



**US Army Corps
of Engineers**
St Paul District

SPONSOR: City of Edina

Public Notice

ISSUED: 4/25/2024

EXPIRES: 5/25/2024

REFER TO: 2016-03845-EJI; Fred
Richards Park Wetland
Bank

SECTION: 404 - Clean Water Act

1. WETLAND COMPENSATORY MITIGATION BANK PROPOSAL

2. SPECIFIC INFORMATION

SPONSOR'S ADDRESS: Rachel Finberg- Park Planner
City of Edina
4801 W. 50th Street
Edina, MN 55424

SPONSOR'S AGENT Christopher Long, CMWP - Ecological Designer
Emmons and Olivier Resources, Inc.
1919 University Avenue W suite 300
Saint Paul, MN 55104

PROJECT LOCATION: The project site is located in Section 31, Township 28 North, Range 24 West, Hennepin County, Minnesota. The approximate UTM coordinates are X: 473076.264658 Y: 4968124.556574. Latitude: 44.866029, Longitude: -93.340812

BANK SERVICE AREA: The proposed bank service area (BSA) is the Minnesota River Basin in Minnesota (BSA 9). The site is located in the Nine Mile Creek minor watershed, and the Lower Minnesota River major watershed.

DESCRIPTION OF PROJECT: The sponsor is proposing to develop the Fred Richards Park Wetland Bank, located on the western half of Fred Richards Park within two parcels owned by the City of Edina (PIN 3102824310058 and 3102824310056). The proposed bank easement would follow the northern boundary of both parcels until the boundary intersects with Kellogg Avenue. A 10-foot buffer will be maintained between the parcel boundary and legal easement boundary to allow for utility access to the site. The easement boundary will proceed south until it intersects with the Nine Mile Creek Regional Trail Easement. The regional trail easement will form the southern and eastern boundary of the proposed wetland bank easement. The proposed easement will include a pedestrian trail and several programming spaces along the northern side of the bank. The proposed pedestrian trail will connect to the Nine Mile Creek Regional Trail and provide passive recreation and nature enjoyment to the public. The trail will include two programming spaces for education and interpretation of the bank's goals and diverse ecology.

NEED AND OBJECTIVE OF PROJECT: The sponsor's stated objective is to restore as much of the bank site as possible to historic wet prairie, while recognizing its new role in the urban environment for providing environmental education and flood mitigation. The functional benefits of the site will be restoration of wetland hydrology and native wetland flora, support of native pollinators, enhanced floodplain storage, as well as environmental education and wellness through contact with nature.

According to the sponsor, the project would help fill a need for wetland mitigation credits within Hennepin County. The Hennepin County Board of Supervisors has provided guidance stating that projects which intend to impact wetlands should seek wetland mitigation credits from within the county first before looking for credits within the wider major watershed or bank service area. Wetland mitigation credits within the county are lacking; as of September 2023 there were a total of 1.96 credits available in the county and zero credits available that are both within the same major watershed as the proposed bank (Minnesota River-Shakopee Watershed) and within Hennepin County. The sponsor proposes that credits from the bank would serve projects in Bloomington, Eden Prairie, and parts of Richfield, Edina, and Minnetonka.

ESTABLISHMENT, OPERATION AND MANAGEMENT: The bank will be separated from the municipal stormwater system by a static inlet weir and a variable height outlet weir with a backflow preventer. The first 1" of rainfall that is received by the municipal system will be routed around the bank, however larger storm events such as the 2-year storm event (2.83" of rainfall), will be allowed to enter the bank over the weir. This will prevent over 90% of the annual stormwater volume from entering the bank. An outlet weir leading to a culvert with a backflow preventer will allow the bank to drain to its existing control elevation after a storm, while preventing smaller storm events from back flowing into the bank. New stormwater infrastructure will be installed to route the municipal system around the south side of the bank. Since the evidence suggests that the ponds are groundwater fed, the sponsor states that water from the municipal system is not needed to support wetland hydrology in the bank, and these changes will support a more stable and natural bank hydrology. All internal drainage systems within the bank will be removed. This includes culverts connecting the ponds and the tile drains underneath the greens. The proposed restoration would also remove golf course fills to re-expose historic wetland soils and lower the ground surface to within 12 inches of the water table.

OWNERSHIP AND LONG-TERM MANAGEMENT: The City of Edina Parks & Recreation Department is the sponsor, the landowner, and will be the ultimate credit holder for the proposed bank. Long-term management of the bank and the park is proposed to be undertaken by the Parks & Recreation Department. This project would include an installation and establishment contract for monitoring and maintenance based on requirements set forth by the mitigation bank instrument. After installation and establishment, it will then graduate to their long-term maintenance program which is issued in 3 year cycles.

TECHNICAL FEASIBILITY AND QUALIFICATIONS: According to the information provided by the sponsor within the prospectus, the proposed wetland mitigation bank is technically feasible because it has largely retained its native soils, and natural hydrology can be restored by a few sustainable modifications. The hydrology data indicates that the site has a high water table that maintains consistent water levels in the ponds throughout the growing season. Although raising the water table to its presumed historic condition is not possible for risk of flooding out neighboring residents; natural hydrology could be restored by dismantling the drainage network in the proposed bank site and disconnecting the bank from the municipal stormwater system. The soil would be scraped to within one foot of the water table to create wet prairie and wet meadow habitats. This scraping would also serve to remove golf course fills including stabilization soils, the tile drainage system, and the stabilization fabric underneath the former playing surfaces. In regard to qualifications, the project sponsor states that the Edina Parks & Recreation Department has maintained a public park system of over 1,550 acres of open space consisting of parkland, forests, lakes, and wetlands for 135 years. These parks have a wide range of objectives from nature preservation to public recreation. Edina's Land Management Plan & Natural Areas Restoration Opportunities 2023 Update describes the City's growing commitment to restore and maintain native ecosystems within their municipal parks. The Parks & Recreation Department has hired Confluence, a leading landscape architecture and urban design firm, to integrate the proposed wetland mitigation bank within Fred Richards Park.

Emmons and Olivier Resources, Inc (EOR) was hired to guide the establishment of the bank. EOR is a water resources engineering firm that has experience designing water resource infrastructure for ground and surface water management. EOR has designed and overseen the implementation of wetland restoration projects for water quality mitigation. EOR has worked as the WCA LGU's technical representative for the Lake Superior Wetland Mitigation Bank for almost a decade including subsequent phases of the project. EOR has provided key analysis to support credit release and guide the development of the bank. EOR also has significant wetland banking experience providing technical resources to bank sponsors. EOR's construction and restoration experience includes many projects in similar degraded peatland areas.

ECOLOGICAL SUITABILITY: As stated by the sponsor, the site is at the location of a historic wet meadow. Since at least 1956 it has been drained for human use as either farming, or more recently, as a golf course. The soils in this location are still suitable for wetland restoration. Although some fill has been added, much of the native muck soil remains in a degraded state. Wetland hydrology is also achievable because the site has a high water table as described above. Although the existing vegetation is dominated by non-native invasive species and weedy natives, patches of more valuable hydrophytic species have been found growing in the wetlands including spikerush (*Eleocharis* sp.), bluejoint (*Calamagrostis canadensis*), various sedges (*Carex* sp.), nodding beggarticks (*Bidens cernua*), swamp milkweed (*Asclepias incarnata*), common boneset (*Eupatorium perfoliatum*) and pennywort (*Hydrocotyle* sp.). The proposed bank site is limited in its ability to support a full range of wildlife by its small size and its location in a suburban environment. Despite the urban location, the sponsor indicates the park hosts a healthy population of frogs and toads and notes observations of deer, mallards and even rusty patched bumblebee. The bank could become an important link in the variety of natural areas in the vicinity like Lake Edina, Lake Cornelia, Normandale Lake and Braemar Park. The sponsor proposes to buffer the bank from the rest of the park by earthen mounds and native trees and shrubs and minimize human disturbance within the bank by the use of boardwalks, clearly marked paths, and signage.

