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August 16, 2024

Mr. Brian Corcoran
Vadnais Lake Watershed Management Organization
800 County Road E East
Vadnais Heights, MN 55127
brian.corcoran@vlawmo.org

Re: **Response to TEP Comments – Vadnais Heights Apartments Wetland Replacement Plan (LGU file 7.2024)**
Vadnais Heights, Minnesota

Dear Mr. Corcoran,

On behalf of Rueter Walton, Braun Intertec has responded below to the TEP comments on the Vadnais Heights Apartments Wetland Replacement Plan. Each number in the list below corresponds to the comments received in Findings Regarding the Vadnais Heights Apartments (Replacement Plan) Project, Project No. 7.2024, dated August 12, 2024.

Avoidance:

1. TEP has determined the applicant's August 9th response as acceptable, and that the project is achievable with industry accepted engineering controls and satisfies MN Rules 8420.0520 Subp. 3.C(2)(a).
2. Applicant's August 9th response demonstrates and is consistent with reasonable requirements for public health, safety, and welfare under MN Rules 8420.0520 Subp. 3.C(2)(c).

The proposed 2-4 feet of fill (and associated building, drive aisles, and surface parking) within the proposed 0.50 acres of wetland impacts would not affect groundwater storage. The proposed stormwater management pond is located within groundwater and will not negatively affect (by volume displacement) the existing groundwater storage and quality of the existing condition. The proposed stormwater pond provides equal function and value for groundwater and surface water storage for existing and proposed conditions. This is demonstrated in the stormwater management summary of the application.

3. Additional information for the three alternative sites is provided below:
 - 0 Highway 61 (100.2 acres; PID 343022320007): Expansive wetlands and one large contiguous parcel.
The 100+ acre site identified along Willow Lake Blvd/Hwy 61 is owned by HB Fuller as part of their corporate campus. They have confidential plans for use of their entire campus and the subject property is zoned/guided Industrial. Given its location, predominantly surrounded by industrial uses, adding additional residential units to the area does not fit with the City or HB Fuller's future land use plans.

- 0 Unassigned Address (2.69 acres; PID 323022140129): City owned and not interested in selling. Not buildable (existing stormwater pond). Approximately 1.39 acres of the parcel is an existing stormwater management pond, leaving 1.30 acres of upland and wetland areas. The City is exploring potential uses that address stormwater and wetland preservation efforts in the immediate area. Page 35 of the attached *East Vadnais Lake Subwatershed Water Quality/Flood Resilience Study (dated April 2024, SRF)* shows a rendering of the proposed projects on the mentioned parcel. Page 39 shows how the City intends to turn the space into a natural park surrounding the existing stormwater ponds.
- 0 Unassigned Address (11.45 acres; PID 323022110044): City owned and not interested in selling. Not buildable (existing wetlands). Parcel is landlocked and approximately 5.9 acres of the parcel is wetland. The City is exploring potential uses that address stormwater and wetland preservation efforts in the immediate area. Page 35 of the attached *East Vadnais Lake Subwatershed Water Quality/Flood Resilience Study (dated April 2024, SRF)* shows a rendering of the proposed projects on the mentioned parcel. Page 39 shows how the City intends to turn the space into a natural park surrounding the existing stormwater ponds.

The application materials and August 9th response demonstrates that a feasible and prudent alternative site does not exist to meet the project’s purpose and need pursuant to MN Rules 8420.0520 Subp. 3.C(3)(a).

4. The application materials and August 9th response demonstrated a second alternative with reasonable modifications to the size, scope, and configuration or density of the project, and a discussion as to why this second alternative is not feasible. For illustrative purposes, the second alternative is shown on the attached figure (Alternative #2), showing approximately 0.25 acres of buildable upland when considering structure lot line setbacks of 10 feet from Arcade Street and 35 feet from side lots. Information provided by the applicant satisfies MN Rules 8420.0520 Subp. 3.C(3)(c).
5. TEP has determined the August 9th response as acceptable, and that the project satisfies MN Rules 8420.0520 Subp. 3.C(3)(d).
6. TEP comment of “its location within the City and its natural condition” needs clarification and reference to a geographical scale within the City; Wetland A’s proximity to other wetlands? the upstream drainage area of Wetland A? or it pertains to something else? TEP comment is misleading to assume stormwater ponds do not have similar or same individual functions and values as wetlands.

