



Draft Environmental Assessment

Wadena County Fairgrounds Reconstruction Project

Wadena, Minnesota

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Table of Contents

	<u>Page</u>
Table of Contents	1
SECTION ONE: BACKGROUND	3
1.1 Project Authority	3
1.2 Project Location	3
1.3 Purpose and Need	4
SECTION TWO: ALTERNATIVES ANALYSIS	4
2.1 ALTERNATIVE 1 – NO ACTION ALTERNATIVE	4
2.2 ACTION ALTERNATIVE 2	4
2.3 ALTERNATIVES CONSIDERED AND ELIMINATED	5
SECTION THREE: AFFECTED ENVIRONMENT AND CONSEQUENCES	5
3.1 PHYSICAL ENVIRONMENT	5
3.1.1 Geology, Seismicity and Soils	5
3.1.2 Water Resources and Water Quality	6
3.1.3 Floodplain Management	6
3.2 BIOLOGICAL ENVIRONMENT	6
3.2.1 Terrestrial and Aquatic Environment	6
3.2.2 Wetlands	7
3.2.3 Threatened and Endangered Species	7
3.3 HAZARDOUS MATERIALS	8
3.4 SOCIOECONOMICS	9
3.4.1 Zoning and Land Use	9
3.4.2 Noise	10
3.4.3 Public Services and Utilities	10
3.4.4 Environmental Justice	10
3.4.5 Safety and Security	11
3.5 HISTORIC AND CULTURAL RESOURCES	11
3.5.1 Historic Resources	11
3.5.2 Archeological Resources	12
3.5.3 Indian Coordination and Religious Sites	12
3.6 COMPARISON OF ALTERNATIVES	13

Table of Contents (continued)

	<u>Page</u>
SECTION FOUR: CUMULATIVE IMPACTS	16
SECTION FIVE: PUBLIC PARTICIPATION	16
SECTION SIX: MITIGATION MEASURES AND PERMITS	16
SECTION SEVEN: CONSULTATIONS AND REFERENCES	16
SECTION EIGHT: LIST OF PREPARERS	18
Appendix A List of Tables/Figures	18
Appendix B Acronyms	18
Appendix C Project Maps and Alternatives	
Appendix D Agency Correspondence	
Appendix E Public Notice	

SECTION 1: BACKGROUND

1.1 PROJECT AUTHORITY

Pursuant to Section 406 of the Robert T. Stafford Disaster and Emergency Assistance Act of 1988, as amended, Wadena County, Minnesota and the Wadena County Agricultural Society have applied through the Homeland Security and Emergency Management Division of the Minnesota Department of Public Safety for funding through the Federal Emergency Management Agency (FEMA) Public Assistance Program. Funds are requested to reconstruct facilities destroyed or damaged at the Wadena County Fairgrounds. These facilities were destroyed or damaged during an EF4 tornado on June 17, 2010. Federal funding applied for consists of requests for Improved, Alternate and Replacement Projects. All requests for funding require FEMA approval of scopes of work prior to reconstruction and are subject to eligibility requirements.

An EF4 tornado hit the Wadena County Fairgrounds on June 17, 2010 and destroyed thirteen (48%) and damaged five (19%) of a total of twenty seven pre-tornado buildings. Only nine buildings of the original fairgrounds currently remain standing and undamaged by the tornado (Appendix C).

The Wadena County Fairgrounds has been operating on this 39.70 acre site continuously for the past ninety six years and has been in operation for one hundred and eighteen years. The fair started and continues today as an opportunity to showcase the local farmers' new farming practices, equipment, livestock and produce. In addition to the annual fair, the local sheriff's horse posse holds an annual training event in the spring, the local 4H club utilizes their building to host club events, to display artwork, to showcase skills such as woodworking, photography, sewing, other crafts and to hold community garage sales each summer, and the Wadena County Agricultural Society uses their buildings as a source of additional income by renting them out to the school district for bus storage.

The fairgrounds are owned and managed by Wadena County and the Wadena County Agricultural Society. Each separately owns buildings and carries separate insurance. Both entities selected members to serve on a steering committee to discuss and plan for reconstructing the fairgrounds.

In accordance with the National Environmental Policy Act of 1969, the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 Code of Federal Regulations [CFR] Parts 1500 through 1508), and FEMA regulations for NEPA compliance (44 CFR Part 10), FEMA must fully understand and consider the environmental consequences of actions proposed for federal funding. The purpose of this Environmental Assessment (EA) is to meet FEMA's responsibilities under NEPA and to determine whether to prepare a Finding of No Significant Impact (FONSI) or a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) for the proposed project.

1.2 PROJECT LOCATION

The Wadena County Fairgrounds is located at 400 Ash Avenue, NW, Wadena, Minnesota 56482. Ash Avenue is also known as U.S. Highway 10. The parcel number of the fairgrounds is R224701640 and consists of 39.70 acres. The parcel is bounded by residential lots along the east side of the property and commercial lots along the west side. The southern boundary is U.S. Highway 10 and the north side is bounded by wetlands. The legal description of the parcel is Sleeper's Addition to the City of Wadena-Part of Reserve Lot A and Reserve Lot B, Parts of the Northwest Quarter Southwest Quarter of the Southeast Quarter of Section 6, Township 134 North and Range 34 West.