HYDROLOGY: Historically, the large wetland complex that occupied the area drained westward towards the Nine Mile Creek riparian corridor. The present-day hydrology is highly altered by urbanization. Large amounts of fill have been placed in the historic wetland complex to create stable land for roads and buildings in the neighborhoods surrounding the park. Lake Edina, which is located 380 feet north of the proposed bank site, is the nearest Public Waters basin. Fred Richards Park is still a low-lying area within the local terrain, but it has been cut off from Nine Mile Creek by the adjacent highways and developments. Instead of naturally flowing into the creek, water from the park is routed through the municipal stormwater system and outfalls via culverts into the creek. The excavated ponds within the park are part of the municipal stormwater system, and they are connected by a network of culverts. Approximately 190 acres, mostly from the Parklawn neighborhood, flow into Pond 1 on the east side of the park. Culverts convey the water from Pond 1 through the ponds in the proposed bank site, then out of the park southward through Pond 6. Untreated runoff also enters the proposed bank site from Sedum Lane via a curb cut in the Kellogg Avenue cul-de-sac, and the parking lot behind 4700 West 77th Street drains into the bank site via a culvert into Wetland 10. Finally, many of the playing surfaces of the former golf course are underlain by stabilization fabric and a network of shallow drains that outlets to the ponds. Flooding is a common problem within Fred Richards Park and the surrounding neighborhoods. According to the Pentagon Park/Border Basin Regional Stormwater Management Plan (2018), high water levels in Nine Mile Creek during the 10- and 100 year flood events, create high tailwater elevations that exceed the natural ground surface within Fred Richards Park and cause widespread flooding within the park and the surrounding neighborhoods. Hydrologic monitoring of the ponds in Fred Richards Park was conducted in 2018 during the growing season. 2018 was an average water year in which the park area received approximately 19.60 inches from May through September. Surface water data from this study indicates that most of the ponds within the proposed bank site functioned as a single water body.

They had nearly identical surface water elevations that averaged between 818.45 to 818.48 feet NAVD during the course of the study. The control elevation for this series of ponds is maintained by the outlet in Pond 6 at an elevation of 818.2 feet, according to data obtained from the City. Furthermore, monitoring data from two groundwater wells showed that the groundwater was consistently within 2 feet of the ground surface during the growing season. More significantly, the groundwater elevations in the wells were consistently higher than the surface water level of the ponds which suggests that the ponds are groundwater depression wetlands that receive a significant amount of baseflow from groundwater.

CURRENT LAND USES: Fred Richards Park is located northeast of the MN-100 and I-494 interchange in Edina, Minnesota. The park is a former municipal golf course that was closed in 2014 and is slowly acquiring other uses dictated by a master planning process undertaken in 2016. The master plan identified major uses of the future park as nature immersion, community gathering spaces, and flexible open spaces for recreation and relaxation. Since the golf course closed, a segment of the Nine Mile Creek Regional Trail was constructed through the park in 2016. The Three Rivers Park District holds a twenty-foot easement along the trail corridor. In 2019, a playground and park shelter was built on the east end of the park adjacent to Parklawn Avenue. A clubhouse and a parking lot are located in the southeastern corner of the park. The clubhouse currently hosts a summer art camp run by the Parks & Recreation Department and a water treatment plant is located in the complex as well. A water main and a sanitary sewer line run north from the treatment plant in alignment with Kellogg Avenue. These utilities are tangent to the eastern border of the proposed wetland bank easement, and they will be avoided during construction. The park also contains several excavated ponds which served a dual function as stormwater basins and water hazards for the golf course. The ponds are connected by a series of culverts that range in size from 6 to 85 inches. South of the park is the business district known as Pentagon Office Park. Several plats within the business park are being re-developed as high rise condominiums with enhanced green spaces. Two neighborhoods of single family homes, Lake Edina and South Cornelia, border the park on the north, and Parklawn, a neighborhood of mixed businesses and apartment buildings, extends to the east. Public access to the park is limited to four points; the regional trail access from the west, the Kellogg Avenue cul-de-sac from the north, the clubhouse parking lot at the southeast corner, and Parklawn Avenue which borders the park on the east.

COORDINATION WITH RESOURCE AGENCIES: The Corps is coordinating this proposal with the following members of the Interagency Review Team (IRT) and other resource agencies: the Minnesota Department of Natural Resources, U.S. Environmental Protection Agency, and the Minnesota Board of Water and Soil Resources.

3. FEDERALLY-LISTED THREATENED OR ENDANGERED WILDLIFE OR PLANTS OR THEIR CRITICAL HABITAT

Hennepin County is within the known historic range for the following Federally-listed species.

Northern Long-eared Bat - *Myotis septentrionalis* (Endangered)
Tricolored Bat - *Perimyotis subflavus* (Proposed Endangered)
Whooping Crane - *Grus americana* (Experimental Population, Non- Essential)
Monarch Butterfly - *Danaus plexippus* (Candidate)
Rusty Patched Bumble Bee - *Bombus affinis* (Endangered)

The Corps is coordinating this notice with the U.S. Fish and Wildlife Service. The Corps will consider any comments it may have concerning Federally-listed threatened or endangered wildlife or plants or their critical habitat in our final assessment of the described work.

4. JURISDICTION

The Corps is reviewing this proposal in accordance with the practices for documenting Corps jurisdiction under Sections 9 & 10 of the Rivers and Harbors Act of 1899 and Section 404 of the Clean Water Act.

5. HISTORICAL/ARCHAEOLOGICAL

The Corps has consulted the latest version of the National Register of Historic Places and determined that no listed properties (known to be eligible for inclusion, or included in the Register) are located in the project area. The Corps will consider the potential effects of the project on any unidentified cultural resources and/or historic properties. The Corps will coordinate if required its determination on identification of historic properties and any effect findings with the State Historic Preservation Officer and other consulting parties as appropriate independent of this public notice. The Corps will resolve any adverse effects on historic properties in coordination with consulting parties prior to the Corps' authorization of the work in connection with this project.

6. PUBLIC HEARING REQUESTS

Any person may request, in writing, within the comment period specified in this notice, that the Corps hold a public hearing to consider this proposal. Requests for public hearings shall state, in detail, the reasons for holding a public hearing. The Corps may deny public hearing request(s) if substantive reasons for holding a hearing are not provided or if there is otherwise no valid interest to be served.

7. REPLIES/COMMENTS

The Corps invites interested parties to submit written facts, arguments, or objections by the expiration date above. These statements should bear upon the suitability of the location and the adequacy of the project and should, if appropriate, suggest any changes believed to be desirable. The Corps will forward comments received to the sponsor and consider all comments during our evaluation. Interested parties can find a copy of the full prospectus in the RIBITS Cyber Repository at the following link:

https://ribits.ops.usace.army.mil/ords/f?p=107:278:15315426506373::::P278_BANK_ID:6747

Comments can be electronically submitted to evan.j.ingebriktson@usace.army.mil

If electronic submittal is not available, commenters should address replies to:

Regulatory Division
St. Paul District Corps of Engineers
332 Minnesota Street, Suite E1500
St. Paul, MN 55101-1323

Or, IF YOU HAVE QUESTIONS ABOUT THE PROJECT, call Evan Ingebriktson at the Brainerd office of the Corps, telephone number 651-290-5765

To receive Public Notice notifications, go to: <https://www.mvp.usace.army.mil/Contact/RSS/> and subscribe to the RSS Feed for which you would like to receive Public Notices.

Enclosures: 2016-03845-EJI; Fred Richards Park Wetland Bank, Public Notice Figures 1-17.