The applicant’s proposed use of mitigation credit will have a net increase in wetland functions and public values than the degraded status of wetland A. Information provided by the applicant satisfies MN Rules 8420.0520 Subp. 3.C(3)(f).

Minimization:

7. Information provided by the applicant shows spatial minimization efforts to unavoidable permanent wetland impacts, resulting in reductions of 0.08 acres to Wetland A, and therefore MN Rules 8420.0520 Subp. 4.A is satisfied.
8. Other alternative locations have been provided in previous submittals (specifically, the avoidance discussion and off-site alternative analysis). The applicant has provided sufficient and reasonable project information to demonstrate the location of existing structural and natural features that dictate the site design's placement and configuration per MN Rules 8420.0520 Subp. 4.B.
9. Project purpose and need is discussed in the application and comment response #5. Minimization efforts are discussed in the application and comment response #7. Applicant has satisfied (with reasonable information) MN Rules 8420.0520 Subp. 4.C.
10. Site design has incorporated site constraints and considerations related to topography, hydrology, and existing vegetation. Minimization efforts and avoidance to potential negative groundwater impacts (comment response #2) have been provided. These items are demonstrated in the applicant's submittals to meet MN Rules 8420.0520 Subp. 4.D.
11. The low value and functionality (nutrient loading, lack of vegetation diversity, degraded habitat, and primary function as an existing stormwater management basin) of Wetland A and spatial distribution of Wetland A was considered into the design and feasible effort to minimize wetland impacts by 0.08 acres (refer to previous applicant submittals), therefore MN Rules 8420.0520 Subp. 4.E.
12. The applicant provided information showing the design parameters that would make the proposed 0.08 acre temporary wetland impacts rectifiable and post-construction wetland area functional. TEP comment response does not identify how the incorporated design parameters are "not feasible" or how the area would not remain wetland post-construction. Minimization (MN Rules 8420.0520 Subp. 4) does not apply to proposed temporary wetland impacts.
13. Duplicative comment that is addressed in comment responses #7-#9, which satisfies MN Rules 8420.0520 Subp. 4.G(1) and site considerations provided in previous submittals (MN Rules 8420.0520 Subp. 4.G(2-4)). Proposed permanent wetland impacts are located within the northwest and southeast wetland fringe. Minimization (MN Rules 8420.0520 Subp. 4) does not apply to proposed temporary wetland impacts.
14. Duplicative comment to TEP comment #12 (No-Loss). Refer to comment response #12.
15. Duplicative comment to TEP comment #12 (No-Loss). Refer to comment response #12.
16. Refer to comment responses #7-#14.

We appreciate your comments on the Vadnais Heights Apartments Wetland Replacement Plan. If you have any additional questions or would like to discuss these responses, please contact Travis Fristed at 952.995.2027/ tfrieded@braunintertec.com.