1.3 PURPOSE AND NEED

The objective of the Federal Emergency Management Agency's (FEMA) Public Assistance Grant Program is to assist the community in recovering from the damage caused by natural disasters.

The need for the project is to reconstruct the substantially destroyed Wadena County Fairgrounds after it was struck by an EF4 tornado on June 17, 2010. This is the only fairgrounds in Wadena County and the reconstruction of the fairgrounds will allow the sub-applicants, the Wadena County Agricultural Society and Wadena County, to continue to fulfill their mission. Their mission is to preserve the past, promote the present, and to provide a platform to present ideas for the future. Ideas for the future include themes of agriculture (including human, animal and environmental), culture and arts, and sustainable economic prosperity of the county and region. The primary platform for the presentation of ideas is to each year hold and promote a county fair focusing on:

- Promoting the talents and youth of the county and region by providing exhibits and competition of projects that youth are involved in focusing on education, livestock and non-livestock farming, volunteerism, sports, arts and entrepreneurial activities.
- Highlighting the heritage of the county and region and its ties to agriculture, industry and businesses that are the economic backbone of the county and region.

SECTION TWO: ALTERNATIVE ANALYSIS

NEPA requires that all reasonable alternatives to the proposed actions must be examined. All reasonable alternatives include those that are practical or feasible from the technical and economic standpoint and using common sense. This chapter provides information on the development and evaluation of project alternatives. The development of alternatives is directly related to the purpose and need for the project. A no action alternative, a proposed action alternative and alternatives considered and eliminated are described in the following sections.

2.1 ALTERNATIVE 1 – NO ACTION ALTERNATIVE

Under the No Action Alternative, Wadena County and the Wadena County Agricultural Society would continue to operate from the existing destroyed and damaged facility. There would be no environmental impacts associated with the No Action Alternative, but the fairgrounds would not be functionally operational. Specifically the needs, identified in Section 1.3 above, would not be addressed.

2.2 ACTION ALTERNATIVE 2 – [Concept Master Plan for Reconstruction] (PROPOSED ACTION)

Reconstruction of the fairgrounds on the current fairgrounds location will provide for and restore current needs on a local and regional scale. The Center for Rural Design (CRD) created a Concept Master Plan for Reconstruction (Master Plan) of the fairgrounds on the current fairgrounds location. The Master Plan will provide for the needs as described in the purpose and need for the project.

The Master Plan calls for a redesign and construction of the drainage system, allows for building site work, utilities, sidewalks, turf establishment, parking lots and roads. The Judges or Announcer Stand, New Ideas Building, Show Arena, and Old 4H building will be replaced. The Horse Barn will be improved. A covered grandstand and sheriff's storage facility with meeting room, parking stalls, indoor shooting range and paved parking lot will be alternate projects to replacement of the Family Fun and Education Center and the Quonset Storage buildings (Appendix C).

2.3 ALTERNATIVES CONSIDERED AND ELIMINATED FROM FUTURE CONSIDERATION

Wadena County and the Wadena County Agricultural Society discussed relocation alternatives and eliminated them based on limited availability of land and economic feasibility. They also hired the University of Minnesota’s Center for Rural Design (CRD), a specialist multi-disciplinary research studio, to assist in finding alternatives for reconstruction of the fairgrounds. CRD developed three concept plans from which elements were chosen and incorporated into the Concept Master Plan for Reconstruction. The three individual concept plans were eliminated from further consideration as they did not allow for needs and conditions for spatial arrangements of buildings and their necessary facilities and/or site components (Appendix C).

SECTION THREE: AFFECTED ENVIRONMENT AND CONSEQUENCES

3.1 PHYSICAL ENVIRONMENT

This chapter describes the potential environmental consequences of the proposed alternative by comparing them with the potentially affected environmental components. Proposed activities were also evaluated against existing environmental documentation on current and planned actions and information on anticipated future projects to determine the potential for cumulative impacts. The potential for significant environmental consequences was evaluated utilizing the context and intensity considerations as defined in CEQ regulations for implementing the procedural provisions of NEPA (40 CFR 1508.27).

3.1.1 Geology, Seismicity and Soils

The Wadena County Fairgrounds is located in an urban area bounded on the north by wetlands, the east by a residential neighborhood, the south by US Highway 10/Ash Avenue and the west by commercial development. Topography is somewhat rolling with 1339 to 1348 foot above mean sea level elevations for an approximate 7 foot difference within the project area. The seismic hazard probability for this area is minimal.