Figure 2. Easement Boundary Map

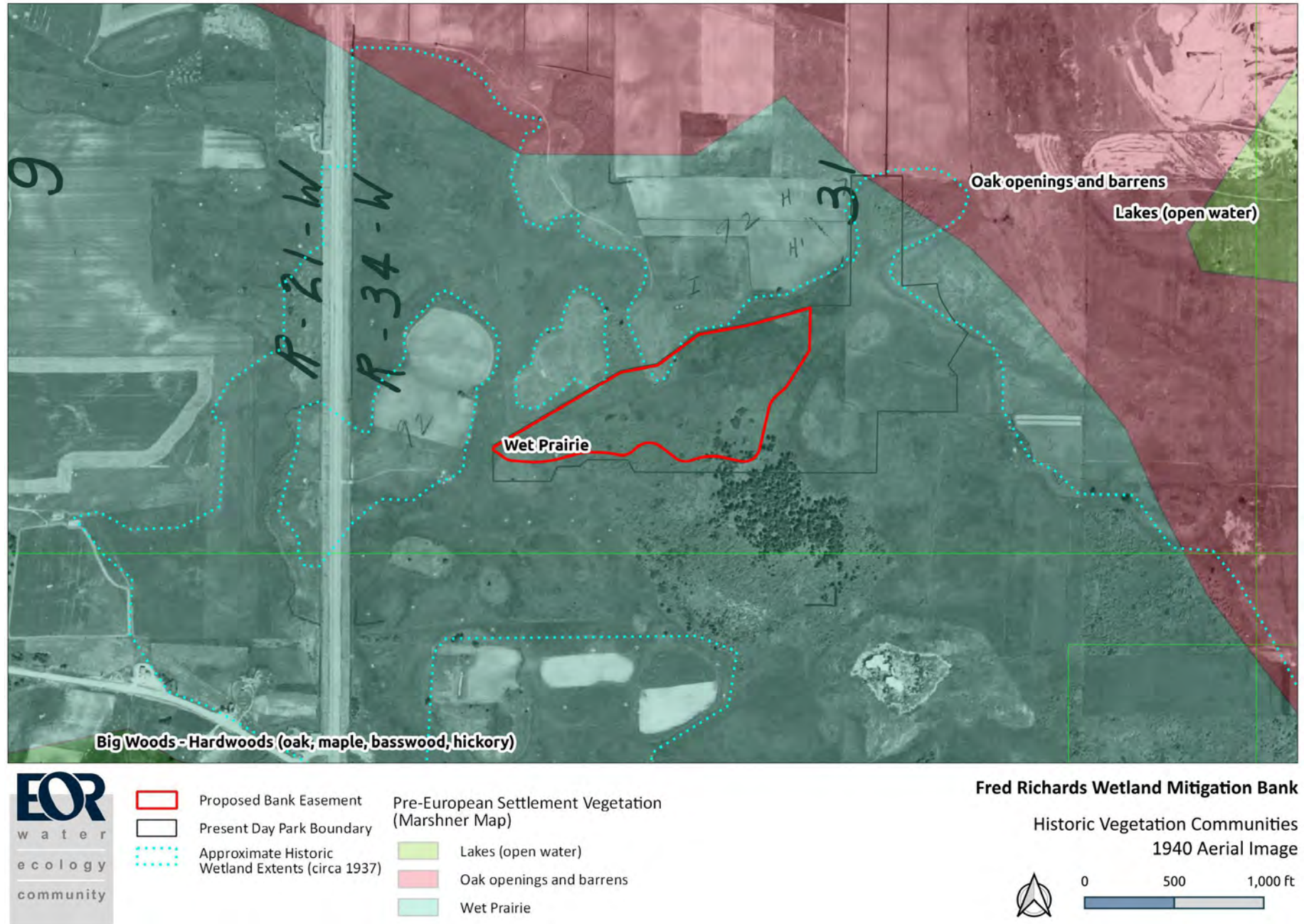
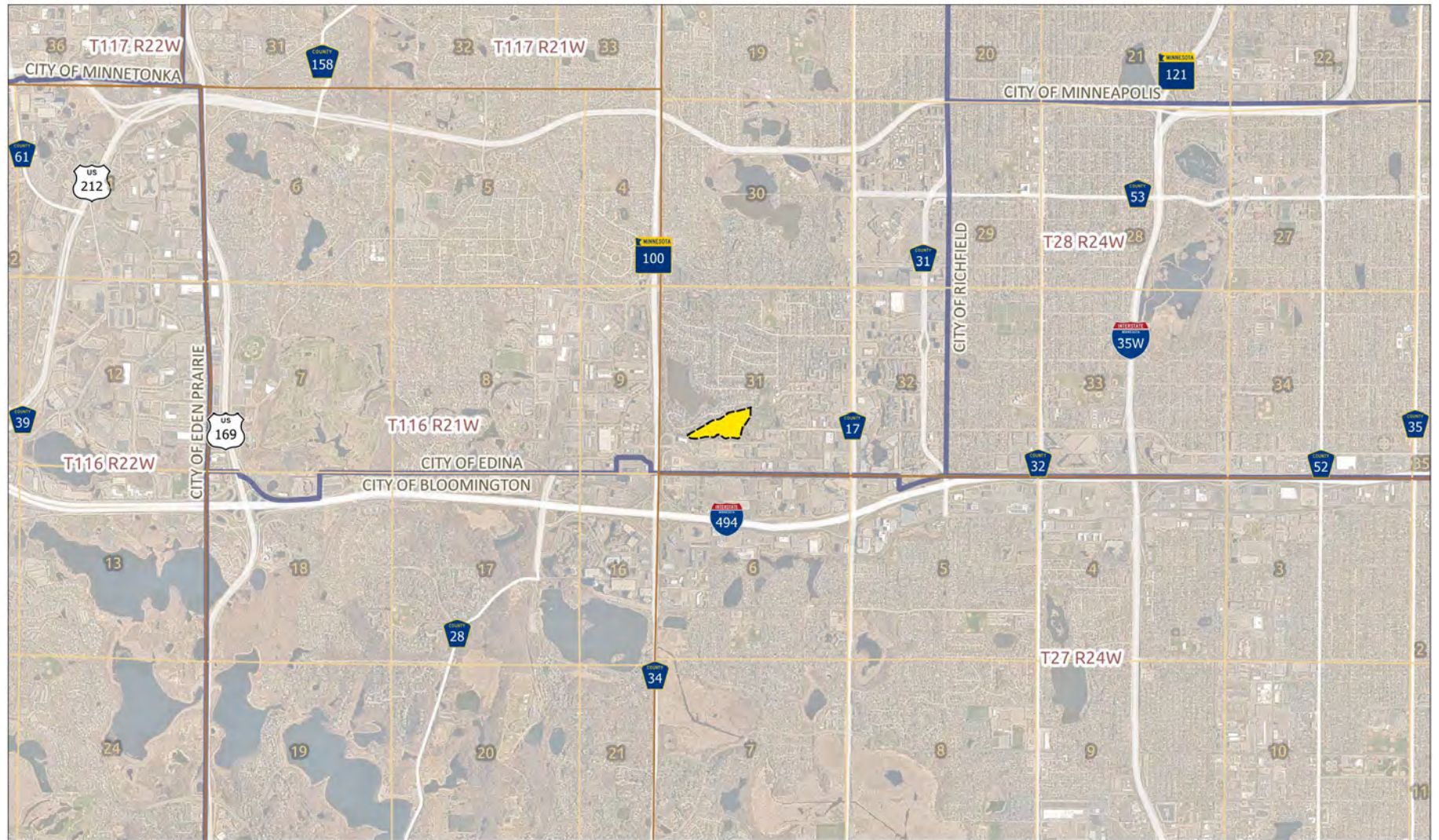


