make sure this is the same info we've already seen.

Last I spoke with Jennifer, we likely have a comment or two on this project, but nothing major. You and the applicant should be receiving those this week.

Thanks.

Kurt Wayne (he/him)

Planning Director | MnDOT District 6

2900 48th Street NW | Rochester, MN 55901

kurt.wayne@state.mn.us | 507-273-7052



From: Smith, Megan <megan.smith@goodhuecountymn.gov>

Sent: Monday, September 21, 2026 4:52 PM

To: Wayne, Kurt (He/Him/His) (DOT) <kurt.wayne@state.mn.us>

Subject: Pelican Point Campground and Marina, Goodhue Co

This message may be from an external email source.

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Hi Kurt,

Goodhue County has received a conditional use permit request for the redevelopment of Hansen's Harbor north of Lake City, in Florence Twp. The project is going to be considered at the Sept 28th Planning Advisory Commission meeting. An EAW is currently under review as well for the project. The site is currently operating as a Marina, and a request is under review for a 69 campsite seasonal campground.

Here's the link to the full submittal that is part of the PAC packet. They also have a traffic memo that I attached.

[Agenda - Planning Advisory Commission Meeting - 9/28/2026 - Goodhue County, MN](#)

I'm wanting to make sure MnDOT has had a chance to review this plan and weigh in with any concerns or recommendations.



Megan Smith | Land Use Management Director

Land Use Management | 509 W. 5th Street Red Wing, MN 55066

P: 651-385-3103 | **F:** 651-267-4872 | **E:**

megan.smith@goodhuecountymn.gov

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FLORENCE TOWNSHIP

Planning Commission

September 22, 2026

Megan Smith
Land Use Management Director
Goodhue County
509 W. 5th Street
Red Wing, MN 55066

RE: Florence Township Comments on the Pelican Point Environmental Assessment Worksheet

Dear Ms. Smith:

Florence Township Planning Commission submits the following comments for Goodhue County's consideration as Responsible Governmental Unit for the August 2026 Pelican Point Environmental Assessment Worksheet (EAW). The Township's comments focus on the accuracy and completeness of the project record, unresolved information that may affect the County's environmental review decision, and mitigation measures that should be clearly identified for later incorporation into applicable permits and the Township conditional use permit (CUP). These comments are not intended as a final Township decision on the CUP or as a separate determination that an Environmental Impact Statement is required.

1. Project Description and Pending Park Model Issue

The environmental review should be based on a project description that matches the development the applicant can lawfully pursue. The EAW describes a 69-site seasonal RV/campground project, while the supporting development materials include 27 larger "park model" sites that are the subject of a separate pending variance request. The Township's current zoning review has identified substantial concerns with treating those larger units as ordinance-defined recreational vehicles.

Before the County makes its final EAW/EIS determination, the Township requests that the applicant clearly state whether the 27 park model sites remain part of the proposed project. If the project is revised to use ordinance-compliant RVs, or if the site plan otherwise changes, the EAW should be updated as necessary so the project description, site layout, occupancy assumptions, wastewater demand, traffic generation, floodplain analysis, and other affected items remain internally consistent. The Township does not recommend treating the unresolved variance as a procedural deadlock; rather, the environmental record should accurately reflect the project that will proceed.

2. Traffic and Highway 61 Access

The EAW contains a material traffic inconsistency that should be corrected. Item 20 and the traffic memorandum identify approximately 892 daily trips, 81 weekday PM peak-hour trips, and 88 Saturday peak-hour trips, while the cumulative-effects discussion uses substantially lower daily and peak-hour figures. The EAW should use one consistent set of traffic assumptions and explain the basis for those assumptions.

The Township also requests additional consideration of seasonal recreational traffic at the U.S. Highway 61/frontage-road access. The analysis should address representative summer weekend conditions and the operational characteristics of vehicles towing RVs and boats/trailers, including their greater length, slower acceleration, longer deceleration, and turning movements. The record should document MnDOT review of the access and identify any right-of-way, access, or other MnDOT approvals that will be required. If a full traffic impact study is not warranted, the EAW should explain why the available

analysis is sufficient and identify any traffic monitoring or mitigation that may appropriately be carried into the CUP.

3. Floodplain and Site Grading

Approximately 8.77 acres are proposed to be disturbed, with substantial fill used to raise portions of the site. The Township requests final floodplain documentation that clearly identifies the floodway and flood-fringe boundaries, applicable regulatory flood protection elevation, proposed fill elevations, campground-site elevations, and the relationship of structures, utilities, fuel facilities, holding tanks, and access routes to mapped flood-prone areas. The County should also document that the proposed grading and fill will not adversely affect flood conveyance or create off-site impacts.