Ground cover within the project area consists of asphalt, sandy topsoil and sand. Overall the soils are rather permeable with groundwater from 4.4 to 9 feet in geotechnical borings. Specifically, the Natural Resources Conservation Service (NRCS) web soil survey maps soils in the project area as:

Table 1: NRCS Soils

Map Unit Symbol	Map Unit Name	Approximate Percentage
567A	Verndale sandy loam, 0-2% slopes	33
1015	Psammments, nearly level	33
375	Forada loam	14
1975	Oylen sandy loam	12
207B	Nymore loamy sand, 3-6% slopes	2.5
1984	Leafriver muck	2.5
1942	Forada mucky loam, depressional	1.5
261	Isan loamy sand	1.5

Alternative 1 No Action–Under the No Action Alternative, no impacts to geology or soils would occur.

Alternative 2 Proposed Action–Under this alternative, construction activities would not be deep enough to impact underlying geologic resources. Short-term impacts to soils would occur during the construction period. Appropriate best management practices (BMPs) such as silt fencing, prompt planting of vegetation, and completion of landscaping would be used to minimize runoff.

3.1.2 Water Resources and Water Quality

The Clean Water Act (CWA), as amended in 1977, established the basic framework for regulating discharges of pollutants into waters of the United States. Existing site topography is shown on the project maps in Appendix C. The topography is somewhat rolling with an elevation difference of approximately seven feet, sloping to the north and the south

Various wetlands within the Wadena County Fairgrounds drain into Union Creek which drains into the Crow Wing River. The Crow Wing Watershed is located within the Upper Mississippi River Basin. No navigable waters are within the project area.

Alternative 1 No Action—Under the No Action Alternative, no adverse impacts to surface water would occur.

Alternative 2 Proposed Action- Under this Alternative, there would likely be little to no direct permanent impacts to surface waters because the impervious area would likely remain approximately the same. However, temporary short-term impacts to the wetlands could occur during the construction period because of altered site runoff and additional soil erosion. To reduce impacts to surface water, the applicant would implement appropriate BMPs, such as installing silt fences and prompt replanting of bare soils. No discharge of dredged or fill material into the wetlands is anticipated. If project plans change and discharge of dredging or fill into the wetlands is anticipated, the U.S. Army Corp of Engineers (USACE) indicates a need for a Section 404 permit (refer to the wetland and floodplain mapping provided in Appendix C).

3.1.3 Floodplain Management (Executive Order 11988)

Executive Order (EO) 11988 requires federal agencies to take action to minimize occupancy and modification of the floodplain. Specifically, EO 11988 prohibits federal agencies from funding construction in the 100-year floodplain unless there are no practicable alternatives. FEMA's regulations for complying with EO 11988 are promulgated in 44 CFR Part 9.

This project is not within an area of 1% annual or 0.2% annual chance of flooding as indicated on the Floodplain Insurance Rate Map (FIRM), panel #270495001C dated July 17, 1986 for the City of Wadena, Wadena County, Minnesota. Specifically, the project is located in Zone C, an area of minimal flood hazard, depicted on FIRMs as outside the mapped Special Flood Hazard Area.

Alternative 1 No Action—Under the No Action Alternative, no impacts to mapped floodplains would occur.

Alternative 2 Proposed Action- Under this Alternative, no impacts to mapped floodplains would occur.

3.2 BIOLOGICAL ENVIRONMENT

3.2.1 Terrestrial Environment

The proposed project site is the Wadena County Fairgrounds located on the western edge of the City of Wadena. According to the sub-applicants, the county fair has been operating on this site for the past ninety six years. The parcel is bounded by residential lots along the east side of the property and commercial lots along the west side. The southern boundary is U.S. Highway 10 and the north side is bounded by wetlands. The proposed site supports wildlife common to urban developed land. Overall, the fairgrounds site and surrounding area has been developed over the past ninety six years and as such, the

area would be considered to have limited value for plant and wildlife species. However, the wetlands to the north have the potential to provide an environment for plant and wildlife species.

Alternative 1 No Action—Under the No Action Alternative, no impacts to the terrestrial environment would occur.

Alternative 2 Proposed Action— Under this Alternative, short-term adverse impacts to the terrestrial environment could occur during construction. Appropriate BMPs would be required at the construction site, including, but not limited to, the installation of silt fences and the revegetation of bare soils to minimize erosion.

3.2.2 Wetlands (Executive Order 11990)

The United States Army Corp of Engineers (USACE) regulates the discharge of dredged or filled materials into waters of the United States including wetlands, pursuant to Section 404 of the Clean Water Act. Additionally, EO 11990 (Protection of Wetlands) requires Federal agencies to avoid, to the extent possible, adverse impacts on wetlands that may result from federally funded actions.

A wetland delineator certified through the Minnesota Board of Water and Soil Resources identified three wetlands within the Wadena County Fairgrounds. Consultation with the USACE was initiated to determine whether there are potential impacts to waters of the US including wetlands or whether permits will be required.

Alternative 1 No Action—Under the No Action Alternative, no impacts to waters of the U.S., including wetlands would occur.

Alternative 2 Proposed Action—Under Alternative 2, during construction, short-term adverse impacts to waters of the U.S., including wetlands, could occur at the proposed project site. Use of BMPs would minimize erosion at the site and mitigate potential impacts to water resources in the area. No site work that involves a discharge of dredged or fill material into any waters including those delineated wetlands is anticipated. If project plans change and discharge of dredging or fill into the wetlands is anticipated, the U.S. Army Corp of Engineers (USACE) indicates a need for a Section 404 permit.