Figure 3. Historic Vegetation Communities



-  Project Area
-  Municipal Boundary
-  PLSS Section
-  PLSS Township

Fred Richards Wetland Mitigation Bank

Location

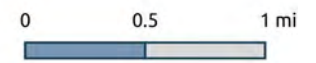


Figure 4. Location Map

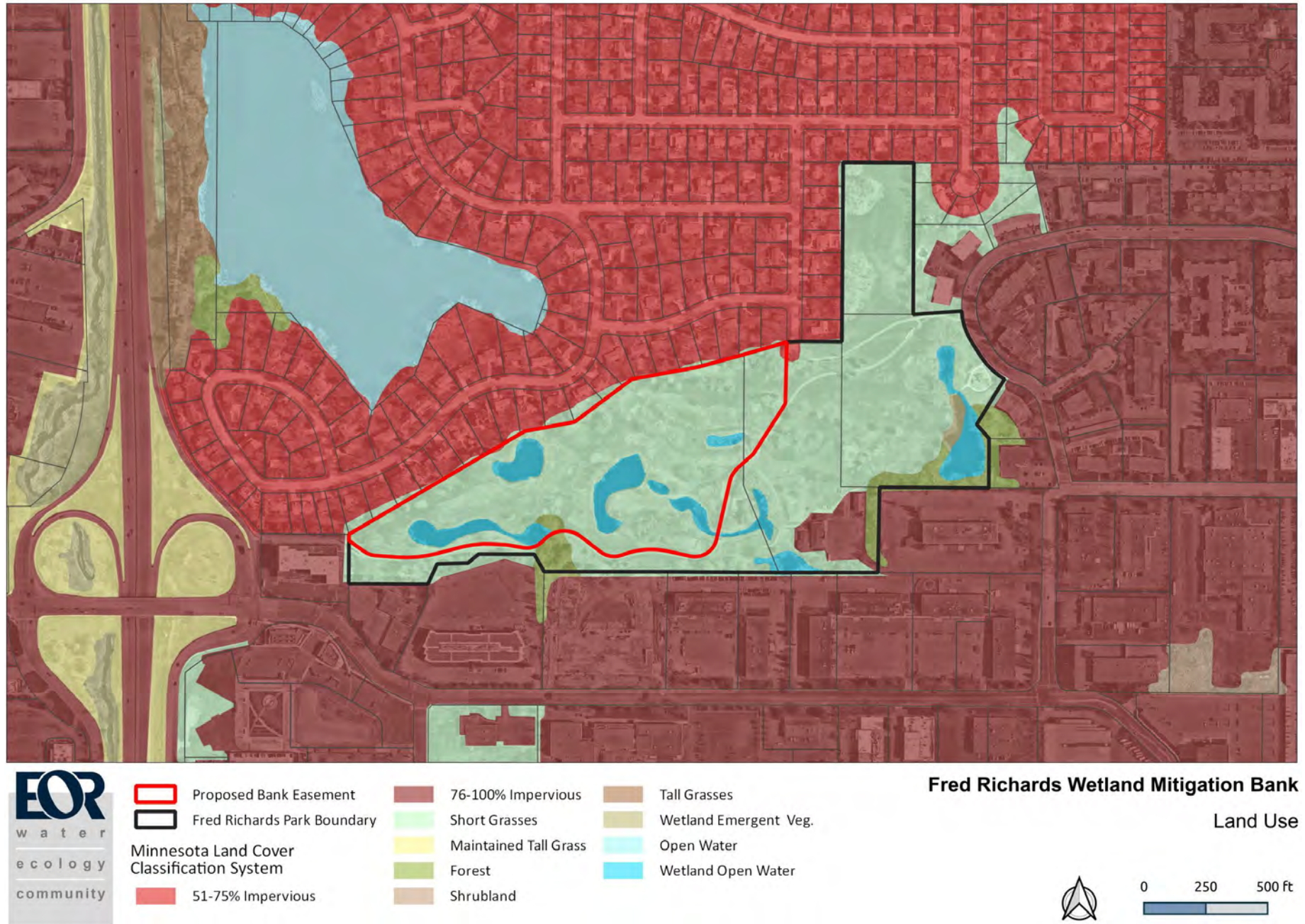


Figure 5. Land Use Map



- Proposed Bank Easement
 - Fred Richards Park Boundary
- Existing Vegetation Communities
- Dense Herbaceous Weeds

- Shallow Open Water
- Parkland
- Floodplain Forest

- Shrubland (Willow-Dominated)
- Wet Meadow (Turf Grass Dominated)
- Emergent Marsh
- Shrubland (Buckthorn-Dominated)

Fred Richards Wetland Mitigation Bank

Existing Vegetation

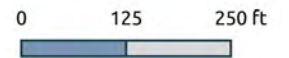
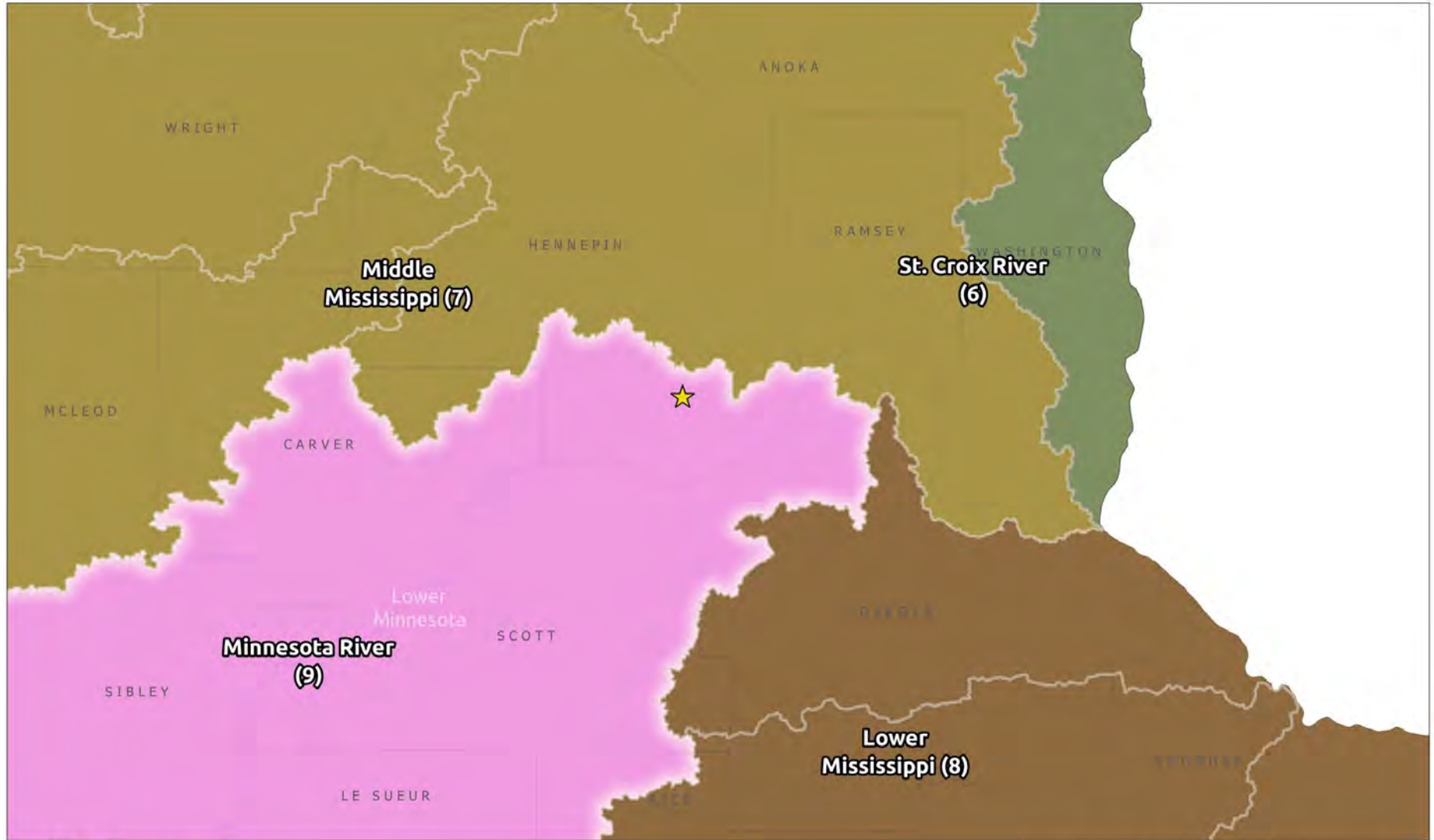


Figure 6. Existing Vegetation Communities



- ★ Project Location
- Lower Mississippi
- Wetland Bank Service Areas
- Minnesota River
- St. Croix River
- Major Watershed
- Middle Mississippi