4. Stormwater Runoff and Permanent Management

The EAW recognizes increasing rainfall intensity, a net increase in impervious surface, and direct drainage toward Lake Pepin. The Township requests a project-specific stormwater runoff and management plan that goes beyond construction-phase erosion control and clearly identifies post-construction drainage areas, discharge points, infiltration or treatment practices, stabilization measures, maintenance responsibilities, and how the system will perform during significant rainfall events. Even if the MPCA construction permit does not independently trigger a permanent treatment facility, the EAW should clearly describe the permanent measures relied upon to protect Lake Pepin.

5. Wastewater, Septic Systems, and Water Use

The EAW describes multiple Type III mound systems, holding tanks for several facilities, and continued use of existing wells, but final design details remain to be established. The Township requests final or substantially complete wastewater information showing design flows, expected water use, system and reserve-area locations, holding-tank sizing, anticipated pumping frequency, seasonal operating procedures, winterization, monitoring and maintenance responsibilities, and proof of review/certification by the applicable SSTS authority. The water-use estimate should also be reconciled with the project's well capacity and any DNR water-appropriation threshold that may apply.

6. Hazardous Materials, Fueling, and Spill/Flood Response

Because the project includes marina fueling, boat maintenance, petroleum products, wastewater holding tanks, permeable soils, and flood-prone areas near Lake Pepin, the Township requests a documented spill-prevention, containment, and flood-response plan. The plan should address the new fuel tanks and dispensing area, storage of oils and maintenance products, tank and equipment protection during high-water events, response to a release, emergency contacts, and procedures for any contaminated soil or groundwater encountered during construction.

7. Aquatic Species, Shoreline Work, and DNR Review

The DNR Natural Heritage review identifies protected aquatic species in the vicinity and calls for additional evaluation associated with shoreline and riverbed disturbance. The Township requests completion and documentation of the DNR aquatic-species requirements before the County closes the environmental review record, including any required mussel habitat evaluation or survey, applicable avoidance measures, seasonal restrictions, and permits or authorizations for shoreline work. The final shoreline restoration/stabilization plan and DNR permit status should be included or clearly incorporated by reference.

8. Historic and Archaeological Resources

The EAW states that SHPO review was pending and identifies archaeological sensitivity in the vicinity, including a burial-mound site. The Township requests completion or documented closure of the SHPO/Office of the State Archaeologist/Minnesota Indian Affairs Council review process and any archaeological investigation determined necessary before substantial grading. Any resulting avoidance, monitoring, or construction-stop procedures should be incorporated into the project record.

9. Landscape, Restoration, Noise, Lighting, and Ongoing Maintenance

The EAW relies on future vegetation, landscaping, stabilization, screening, lighting controls, and operational practices to mitigate several impacts. The Township requests a consolidated landscape and restoration plan identifying revegetation areas; proposed tree and plant species, including the “desirable trees” referenced in the EAW; canopy restoration; shoreline and erosion-control planting; stormwater filtration areas; visual screening; wildlife-habitat restoration where applicable; dust-management measures; and ongoing maintenance responsibilities. The plan should also address shielded/downward lighting and the relationship of landscaping and site design to noise attenuation.

Operational mitigation identified in the EAW – particularly hours of operation, outdoor amplified sound, quiet hours, lighting, stormwater maintenance, wastewater management, shoreline protection, and emergency/flood procedures – should be stated with enough specificity that the Township can incorporate appropriate measures as enforceable CUP conditions.

Requested County Response

Florence Township respectfully requests that Goodhue County address the items above before making its final EAW/EIS determination, either through corrections to the EAW, supplemental information from the applicant, written agency responses, or other documentation the County determines appropriate. The Township also requests copies of substantive supplemental materials and agency determinations so the Planning Commission can rely on the completed environmental record when the Pelican Point CUP returns for consideration.

Thank you for considering the Township’s comments and for coordinating with Florence Township as the environmental review proceeds.