3.2.3 Threatened and Endangered Species

In accordance with Section 7 of the Endangered Species Act (ESA) of 1973, the project area was evaluated for the potential occurrences of federally listed threatened and endangered species. The ESA requires any federal agency that funds, authorizes or carries out an action to ensure that their action is not likely to jeopardize the continued existence of threatened or endangered species or result in the destruction or adverse modification of designated critical habitats.

Research was performed to identify any potential Threatened, Endangered, Proposed, or Candidate species at the proposed project site. The following resources were reviewed: U.S. Fish and Wildlife Service (USFWS) listing of Threatened, Endangered, Proposed, or Candidate species for Wadena County and the MDNR Rare Species Guide for Wadena County. The USFWS does not list any federally Threatened, Endangered, Proposed or Candidate species for Wadena County (USFWS 2012). MDNR lists the following species as Threatened within Wadena County.

Table 2: MDNR Threatened Species

Scientific Name	Common Name	Status
<i>Emydoidea blandingii</i>	Blanding's Turtle	Threatened
<i>Cypripedium arietinum</i>	Ram's-head Lady's-slipper	Threatened
<i>Cygnus buccinator</i>	Trumpeter Swan	Threatened

Alternative 1 No Action—Under the No Action Alternative, no impacts to threatened species would occur.

Alternative 2 Proposed Action—Under Alternative 2, construction, long term impacts to state listed threatened and endangered species are not anticipated as the fairgrounds has been in existence in this location for ninety six years. Short-term impacts to state listed threatened and endangered species habitat are not likely to occur. Proper BMPs will further reduce the likelihood of adverse impacts to the state listed species and habitat. FEMA initiated consultations with MDNR with supporting documentation to seek comment and any potential project conditions to reduce the likelihood of any adverse impacts to the state listed species and habitat (Appendix D). To date, no responses to the consultation have been received.

3.3 HAZARDOUS MATERIALS

Two statutes of primary importance governing the handling and disposal of hazardous materials, chemicals, substances and waste are the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA or Superfund) and the Resource Conservation and Recovery Act of 1976 (RCRA) as amended by the Federal Facilities Compliance Act of 1992. CERCLA provides for consultation with natural resources trustees and cleanup of any release of a hazardous substance (excluding petroleum) into the environment. RCRA governs the generation, treatment, storage, and disposal of hazardous waste.

Hazardous waste and substances were identified by inventorying all of the hazardous sites identified by the United States Environmental Protection Agency (USEPA) under CERCLA and RCRA. Specifically, to identify potential hazardous materials sites in the vicinity of the project area, environmental databases were reviewed in April 2012. The CERCLA database was accessed through the USEPA and state databases were accessed through the Minnesota Pollution Control Agency (MPCA). The state databases include, Minnesota Aboveground / Underground Storage Tank Sites, RCRA Cleanup Sites, Superfund Sites and CERCLIS Sites.

The CERCLIS and MPCA databases do not indicate any Superfund sites within the City of Wadena or Wadena County. The MPCA database lists the following hazardous leaks of which one was directly within the Wadena County Fairgrounds.

Table 3: MDNR Hazardous Leaks

Site Name	Address	Leak	Discovery Date	Remediation	Close Date
Wadena County Highway Department	4 th St. SW Wadena County Fairgrounds	Diesel Leak	06-04-1991	Soil Corrective Action Plan and Remedial Investigation	04-15-1993
Wadena Deer Creek Public Schools Bus	433 Ash Ave. NW	Diesel Leak	12-20-2010	Ongoing	N/A

Garage					
Westside Sports	508 Ash Ave NW	Gasoline	10-16-1991	Soil Corrective Action Plan	05-28-1997
Heartland Tire Service	507 Ash Ave NW	Diesel	09-07-2010	Ongoing	N/A

The MPCA database lists the following underground tanks of which none were directly within the Wadena County Fairgrounds.

Table 4: MDNR Underground Tanks

Site Name	Address	Install Date	Tank Type	Tank Status
Wadena Ind School Dist. #2155/Bus Garage	433 Ash Ave NW	08-27-1984	Diesel and Fuel Underground	Removed
Westside Sports	508 Ash Ave NW	01-01-58	Gasoline and Diesel Underground	Removed
Heartland Tire Service	507 Ash Ave NW	10-04-72, 12-10-80, 10-31-85, 06-03-91, 07-10-93	Gasoline, Diesel, Used or Waste Oil Underground	Removed

Alternative 1 No Action—Under the No Action Alternative, there would be no construction and there would be no impacts related to hazardous materials or waste.

Alternative 2 Proposed Action—Under this Alternative, no hazardous materials or waste-related impacts would be anticipated. Proposed construction activities would require only minimal excavation and should not expose hazardous materials or produce hazardous wastes. Any hazardous materials discovered, generated, or used during construction would be handled and disposed of in accordance with applicable local, State, and Federal regulations.