Fred Richards Wetland Mitigation Bank

Bank Service Area and Major Watershed

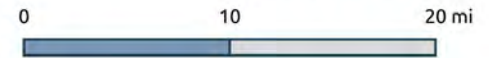
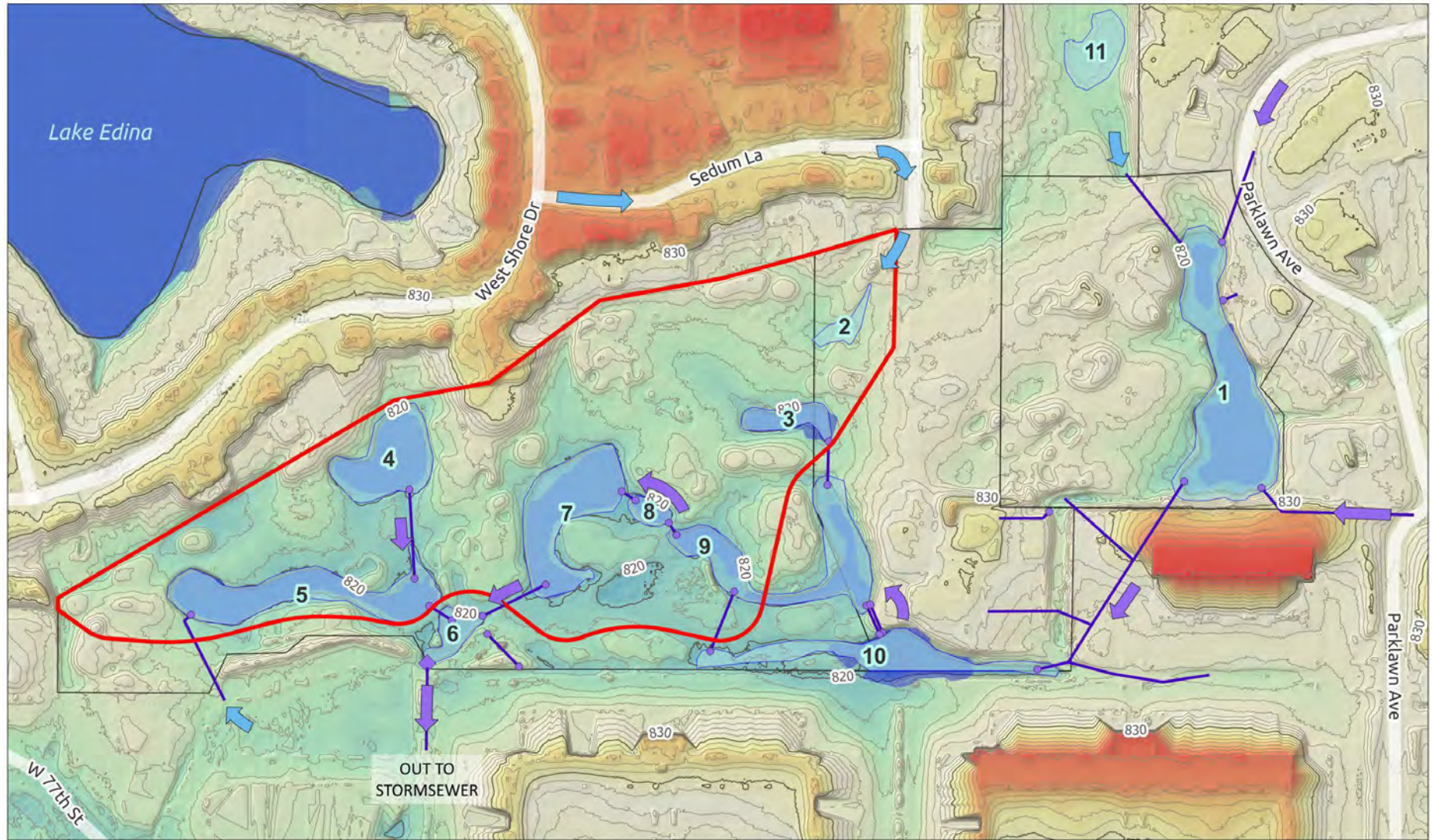


Figure 7. Bank Service Areas and Major Watersheds.



- Proposed Bank Easement
- Fred Richards Park Parcels
- Wetlands (NWI)
- Delineated Wetlands (2023)
- Public Water (Lake Edina)

- Stormwater System
- Inlet/Outlet
- Flow Paths**
- ➔ runoff
- ➔ stormsewer flow

1-Foot Contours (LiDAR-derived)

- Index
- Intermediate

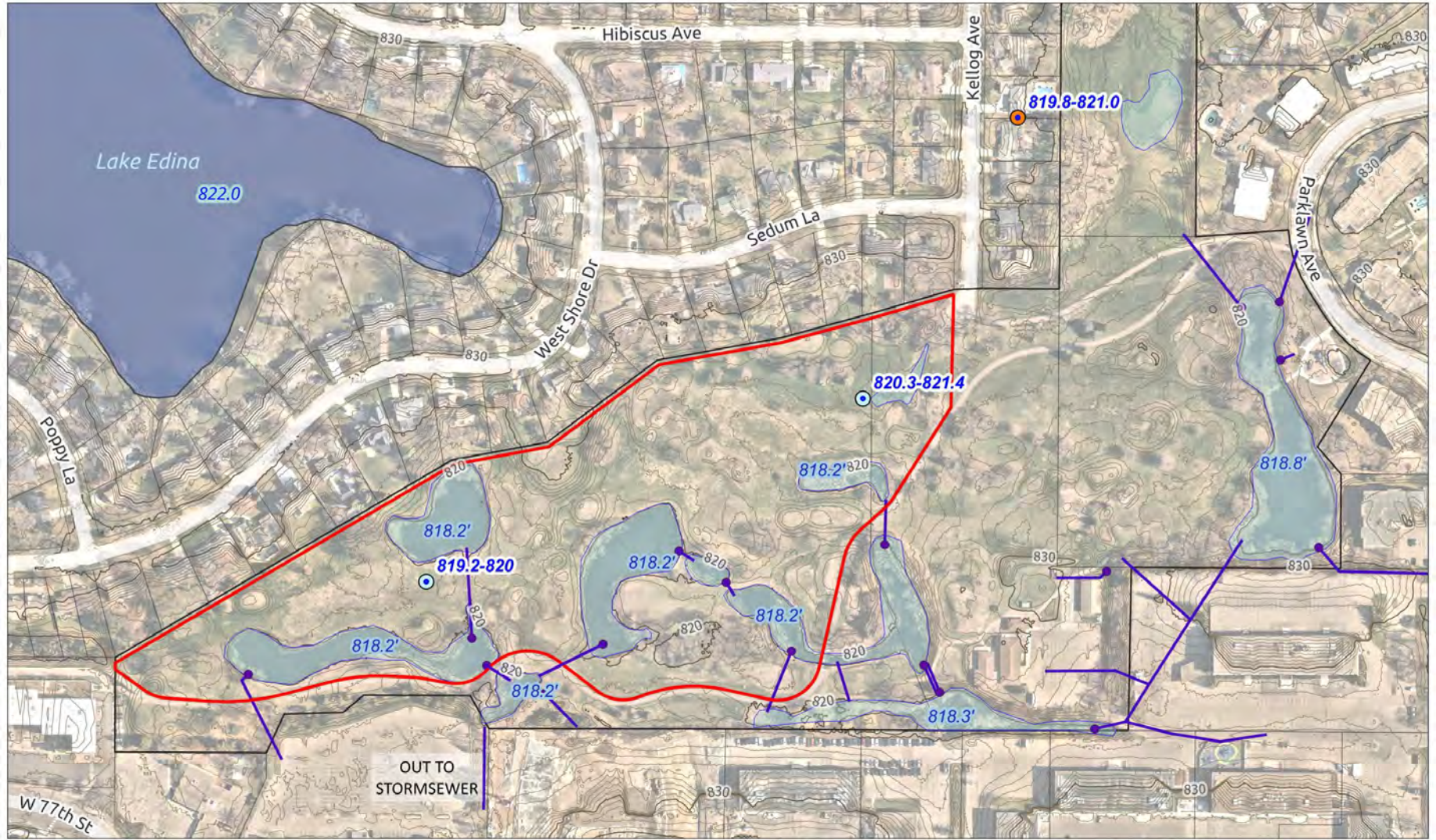
Elevation

Low High

Fred Richards Wetland Mitigation Bank

Existing Hydrology & Topography

Figure 8. Existing Wetlands, Hydrology, and Topography Map



- Proposed Bank Easement
- Fred Richards Park Parcels
- Delineated Wetlands (2023)
- Public Water (Lake Edina)
- Stormwater System
- Inlet/Outlet
- 2018 Hydrologic Study
- NMCWD Well #26
- Aggregated Groundwater Data
- 2018 Hydrologic Study
- NMCWD Well #26
- 1-Foot Contours (LiDAR-derived)
- Index
- Intermediate