Sincerely,

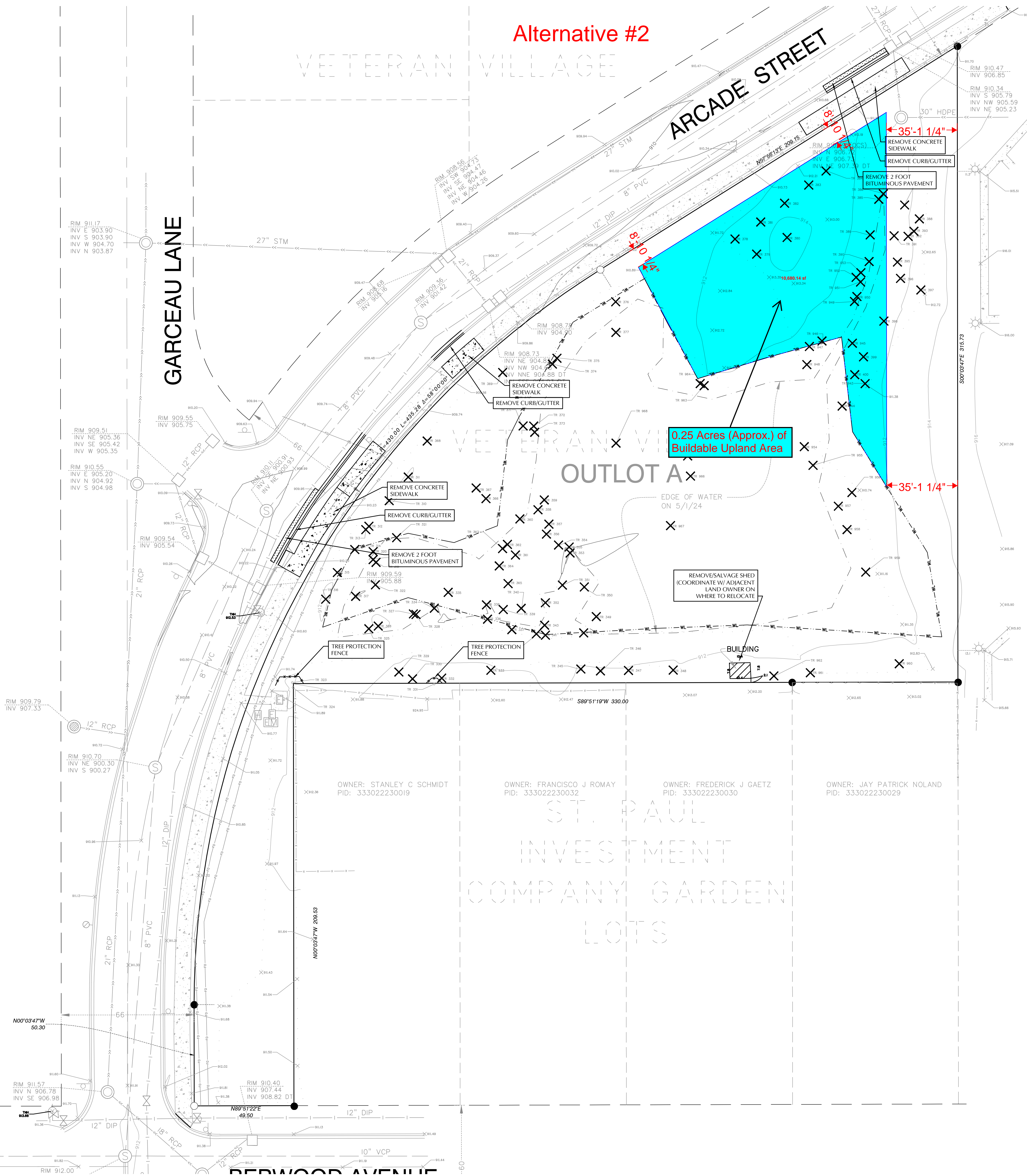
BRAUN INTERTEC CORPORATION

A handwritten signature in blue ink that reads "Travis Fristed". The signature is written in a cursive style with a long horizontal stroke at the beginning.

Travis Fristed, PWS, CMWP
Senior Manager, Principal Scientist

Attachments: Alternative #2 (Sheet C1-1 Site Demolition Plan)
East Vadnais Lake Subwatershed Water Quality/Flood Resilience Study
(dated April 2024, SRF)