3.4 SOCIOECONOMICS

3.4.1 Zoning and Land Use

The Wadena County Zoning Ordinance #1 as amended March 6, 2012, classifies the Wadena County Fairgrounds as an A-1 Transitional Agricultural District. The only regulation identified by the county pertaining to the district is a front yard setback of one hundred and thirty feet from the centerline of U.S. Highways and State Highways. According to the Minnesota Department of Labor and Industry (Center for Rural Design, A Concept Master Plan for Reconstruction), county fairgrounds are exempt from zoning, building and other ordinances of the town or city within which it is located during both fair and other times of the year. No changes in the size, number and locations of entrances to the fairgrounds are planned or have occurred.

The Wadena County Fairgrounds has been in continuous operation in this location for ninety six years. The fair started and continues today as an opportunity to showcase the local farmer’s new farming practices, equipment, livestock and produce. The local sheriff’s horse posse holds an annual training event in the spring. The Wadena County Agricultural Society uses their buildings as a source of additional income by renting them out to the school district for bus storage. The local 4H club utilizes their building to host club events and to hold community garage sales each summer.

Alternative 1 No Action—Under the No Action Alternative, there would be no changes to zoning or transportation.

Alternative 2 Proposed Action—Under Alternative 2, there would be temporary increases in the volume of construction-related traffic in the immediate vicinity of the proposed project site. Traffic disruptions on Ash Avenue and slower traffic flow would be likely during construction. To mitigate potential delays construction vehicles and equipment would be stored on-site during construction to the extent possible. Over the long term, there would be little to no vehicle traffic increase at the proposed project site. Current zoning regulations require a front yard setback of one hundred and thirty feet from the centerline of US Highway 10. Alternate 2 would eliminate violations to the set back regulation by not reconstructing the Industrial Merchant and Family Fun Center buildings in their original locations.

3.4.2 Noise

Noise can be considered unwanted sound and sound is typically measured in decibels (dB). An average measure of sound is known as the day-night average sound level (Ldn), and is used by agencies for estimating sound impacts and establishing guidelines for compatible land uses. An EPA document, *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety* (EPA 1974) provides a basis for State and local governments' judgments in setting standards. The document identifies a 24-hour exposure level of 70 dB as the level of environmental noise that will prevent any measurable hearing loss over a lifetime. Also, levels of 55 dB outdoors and 45 dB indoors are identified as preventing activity interference and annoyance. These levels are considered those which will permit spoken conversation and other activities such as sleeping, working and recreation. The levels are not single event, or “peak” levels, but rather, they represent averages over long periods of time. Occasional higher noise levels would be consistent with a 24-hour average of 70 dB, as long as a sufficient amount of relative quiet is experienced.

Alternative 1 No Action—Under the No Action Alternative, no impacts related to noise would occur.

Alternative 2 Proposed Action—Under Alternative 2, only temporary short-term increases in noise levels would be anticipated during construction. To reduce noise levels during that period, construction activities would be restricted to normal business hours. Equipment and machinery utilized at the site would meet all local, State, and Federal noise regulations.

3.4.3 Public Services and Utilities

There are no current public services on the Wadena County fairgrounds relating to police, fire, and rescue. The Wadena County Agricultural Society rents the Horse Barn to the local school district for bus storage. Electric, water and sewer lines are also located within the fairgrounds.

Alternative 1 No Action—Under the No Action Alternative, no impacts related to public services and utilities would occur.

Alternative 2 Proposed Action—Under Alternative 2, only temporary short-term impacts to public services and utilities would occur. Upgrades to utilities would meet all local, State, and Federal regulations. Construction of the Sheriff’s storage building would benefit the local community.

3.4.4 Environmental Justice (Executive Order 12898)

EO 12898 *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* mandates that Federal agencies identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority and low-income populations. Socioeconomic and demographic data for the project area were analyzed to

determine if a disproportionate number of minority or low-income persons have the potential to be adversely affected by the proposed project.

The U.S. Census Bureau data for Wadena County, Minnesota, indicates that 96.7% of the population is white, 0.8% African American, 0.5% American Indian or Alaska Native, 0.13% Asian, 1.5% two or more races and 1.3% Hispanic or Latino origin (U.S. Census Bureau, 2012) with 16.8% of the population living below the poverty level. No concentration of minority or low income populations were identified near the proposed project site.

Alternative 1 No Action—Under the No Action Alternative, there would be no disproportionately high and adverse effects on minority or low-income populations.

Alternative 2 Proposed Action—Under this alternative, there would be no disproportionately high and adverse impacts on minority or low-income populations. Improvements to the existing facility would benefit all populations.

3.4.5 Safety and Security

A metal security fence around the perimeter of the fairgrounds is in place. Landscaping of fifty trees and shrubs were planted to further enhance security by creating a vegetative barrier along US. Highway 10.

Alternative 1 No Action—Under the No Action Alternative, there would be no impacts related to safety and security.