Fred Richards Wetland Mitigation Bank

Groundwater/Surface Water Elevations

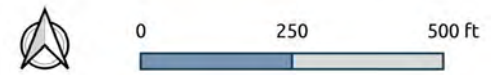
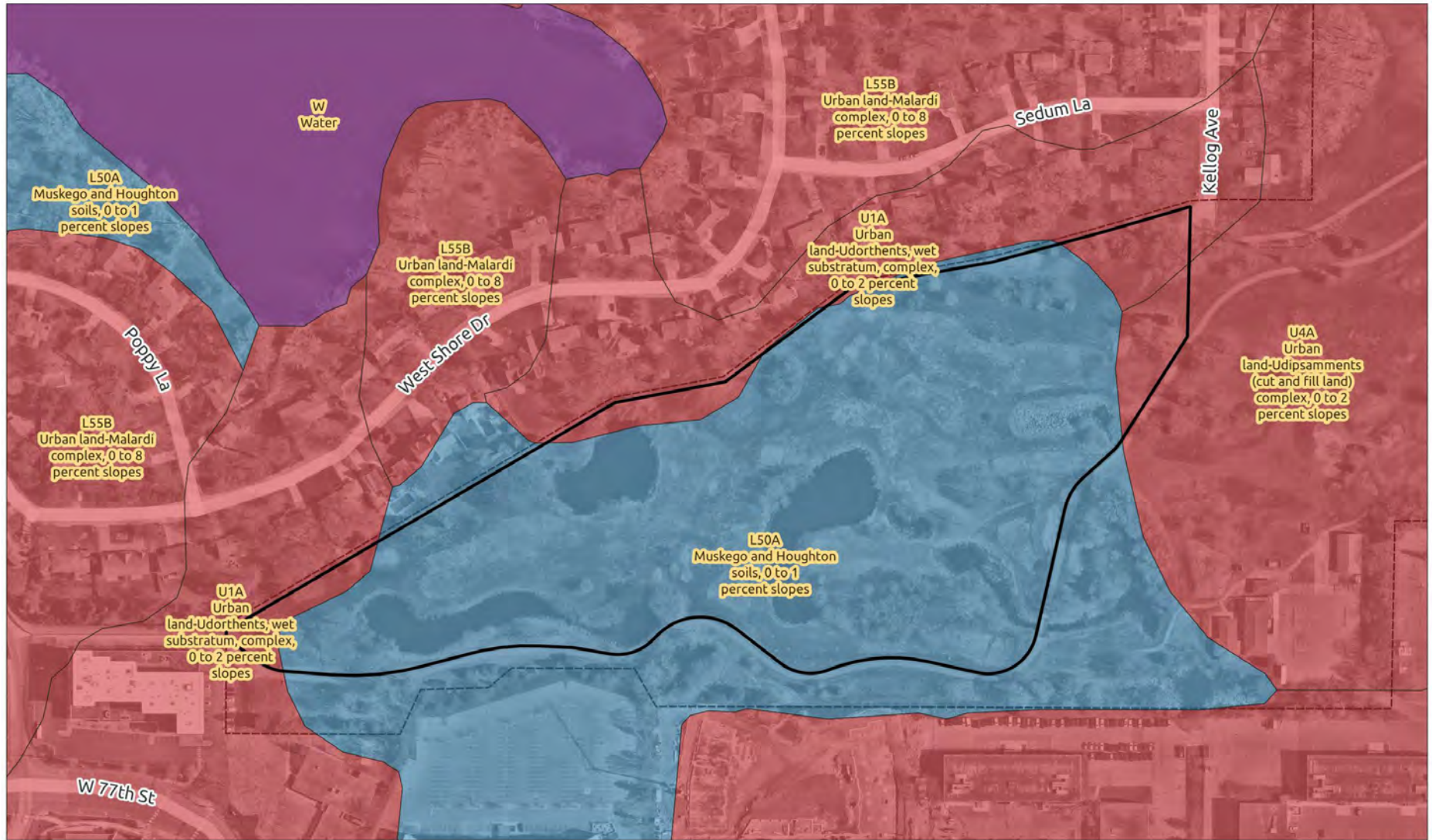


Figure 9. Aggregated Surface and Groundwater Elevation Data



- Proposed Bank Easement
- Partially Hydric
- Not Hydric
- Predominantly Hydric
- Predominantly Not Hydric
- Hydric
- Water

Fred Richards Wetland Mitigation Bank

Soils

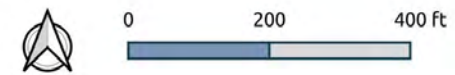


Figure 10. Soils hydric rating



- Park Boundary
- Proposed Bank Easement
- Golf Course Fills

Geotechnical Studies

- 2024 - Fred Richards Park Improvements (Braun)
- 2017 - Limited Phase II Investigation (Barr)
- 2014 - Nine Mile Creek Regional Trail Soil Borings (Braun)
- 1992 - Normandale GC Geotechnical Evaluation (Braun)

Fred Richards Wetland Mitigation Bank

Fill Soil Analysis

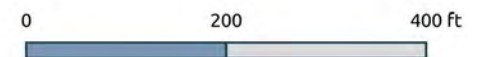


Figure 11. Analysis of golf course fills.