Sincerely,

Mike Pfeiffer

Zoning Administrator

Florence Township

On behalf of the Florence Township Planning Commission



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September 21, 2026

VIA EMAIL

Megan Smith
Goodhue County
509 West 5th Street
Red Wing, MN 55066

Re: Pelican Point - EAW - MPCA letter dated 09/15/2026 from Chris Green

Dear Megan Smith,

In response to the Minnesota Pollution Control Agency's September 15, 2026 comment letter regarding wastewater flows for the Pelican Point Environmental Assessment Worksheet, we have itemized the project's sewage-generating uses and calculated design flows in accordance with Minn. R. 7081.0130. The attached flow summaries distinguish wastewater directed to on-site soil dispersal systems from wastewater retained in holding tanks for off-site disposal.

The proposed campground contains 69 seasonal campsites, all with individual sewer hookups. The site plan identifies 27 spaces as park-model sites and 42 spaces as camper sites. The park-model designation identifies larger campsite spaces intended to accommodate larger seasonal camper units; it does not represent permanent mobile homes or permanent residential dwelling units. Because all 69 spaces will operate as seasonal campground sites with sewer hookups, each site was calculated at 100 gallons per day under Minn. R. 7081.0130, subpart 1, Table I.

The calculated design flow directed to the five proposed soil dispersal systems is 8,138 gallons per day. This total includes 6,900 gallons per day from the 69 campground sites, 810 gallons per day from the boat-maintenance building, 30 gallons per day for two boat-maintenance employees, and 398 gallons per day for infiltration and inflow under Minn. R. 7081.0140. The individual soil treatment systems have calculated design flows ranging from 1,492 to 1,809 gallons per day.

The soil dispersal systems will be under common ownership and located within one-half mile of one another. Their combined calculated flow of 8,138 gallons per day was therefore used to evaluate the state disposal system permit threshold in Minn. R. 7081.0040. Because the combined flow received by the soil dispersal areas is less than 10,000 gallons per day, an MPCA state disposal system permit is not anticipated based on the currently proposed design.

An additional 5,100 gallons per day of calculated design flow will be directed to holding tanks and will not be discharged to an on-site soil dispersal area. This total includes wastewater from the existing seasonal marina shower house, proposed seasonal tiki bar, proposed bar/grill,

September 21, 2026

campground office, and marina boat pump-out service. The boat pump-out service was estimated at four pump-out events per day and 50 gallons per event using the closest applicable Table I flow as a conservative proxy for this use, which is not specifically listed in Minn. R. 7081.0130. No separate campground laundry facility or central dump station is proposed.

The combined calculated design sewage generation for the project is 13,238 gallons per day, consisting of 8,138 gallons per day directed to soil dispersal systems and 5,100 gallons per day retained in holding tanks. Holding-tank wastewater will be pumped by a licensed service provider and transported to an approved disposal facility. Final system designs, holding-tank capacities, operating requirements, and local permits will be completed through Goodhue County in accordance with applicable requirements.

The attached Soil Treatment Area Flow Summary and Holding Tank Flow Summary provide the requested unit counts, design-flow rates, calculations, and allocation of wastewater among the proposed systems. Please contact my office if additional information or clarification is needed.

Sincerely,

Chris Priebe

Chris Priebe,
Senior Vice President

PELICAN POINT SSTS Flow Summary for SDS Permitting and Design					
Wastewater Source Sub. 1A	7081.0130	Wastewater Flow Unit	Total Number of Units	Flow per Unit (gpd)	Total Flow (gpd)
Overall SSTS Flow Summary of Wastewater Discharging to a Soil Dispersal Area					
Campsite With Sewer Hookup		Each	69	100	6,900
Service Station (Boat Maint.)	3,240 sqft x 0.25 gpd/sqft				810
Employee		Each	2	15	30
7081.0140 Infiltration	2,625' - 4" PVC = (2625 x 4 x 200) / 5280				398
Total Soil Treatment Area Wastewater Flows 7081.0130					8,138
We are proposing 5 separate soil treatment systems. Below is a breakdown of calculated flows to individual soil treatment areas.					
Proposed System 1 - Individual Subsurface Sewage Treatment System					
Campsite With Sewer Hookup		Each	14	100	1,400
7081.0140 Infiltration	608' - 4" PVC = (608 x 4 x 200) / 5280				92
System 1 Total (gpd):					1,492
Proposed System 2 - Individual Subsurface Sewage Treatment System					
Campsite With Sewer Hookup		Each	14	100	1,400
7081.0140 Infiltration	654' - 4" PVC = (654 x 4 x 200) / 5280				99
System 2 Total (gpd):					1,499
Proposed System 3 - Individual Subsurface Sewage Treatment System					
Campsite With Sewer Hookup		Each	17	100	1,700
7081.0140 Infiltration	367' - 4" PVC = (367 x 4 x 200) / 5280				56
System 3 Total (gpd):					1,756
Proposed System 4 - Individual Subsurface Sewage Treatment System					
Campsite With Sewer Hookup		Each	17	100	1,700
7081.0140 Infiltration	716' - 4" PVC = (716 x 4 x 200) / 5280				109
System 4 Total (gpd):					1,809
Proposed System 5 - Individual Subsurface Sewage Treatment System					
Campsite With Sewer Hookup		Each	7	100	700
Service Station (Boat Maint.)	3,240 sqft x 0.25 gpd/sqft				810
Employee		Each	2	15	30
7081.0140 Infiltration	280' - 4" PVC = (280 x 4 x 200) / 5280				42
System 5 Total (gpd):					1,582
Total Daily Calculated Flows SSTS SYSTEMS (gpd):					8,138