Alternative #2



- SITE DEMOLITION NOTES**
- CONTRACTOR SHALL REMOVE AND/OR RELOCATE EXISTING PRIVATE UTILITIES AS NECESSARY. CONTRACTOR TO COORDINATE ACTIVITIES WITH UTILITY COMPANIES & OWNER.
 - CLEAR AND GRUB AND REMOVE ALL TREES NOTED FOR REMOVAL. VEGETATION AND SITE DEBRIS WITHIN CONSTRUCTION LIMITS PRIOR TO GRADING. STRIP TOP SOIL AND STOCKPILE ON-SITE. ALL REMOVED MATERIAL SHALL BE HAULED FROM THE SITE DAILY. ALL CLEARING AND GRUBBING AND REMOVALS SHALL BE PERFORMED PER THE CONTRACT SPECIFICATIONS. EROSION CONTROL MEASURES SHALL BE IMMEDIATELY ESTABLISHED UPON REMOVAL. SEE THE STORMWATER POLLUTION PREVENTION PLAN (SWPPP) / GRADING & EROSION CONTROL PLAN.
 - CONTRACTOR SHALL PROTECT SURFACE AND SUBSURFACE FEATURES NOT NOTED FOR REMOVAL. CONTRACTOR TO NOTIFY ENGINEER WITH ANY CONFLICTS OR PLAN DISCREPANCIES.
 - CONTRACTOR TO SCHEDULE PRE-CONSTRUCTION MEETING(S) WITH UTILITY OWNER(S) TO DISCUSS DISCONNECTIONS AND/OR RELOCATIONS.
 - REFER TO TREE INVENTORY, TREE PRESERVATION, AND TREE REPLACEMENT PLAN FOR REMOVAL AND REPLACEMENT OF ON SITE TREES.
 - CONTRACTOR TO VERIFY LOCATION OF SEPTIC FIELD(S) & WELL(S) ON SITE. COORDINATE REMOVALS AND/OR ABANDONMENT WITH THE APPLICABLE GOVERNING AGENCIES. CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING APPLICABLE PERMITS. WELLS ON THE PROPERTY SHALL BE SEALED BY A MINNESOTA DEPARTMENT OF HEALTH (MDH) LICENSED CONTRACTOR.
 - BITUMINOUS PAVEMENT REMOVALS ARE TO BE MADE TO A VERTICAL SAW CUT OR TO A NEAT MILLED EDGE.
 - CONCRETE PAVEMENT, SIDEWALK, CURB & GUTTER AND OTHER POURED CONCRETE ITEMS ARE TO BE REMOVED TO AN EXISTING EXPANSION OR CONTRACTION JOINT. SAW CUT AS NECESSARY FOR A NEAT EDGE OF REMOVAL.
 - ANY DAMAGE TO ITEMS NOT NOTED TO BE REMOVED SHALL BE THE RESPONSIBILITY OF THE CONTRACTOR AND SHALL BE REPAIRED OR REPLACED TO ORIGINAL CONDITION WITH NO ADDITIONAL COMPENSATION.
 - CONTRACTOR SHALL COORDINATE ALL WORK WITHIN THE PUBLIC RIGHT OF WAY WITH THE APPLICABLE GOVERNING AGENCIES. ALL WORK SHALL BE PERFORMED PER THE REQUIREMENTS OF THE APPLICABLE GOVERNING AGENCIES.
 - CONTRACTOR TO COORDINATE ALL WORK WITHIN THE ADJACENT PROPERTIES WITH THE OWNER AND ADJACENT PROPERTY OWNER.
 - CONTRACTOR TO COORDINATE DEMOLITION PHASING WITH ALL DISCIPLINES INCLUDING BUT NOT LIMITED TO ARCHITECTURAL, STRUCTURAL, ELECTRICAL, MECHANICAL, & OWNER.
 - REFER TO THE GEOTECHNICAL REPORT PREPARED BY XXX, DATED XX, XXXX FOR INFORMATION INCLUDING BUT NOT LIMITED TO GROUNDWATER CONDITIONS AND RECOMMENDATIONS FOR EXCAVATION DEWATERING.
 - THE CONTRACTOR SHALL COORDINATE WITH THE OWNER FOR ANY REPAIRS TO THE IRRIGATION SYSTEM THAT IS AFFECTED DURING CONSTRUCTION.