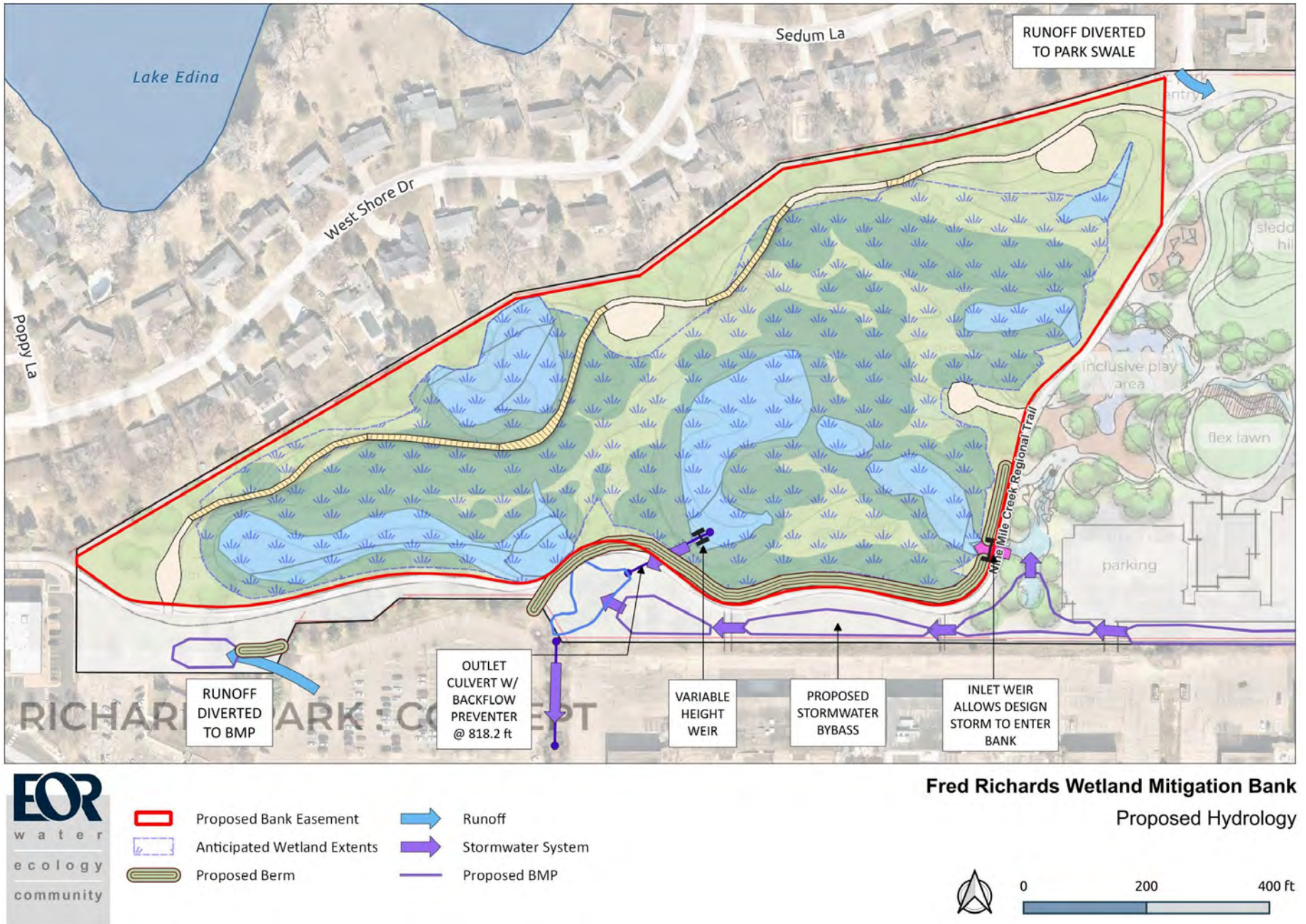


Figure 12. Proposed Hydrology

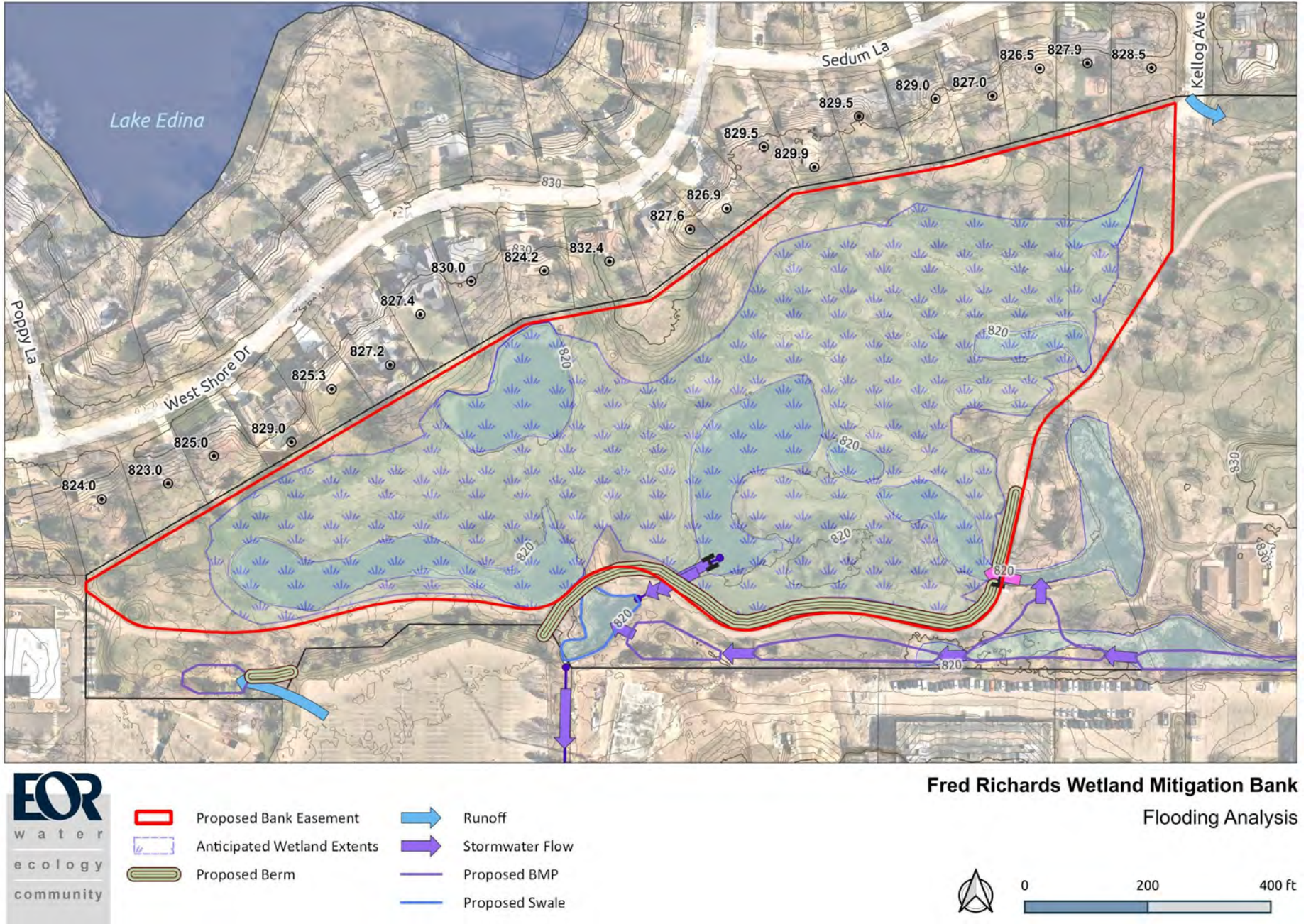


Figure 13. Flooding Analysis



- Proposed Bank Easement
- Bank Buffer - Combination of vegetation, berming, and signage
- Anticipated Wetland Extents
- Park Buffer - Vegetation and berming with select entry points

Fred Richards Wetland Mitigation Bank
Access and Buffer Plan



Figure 14. Access and Buffer Plan

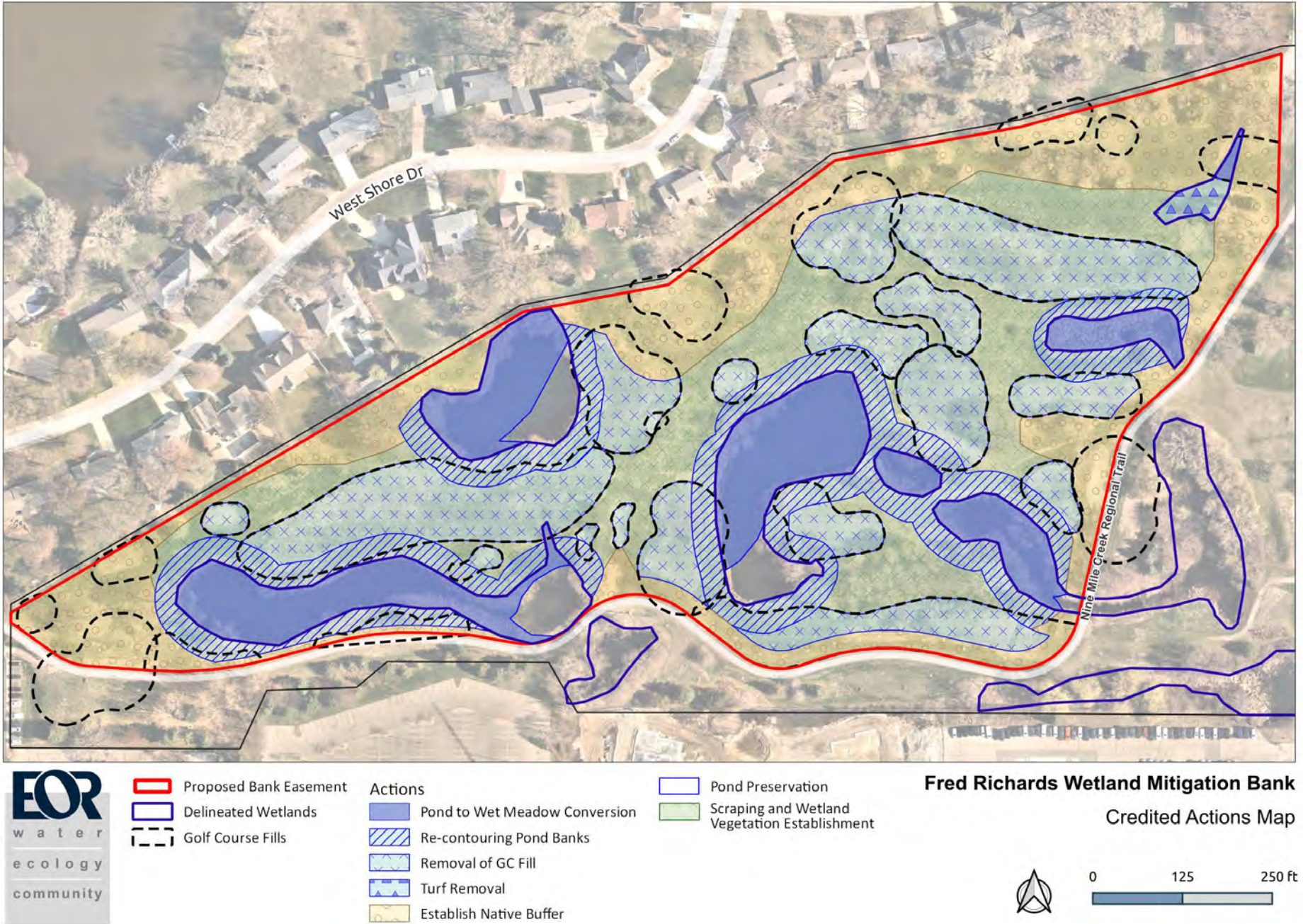
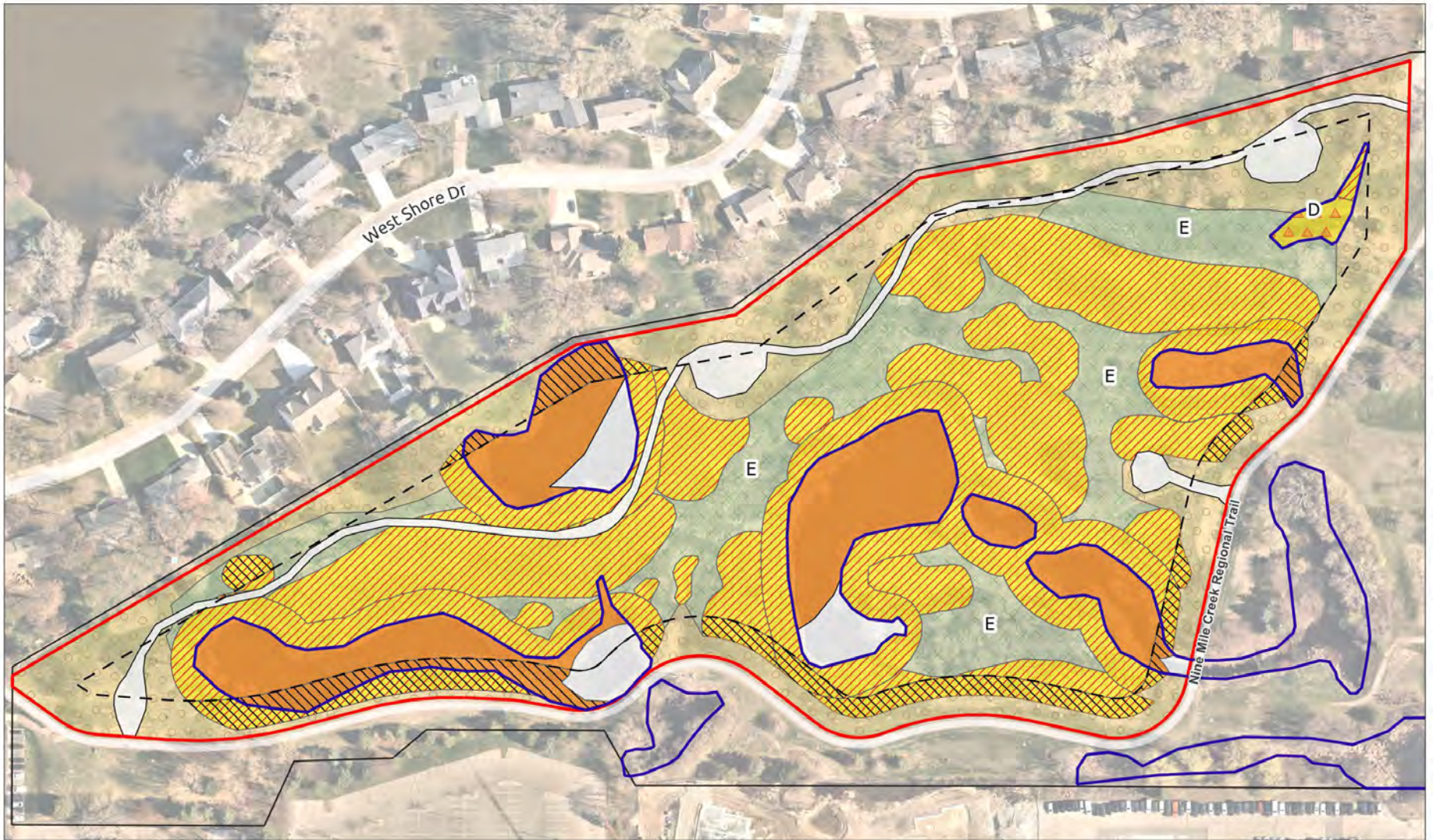