PELICAN POINT Holding Tank Flow Summary					
Wastewater Directed to Holding Tanks					
Wastewater Source Sub. 1A	7081.0130	Wastewater Flow Unit	Total Number of Units	Flow per Unit (gpd)	Total Flow (gpd)
Existing Seasonal Marina Shower House Holding Tank - 7081.0130 Table I (8) Misc.					
(a) public lavatory		User	50	5	250
(b) public shower		Shower Taken	30	11	330
Existing Marina Shower House Calculated daily flow (gpd)					580
Proposed Seasonal Tiki Bar Holding Tank - 7081.0130 Table I (3) eating & drinking estab.					
(j) bar/lounge no meals		seat	15	36	540
Employee		Each	2	15	30
Proposed Seasonal Tiki Bar Calculated daily flow (gpd)					570
Proposed Bar/Grill and office Holding Tank - 7081.0130 Table I (3) eating & drinking estab.					
(a) seat open 16hr or less		seat	120	30	3,600
Employee		Each	10	15	150
Proposed Bar/Grill and office Calculated daily flow (gpd)					3,750
Proposed Boat Pumpout Wastewater - Limited service not specifically listed in 7081.0130					
Boat Pumpout Service*		event	4	50	200
*Utilized 7081.0130 Table 1 (5)(a) campsite without sewer hookup with central or shower facility as it is the closest relevant item to the boat pumpout.					
Proposed Boat Pumpout Calculated daily flow (gpd)					200
Total Daily Calculated Flows HOLDING TANKS (gpd):					
					5,100



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September 28, 2026

VIA EMAIL

Megan Smith
Goodhue County
509 West 5th Street
Red Wing, MN 55066

Re: Pelican Point - EAW - DNR Email dated 09/24/2026 from Melissa Collins

Dear Megan Smith,

In response to the Minnesota Department of Natural Resources comments dated September 24, 2026, the project proposer provides the following commitments:

1. Native seed mixes will be incorporated into project landscaping and restoration areas where applicable. The use of native vegetation will help stabilize disturbed soils, provide wildlife habitat, and reduce the potential spread of non-native species into nearby natural areas.
2. The project lighting plan has been developed to minimize disturbance to wildlife within the Important Bird Area and migratory corridor. Exterior lighting will use warm, low-color-temperature fixtures where practicable and will be directed downward and shielded to reduce glare and light trespass. Motion sensors, timers, or similar controls will be used where appropriate to limit unnecessary nighttime lighting.

These commitments will be incorporated into the project design and implemented during construction and operation of the Pelican Point development. Please let me know if additional information or clarification is needed.

Sincerely,

Chris Priebe

Chris Priebe,
Senior Vice President

September 28, 2026

VIA EMAIL

Megan Smith
Goodhue County
509 West 5th Street
Red Wing, MN 55066

Re: Pelican Point - EAW – Florence Township Letter Dated 09/22/2026 from Mike Pfeiffer

Dear Megan Smith,

In response to the Florence Township comments dated September 22, 2026, the project proposer provides the following commitments:

1. The proposed project continues to include 69 seasonal campground sites. Of these, 27 sites are identified on the site plan as “park model” sites because they are larger spaces intended to accommodate larger recreational vehicles or provide a more spacious and higher-amenity campsite. The designation does not represent permanent mobile homes, permanent residences, or a separate land-use classification. All 69 sites will be operated as seasonal campground sites.

The previously submitted variance request related to the size of recreational vehicles located within the floodplain. The project has been clarified so that recreational vehicles will not be located within the floodplain; therefore, the variance request has been withdrawn.