Alternative 2 Proposed Action—Under this alternative to minimize risks to safety and human health, all construction activities would be performed using qualified personnel trained in the proper use of the appropriate equipment including all appropriate safety precautions. Additionally, all activities would be conducted in a safe manner in accordance with the standards specified in Occupational Safety and Health Act (OSHA) regulations. All local, state and national regulations will be followed to address child safety for the fairgrounds during actual events.

3.5 HISTORIC AND CULTURAL RESOURCES

Concurrently with review under NEPA, consideration of effects to historic properties is mandated under Section 106 of the National Historic Preservation Act of 1966, as amended, and implemented by 36 CFR Part 800 (NHPA). NHPA requires that projects needing federal approval and/or federal permits be evaluated for the effects on historic properties. Historic properties are defined as buildings, structures, objects, sites, or districts included or eligible for listing on the National Register of Historic Places (NRHP). The purpose of this section is to document compliance with NEPA and the NHPA by identifying historic properties within the area of potential effect (APE) including a description of the probable impact of the alternatives under consideration on these resources.

3.5.1 Historic Structures

The NHPA requires that the Lead Federal agency, FEMA, consult with the State Historic Preservation Office (SHPO) and any other interested consulting parties, including members of the public or Native American Tribes (Tribes). As such, consultation with the SHPO was initiated on July 13, 2010 to inform them of the scope of the undertaking and to provide ongoing opportunities for informal and formal review of the project's potential effect on historic resources. The sub-applicants were the only consulting parties with an interest in the fairgrounds that were identified. Consultation with the SHPO began with a description of proposed repairs to a cattle barn and subsequently revealed that SHPO had previously considered the twenty seven buildings on the Wadena County Fairgrounds eligible for NRHP listing as an historic district.

FEMA provided post event aerial photographs illustrating that the tornado destroyed thirteen (48%) and damaged five (19%) that had been standing before the tornado hit. After reviewing the damage wrought by the tornado, FEMA determined and the SHPO concurred that due to the damage from the tornado, the fairgrounds were no longer eligible for listing, and that no historic properties listed or eligible for listing on the NR would be affected by the undertakings.

Changes to the scope of work resulted in a third round of consultation with the SHPO on April 12, 2012. FEMA determined and SHPO concurred in a letter dated April 25, 2012 that no historic properties would be affected by the Proposed Action (Appendix C).

Alternative 1 No Action—Under the No Action Alternative, there would be no impacts to historic properties.

Alternative 2 Proposed Action—Under this Alternative, there would be no impacts to historic properties.

3.5.2 Archaeological Resources

In addition to requirements under NEPA and the NHPA, there are provisions required under the Archaeological and Historic Preservation Act of 1974 (AHAP). This act provides for the survey, recovery, and preservation of significant scientific, prehistoric, archaeological or paleontological data when such data may be destroyed or irreparably lost due to a federal, federally licensed, or federally funded project.

It should be noted that in accordance with 16 U.S.C. 470hh(a), information concerning the nature and location of archaeological resources and traditional cultural properties, and detailed information regarding archaeological and cultural resources, is confidential. Such information is exempt from the Freedom of Information Act and is not included in this EA.

An archaeological site and literature search for the Wadena County fairgrounds revealed that no archaeological sites are known to exist within the fairgrounds. FEMA conducted a reconnaissance level survey of the direct areas of potential effect to determine if significant intact archaeological deposits eligible for listing on the NRHP would be impacted. No archaeological artifacts were located. SHPO consultation was initiated on April 12, 2012 to indicate that it was not likely that significant intact archaeological deposits exist. SHPO concurred that no historic properties will be affected on April 25, 2012.

Alternative 1 No Action—Under the No Action Alternative, there would be no impacts to historic properties.

Alternative 2 Proposed Action—Under this Alternative, there would be no impacts to historic properties.

3.5.3 Tribal Coordination and Religious Sites

36 CFR 800.8(a)(2) indicates that consultation with Tribes begin early in the NEPA process regarding the possible effects of disaster recovery efforts on cultural properties of historic or traditional significance, referred to as Traditional Cultural Properties. Amendments to Section 101 of the NHPA in 1992 strengthened the interface between the NHPA and the American Indian Religious Freedom Act of 1978 (AIRFA). AIRFA requires consultation with Native American groups concerning proposed actions on sacred sites on federal land or affecting access to sacred sites. It establishes federal policy to protect and preserve for American Indians, Eskimos, Aleuts, and Native Hawaiians their right to free exercise of their religion in the form of site access, use and possession of sacred objects, and freedom to worship through ceremonial and traditional rites. AIRFA requires federal agencies to consider the impact of their actions on religious sites and objects important to these peoples, regardless of eligibility for listing on the NRHP.

Tribal consultation was also undertaken per Executive Order (EO) 13175, titled *Consultation and Coordination with Indian Tribal Governments* signed by President Clinton on November 6, 2000. The EO directs federal agencies, “to establish regular and meaningful consultation and collaboration with tribal officials in the development of Federal policies that have tribal implications, to strengthen the United States government-to-government relationships with Indian tribes, and to reduce the imposition of unfunded mandates upon Indian tribes... .”