Figure 15. Restoration Actions Map



- Proposed Bank Easement
- 50-ft Buffer
- Delineated Wetland
- Crediting Zones (WCA/Corps)**
- A - Native Upland Buffer (unmanicured)
- B - 8420.0526 subp.3/Restoration via Re-Establishment

- C - 8420.0526 4B/Restoration via Rehabilitation
- D - Vegetative Restoration in Delineated Wetland/Enhancement
- E - Vegetative Restoration on Uncredited Scrape
- No Credits: Trail or Preserved Pond
- Decreased Credit Zone

Fred Richards Wetland Mitigation Bank
Credit Allocation Map



Figure 16. Credit Allocation Map



- Proposed Bank Easement
- Proposed Habitats
 - Mesic Prairie/Savannah
 - Wet Prairie/Wet Meadow
 - Deep Marsh

Fred Richards Wetland Mitigation Bank
Habitat Layout

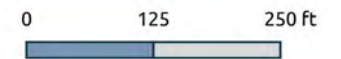
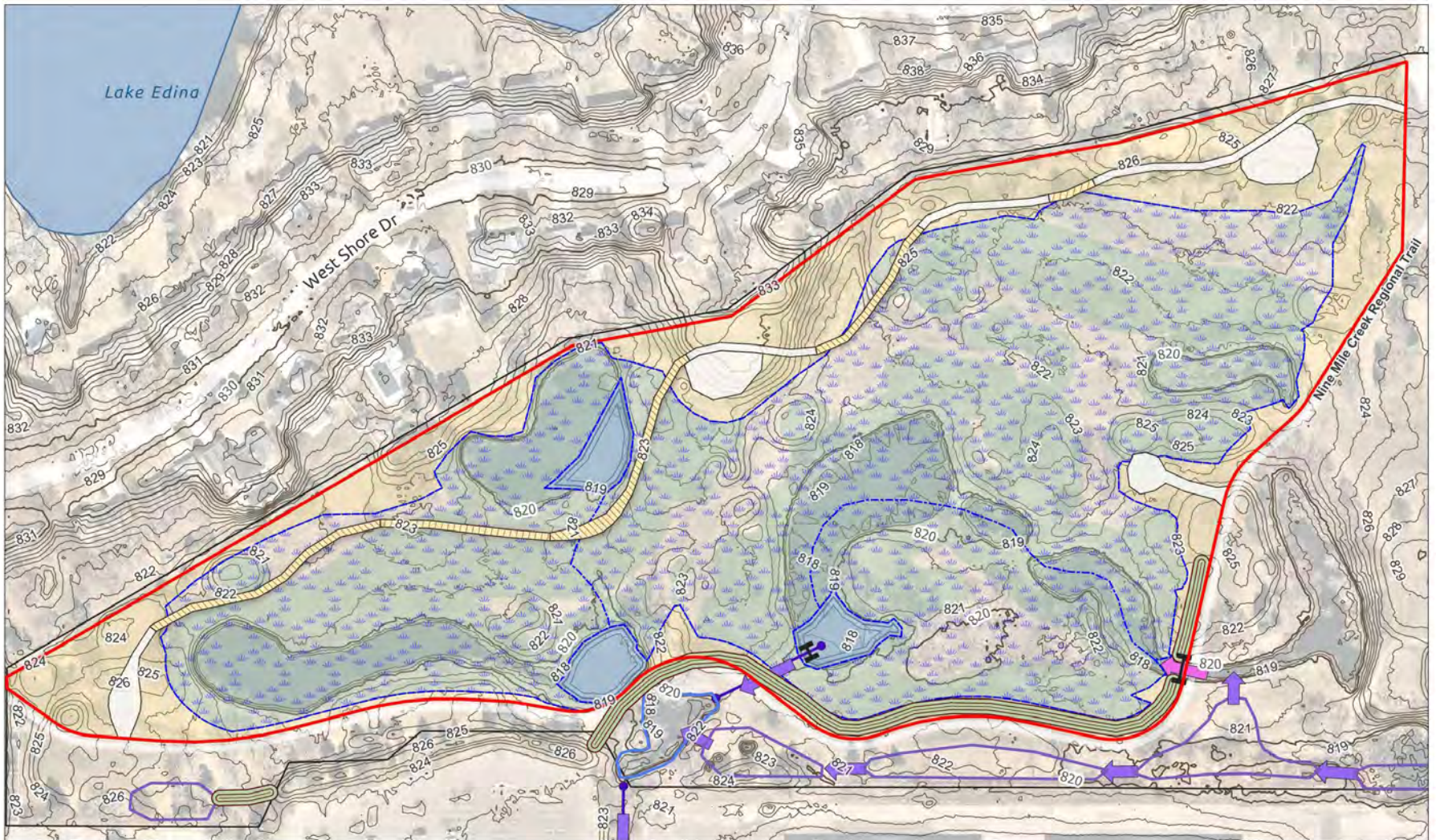


Figure 17. Proposed Habitats



- | | | | |
|--|-----------------------------|--|------------------------|
| | Fred Richards Park Boundary | | Water Control Elements |
| | Proposed Bank Easement | | berm |
| | Upland Buffer | | weir |
| | Wet Prairie/Wet Meadow | | |

**Fred Richards Wetland Mitigation Bank
Concept Plan**

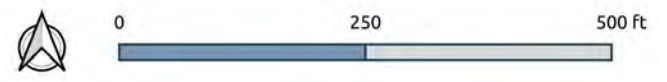


Figure 18. Concept Plan