The withdrawal of the variance does not change the proposed number of campsites or the seasonal campground use evaluated in the EAW. Because all 69 sites remain seasonal campsites, the clarification does not change the wastewater design flows, traffic-generation assumptions, occupancy assumptions, or other environmental calculations based on the proposed 69-site campground.

2. The traffic figures in the cumulative-effects discussion were based on preliminary estimates available while the EAW was being prepared. The traffic memorandum was completed after that portion of the EAW had been drafted and contains the final project traffic estimates. The traffic memorandum and Item 20 therefore contain the controlling figures: approximately 892 average daily trips, 81 weekday PM peak-hour trips, and 88 Saturday peak-hour trips. The cumulative-effects discussion should be corrected or clarified to incorporate these final figures.

The traffic memorandum evaluates the proposed project at full buildout and includes both weekday PM and Saturday peak-hour conditions. The Saturday analysis is intended to represent the project's higher seasonal recreational use, including traffic associated with the campground, marina, bar and grill, and other proposed uses. Recreational vehicles and vehicles towing boats or trailers may have slower acceleration, longer deceleration distances, greater vehicle lengths, and wider turning movements than passenger vehicles. The project access and internal circulation will be maintained to accommodate the recreational vehicles, boat trailers, service vehicles, and emergency vehicles expected to use the site.

The project information and traffic analysis were submitted to MnDOT District 6 for review. Jennifer Karsner, Senior Transportation Planner for MnDOT District 6, provided the following response: "Our team has reviewed the Pelican Point project and MnDOT has no MnDOT-specific requirements or requests for this project." Based on MnDOT's review, no additional MnDOT right-of-way, access, or traffic-related approvals have been identified for the proposed project.

A separate full traffic impact study is not considered necessary because the completed traffic memorandum evaluates the proposed uses at full buildout, includes weekday and Saturday peak-hour conditions, and was reviewed by MnDOT without additional requirements or requests. No project-specific traffic mitigation was identified as necessary through MnDOT's review. If the site plan or intensity of use changes materially, or if operational traffic concerns are identified after development, the applicant will coordinate with Goodhue County, Florence Township, and MnDOT, as applicable, regarding appropriate access or operational measures.

3. A general grading plan was submitted with the EAW to show the proposed grading concept and anticipated extent of site disturbance. Final grading plans will be submitted to the applicable agencies for review and approval.

As part of the final review and approval process, the regulatory floodway and flood-fringe boundaries, applicable flood protection elevations, proposed fill and campground-site elevations, and the locations of structures, utilities, fuel facilities, holding tanks, and access routes will be addressed. The applicant will work with Goodhue County, Florence Township, FEMA, the Minnesota Department of Natural Resources, and other applicable agencies to obtain all required approvals and ensure compliance with applicable grading and floodplain regulations.

4. The EAW and preliminary grading plan describe the general stormwater-management approach for the project. A final project-specific stormwater management plan will be prepared with the final grading plans and submitted to the applicable agencies for review and approval before construction begins.

The final plan will identify post-construction drainage areas, discharge points, permanent infiltration or treatment practices, stabilization measures, and maintenance responsibilities. It will also address management of runoff during significant rainfall events and measures to protect Lake Pepin. Construction-phase erosion and sediment controls will be addressed through the required Stormwater Pollution Prevention Plan. All applicable stormwater regulations and permit requirements will be followed.

5. In response to the MPCA's comments on the EAW, the we submitted itemized wastewater flow calculations for all proposed uses. The calculations identify 8,138 gallons per day directed to five proposed soil treatment systems and 5,100 gallons per day directed to holding tanks. The individual soil treatment systems have calculated design flows ranging from 1,492 to 1,809 gallons per day.

Final wastewater plans will be submitted to Goodhue County for review and approval through the applicable SSTS permitting process. The final plans will address system and reserve-area locations, holding-tank sizing, anticipated pumping frequency, seasonal operation and winterization, and monitoring and maintenance responsibilities. The systems will be designed by appropriately licensed professionals and operated in accordance with County permit requirements.

The two existing on-site wells will provide the project's domestic water supply. Well capacity and anticipated water use will be reviewed as part of final project design and permitting. If project water use reaches an applicable Minnesota Department of Natural Resources water-appropriation threshold, the required permit or authorization will be obtained before that level of water use occurs.

6. The existing fuel tanks will be removed and replaced with new compliant tanks and dispensing equipment. Final plans for the fuel system, boat-maintenance operations, holding tanks, and associated containment measures will be submitted to the applicable agencies for review and approval.