Requests for evaluation of the presence or absence of known Traditional Cultural Properties within the proposed project areas were submitted on April 12, 2012, to the Minnesota Chippewa Tribe and to the Prairie Island Indian Tribe to determine if they may have an interest in projects located in Wadena County, Minnesota. To date, no responses have been received on the proposed project. Details of the consultation are included in **Appendix D**.

Alternative 1 No Action–Under the No Action Alternative, there would be no impacts to Traditional Cultural Properties.

Alternative 2 Proposed Action–To date, no comments on the proposed project have been received. Under this Alternative, no impacts to Traditional Cultural Properties are anticipated.

3.6 Comparison of Alternatives

This section outlines in tabular form the potential impacts of the No-Action Alternative and the Proposed Action Alternative. Conditions or mitigation measures to offset these potential impacts are detailed in the summary table provided below.

Table 5: Comparison of Alternatives

<i>Affected Environment</i>	<i>Impacts</i>	<i>Mitigation</i>
Geology, Seismicity and Soils	No Action: No impacts	Appropriate best management practices (BMPs) such as silt fence, prompt planting of vegetation, and completion of landscaping would be used to minimize runoff.
	Proposed Action: No impacts deep enough to impact underlying geologic resources. Short-term effects to soils would occur during the construction period.	
Water Resources and Water Quality	No Action: No impacts.	To reduce impacts to surface water, the applicant would implement appropriate BMPs, such as installing silt fences and prompt replanting of bare soils..
	Proposed Action: Likely be little to no direct permanent impacts to surface waters because the impervious area would likely remain approximately the same. However, temporary short-term impacts to the wetlands could occur during the construction period because of altered site runoff and additional soil erosion.	
Floodplain Management	No impacts under No Action or Proposed Action.	None.
Terrestrial	No Action: No Impacts	Appropriate BMPs would be

	Proposed Action: Short-term adverse impacts to the terrestrial environment due to construction activities could occur.	required at the construction site, including, but are not limited to, the installation of silt fences and the revegetation of bare soils to minimize erosion.
Wetlands	No Action: No Impacts	Use of (BMPs) would minimize erosion at the site and mitigate potential impacts to water resources in the area. Appropriate BMPs would be required at the construction site, including, but are not limited to, the installation of silt fences and the revegetation of bare soils to minimize erosion. No site work that involves a discharge of dredged or fill material into any waters including those delineated wetlands is anticipated. If project plans change and discharge of dredged or fill material may occur, the USACE indicated that a Department of the Army (DOA) permit, under Section 404 of the Clean Water Act, will be necessary.
	Proposed Action: Short-term adverse impacts to waters of the U.S., including wetlands, could occur at the proposed project site.	
Threatened and Endangered Species	No Action: No impacts	Proper BMPs will further reduce the likelihood of short term impacts to the state listed species and habitat. FEMA initiated consultations with MDNR with supporting documentation to seek comment and any potential project conditions to reduce the likelihood of any short term adverse impacts to the state listed species and habitat.
	Proposed Action: Long term impacts to state listed and threatened endangered species are not anticipated. Short-term impacts to state listed threatened and endangered species are not likely to occur.	
Hazardous Materials	No Action and Proposed Action: No impacts anticipated.	Proposed construction activities would require only minimal excavation and should not expose hazardous materials or produce hazardous wastes. Any hazardous materials discovered, generated, or used during construction would be handled and disposed of in accordance with applicable local, State, and Federal regulations.
Zoning and Land Use	No Action: No impacts.	To mitigate potential delays construction vehicles and
	Proposed Action: The volume of	

	<p>construction-related traffic in the immediate vicinity of the proposed project site would occur. Traffic disruptions on Ash Avenue and slower traffic flow would be likely during construction. Over the long term, there would be little to no vehicle traffic increase at the proposed project site. Current zoning regulations require a front yard setback of one hundred and thirty feet from the centerline of US. Highway 10.</p>	<p>equipment would be stored on-site during construction to the extent possible.</p> <p>Proposed Action would eliminate violations to the set back regulation by not reconstructing the Industrial Merchant and Family Fun Center buildings in their original locations.</p>
Noise	No Action: No Impacts	<p>To reduce noise levels during that period, construction activities would be restricted to normal business hours. Equipment and machinery utilized at the site would meet all local, State, and Federal noise regulations</p>
	Proposed Action: Temporary short-term increases in noise levels would be anticipated during construction.	
Environmental Justice	No Impacts.	Improvements to the existing facility would benefit all populations.
Safety and Security	No Action: No Impacts.	<p>To minimize risks to safety and human health, all construction activities would be performed using qualified personnel trained in the proper use of the appropriate equipment including all appropriate safety precautions; additionally, all activities would be conducted in a safe manner in accordance with the standards specified in Occupational Safety and Health Act (OSHA) regulations. All local, state and national regulations will be followed to address child safety for the fairgrounds during actual events</p>
	Proposed Impacts: Temporary short term impacts.	
Historic and Cultural Resources	No Impacts.	
Archaeology	No Impacts.	
Traditional Cultural Properties	No Action: No Impacts	
	Proposed Action: To date no responses have been received.	

SECTION FOUR: CUMULATIVE IMPACTS

According to CEQ regulations, cumulative impacts represent the “impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7).” FEMA did not identify any reasonably foreseeable proposed or occurring actions by others in the vicinity of the proposed project site. Therefore, no cumulative impacts are anticipated.

SECTION FIVE: PUBLIC PARTICIPATION

FEMA is the lead Federal agency for conducting the NEPA compliance process for the Wadena County Fairgrounds in the City of Wadena, Wadena County, Minnesota. It is the goal of the lead agency to expedite the preparation and review of NEPA documents and to be responsive to the needs of the community and the purpose and need of the proposed action while meeting the intent of NEPA and complying with all NEPA provisions.

Interagency reviews have been conducted in the form of agency consultation letters and the responses received from the agencies. Agencies consulted are listed in Section 6. Agency responses are provided in Appendix D.

The proposed project has been discussed at numerous Wadena County Board Meetings that are open to the public. The Wadena County Board will notify the public of the availability of the draft EA through publication of a public notice (see Appendix E) in a local newspaper. FEMA will conduct a 30 day public comment period commencing on the initial date of publication of the public notice.

SECTION SIX: MITIGATION MEASURES AND PERMITS

In accordance with applicable local, State, and Federal regulations, the applicant would be responsible for acquiring any necessary permits or meeting codes prior to commencing construction at the proposed project site. The following permits and approvals may be required prior to construction:

1. Minnesota Department of Natural Resources
2. United States Army Corps of Engineers
3. Minnesota State Building, Electrical, Accessibility, Plumbing, Bleacher, Elevator, HPP, Boilers, Fire and Amusement Ride Codes
3. International Building Code for Group U-Agricultural Buildings
4. Wadena County Zoning

SECTION SEVEN: CONSULTATIONS AND REFERENCES

The following agencies, organizations and references were consulted or were contacted to request project information or review during the preparation of this EA. Responses received to date are included in Appendix D.

1. Minnesota Chippewa Tribe, President Norman Deschampe
2. Prairie Island Indian Community, President Ronald Johnson
3. Minnesota Department of Natural Resources
4. Minnesota State Historical Society, State Historic Preservation Office

5. United States Army Corps of Engineers
6. Wadena County Highway Department, Ryan Odden, County Engineer and Cara Bengtson Highway Accountant
7. Wadena County Board
8. Wadena County Historical Society

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United States Environmental Protection Agency, *CERCLIS Public Access Database*, March 2012. <http://cumulis.epa.gov/supercpad/cursites/srchsites.cfm> (March 2012).

United States Geological Survey, *Earthquake Hazards Program, Seismicity and Seismic Hazard Map for Minnesota*, March 2012. <http://earthquake.usgs.gov/earthquakes/states/minnesota...>(March 2012).

Wadena County, *Zoning Ordinance #1, Section 6: A-1 Transitional Agricultural District*. Amended March 6, 2012.

SECTION EIGHT: LIST OF PREPARERS

Preparation and quality control review of Draft and Final EA:

Ryan Odden, Wadena County Highway Department, County Engineer
Wayne Lamoreaux Minnesota Homeland Security and Emergency Management Public Assistance
Engineering Specialist
Nicholas Mueller, FEMA Acting Regional Environmental Officer
Karen Poulson, FEMA Historic Preservation Specialist

APPENDIX A: LIST OF TABLES

Table 1: NRCS Soils
Table 2: MDNR Threatened Species
Table 3: MDNR Hazardous Leaks
Table 4: MDNR Underground Tanks
Table 5: Comparison of Alternatives

APPENDIX B: ACRONYMS AND ABBREVIATIONS

AIRFA American Indian Religious Freedom Act
AHAP Archaeological and Historic Preservation Act
BMP Best Management Practice
CERCLA Comprehensive Environmental Response, Compensation and Liability Act
CEQ Council on Environmental Quality
CFR Code of Federal Regulations
CRD Center for Rural Design
CWA Clean Water Act
DOA Department of the Army
EA Environmental Assessment
EIS Environmental Impact Statement
EO Executive Order
EPA Environmental Protection Agency
ESA Endangered Species Act
FEMA Federal Emergency Management Agency
FIRM Floodplain Insurance Rate Map
FONSI Finding of No Significant Impact
MDNR Minnesota Department of Natural Resources
MPCA Minnesota Pollution Control Agency
NEPA National Environmental Policy Act
NHPA National Historic Preservation Act
NOI Notice of Intent
NRCS Natural Resources Conservation Service
NRHP National Register of Historic Places

RCRA Resource Conservation and Recovery Act
SARA Superfund Amendments and Reauthorization Act
SHPO State Historic Preservation Office
USACE U.S. Army Corps of Engineers
USFWS U.S. Fish and Wildlife Service

APPENDIX C: PROJECT MAPS AND ALTERNATIVES

APPENDIX D: AGENCY CORRESPONDENCE

APPENDIX E: PUBLIC NOTICE