Before the facilities begin operating, the applicant will prepare spill-prevention and response procedures addressing fuel dispensing, storage of oils and maintenance products, secondary containment, protection of tanks and equipment during high-water events, emergency contacts, and response to a release. Any contaminated soil or groundwater encountered during construction will be managed and reported in accordance with applicable state and federal requirements. All required permits and applicable hazardous-material, floodplain, and environmental regulations will be followed.

7. The DNR Natural Heritage review and associated recommendations were included with the EAW. The Minnesota Department of Natural Resources also reviewed the completed EAW and stated that it generally approves of the project and its proposed recovery of

previously lost shoreline along Lake Pepin. The DNR's EAW comments did not request an additional mussel survey, aquatic-species study, or seasonal work restriction.

The final shoreline restoration and stabilization plan will be submitted to the Minnesota Department of Natural Resources and other applicable agencies for review and approval. Any required aquatic-species protection measures, seasonal restrictions, permits, or authorizations identified through that review will be incorporated into the final plans and followed during construction. Shoreline or riverbed work will not begin until the applicable approvals have been obtained.

8. The project site has been substantially disturbed by more than 75 years of commercial marina, boat-storage, repair, and mobile-home-park activities. Approximately 6 to 10 feet of sandy fill has also been placed across the site, and the proposed construction is not anticipated to extend below this fill into native soils.

The applicant submitted the project to the State Historic Preservation Office for review. In correspondence dated August 25, 2026, SHPO stated that no properties listed in the National Register of Historic Places or State Register of Historic Places are located within the proposed project area. SHPO recommended that the existing fill conditions and proposed areas of disturbance be documented in the EAW to support the determination that a Phase Ia assessment or Phase I archaeological survey is not necessary. That information has been included in the EAW.

Because a burial mound site has been identified in the general project vicinity, SHPO also recommended consultation with the Office of the State Archaeologist and the Minnesota Indian Affairs Council. The project was submitted to both OSA and MIAC for review, and neither agency provided comments or requested additional investigation.

If archaeological materials, human remains, or other potentially significant cultural resources are encountered during construction, work in the immediate area will stop and the appropriate agencies will be contacted before work resumes. If the project becomes subject to federal review, any additional consultation required under Section 106 of the National Historic Preservation Act will also be completed.

9. A final landscaping and site-restoration plan will be submitted with the final project plans for review and approval. The plan will identify vegetation to be retained, replacement trees and plantings, shoreline and erosion-control vegetation, visual screening, and areas requiring permanent stabilization. Native seed mixes will be utilized where applicable. The plan will also address establishment and ongoing maintenance of landscaped and restored areas.

A lighting plan has been developed to minimize disturbance to wildlife and neighboring properties. Exterior lighting will be directed downward and shielded where appropriate to

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reduce glare and light trespass. Lighting will be limited to the amount necessary for safe site access, security, and operation of the proposed facilities.

Construction noise and dust will be temporary and managed through standard construction practices and compliance with applicable regulations. Operational matters, including hours of operation, outdoor amplified sound, quiet hours, lighting, stormwater maintenance, wastewater management, shoreline protection, and emergency procedures, will be addressed through the final project plans, applicable permits, and conditional use permit conditions. The applicant will comply with all approved conditions and ongoing maintenance requirements.

Several of the Township's comments request that final construction documents, engineering plans, operational plans, and permit approvals be included in the EAW. The purpose of an EAW is to identify potential environmental effects of a proposed project, evaluate whether those effects may be significant, and describe measures available to avoid, minimize, or mitigate those effects. An EAW is not a construction permit, zoning approval, or final design document.

The EAW includes the preliminary plans and project information necessary to evaluate the reasonably foreseeable environmental effects of the proposed development. As reflected in the individual responses above, additional engineering details and final plans will be prepared during the subsequent design and permitting process. Those plans will be submitted to Goodhue County, Florence Township, and the applicable state and federal agencies for review and approval, as required.

The applicant understands that completion of the EAW does not authorize construction or replace any required conditional use permit, grading permit, floodplain approval, shoreland approval, stormwater permit, wastewater permit, building permit, or other applicable authorization. Any mitigation measures identified through the EAW and subsequent agency reviews will be incorporated into the final project plans and permit conditions, as applicable.

Please let me know if additional information or clarification is needed.

Sincerely,

Chris Priebe

Chris Priebe,
Senior Vice President