- DEMOLITION LEGEND**
- REMOVE EXISTING BITUMINOUS PAVING
 - REMOVE EXISTING CONCRETE PAVING, SIDEWALKS, ETC.
 - REMOVE EXISTING CURB & GUTTER, RETAINING WALLS, FENCE, ETC.
 - REMOVE EXISTING MANHOLES, POWER POLES, LIGHT POLES, BOLLARDS, PARKING METERS, SIGNS, ETC.
 - REMOVE EXISTING TREES
 - TREE PROTECTION FENCE

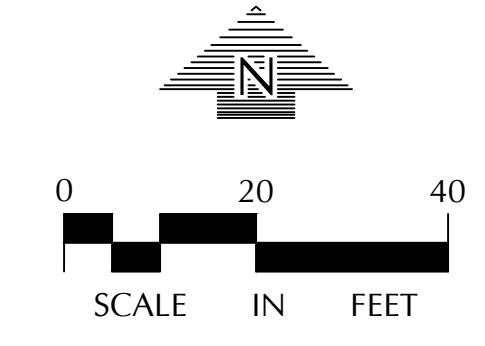
EXISTING TREE LIST (FROM ALLIANT ALTA)

Tag #	DBH	Species	Tag #	DBH	Species	Tag #	DBH	Species
310	12	White Spruce	351	7	Silver Maple	392	9	Eastern Cottonwood
311	12	White Spruce	352	8	Silver Maple	393	19	Eastern Cottonwood
312	11	White Spruce	353	8	Silver Maple	395	10	Silver Maple
313	10	Siberian Elm	354	13	Silver Maple	396	42	Eastern Cottonwood
314	9	White Spruce	355	6	Eastern Cottonwood	397	10	Eastern Cottonwood
315	9	White Spruce	356	25	Eastern Cottonwood	398	13	Eastern Cottonwood
316	15	White Spruce	357	22	Eastern Cottonwood	399	15	Eastern Cottonwood
317	21	Black Willow	358	11	Black Willow	400	12	Silver Maple
318	7	Eastern Cottonwood	359	14	Silver Maple	943	11	Silver Maple
319	15	Black Willow	360	16	Eastern Cottonwood	944	17	Silver Maple
320	8	Eastern Cottonwood	361	8	Silver Maple	945	9	Eastern Cottonwood
321	22	Black Willow	362	18	Silver Maple	946	7	Silver Maple
322	7	Black Willow	363	7	Eastern Cottonwood	947	38	Silver Maple
323	25	Siberian Elm	364	9	Silver Maple	948	7	Silver Maple
324	24	Siberian Elm	365	10	Silver Maple	949	7	Eastern Cottonwood
325	11	Black Willow	366	8	Green Ash	950	15	Eastern Cottonwood
326	15	Black Willow	367	10	Green Ash	951	7	Eastern Cottonwood
327	16	Black Willow	368	9	Green Ash	952	10	Eastern Cottonwood
328	12	Black Willow	369	9	Black Walnut	953	10	Eastern Cottonwood
329	6	Green Ash	370	8	Green Ash	954	17	Silver Maple
330	35	Eastern Cottonwood	371	8	Green Ash	955	12	Silver Maple
331	48	Eastern Cottonwood	372	7	Black Willow	956	10	Swamp White Oak
332	12	American Elm	373	14	Swamp White Oak	957	11	Swamp White Oak
333	8	Silver Maple	374	23	Eastern Cottonwood	958	12	Swamp White Oak
334	20	Silver Maple	375	7	Green Ash	959	12	Swamp White Oak
335	28	Silver Maple	376	6	Green Ash	960	28	Silver Maple
336	8	Black Willow	377	15	Black Willow	961	70	Silver Maple
337	7	Eastern Cottonwood	378	13	Colorado Blue Spruce	962	25	Green Ash
338	7	Silver Maple	379	12	Colorado Blue Spruce	963	7	Green Ash
339	8	Eastern Cottonwood	380	11	Colorado Blue Spruce	964	8	Green Ash
340	9	Eastern Cottonwood	381	11	Colorado Blue Spruce	965	19	Silver Maple
341	10	Silver Maple	382	12	Colorado Blue Spruce	966	22	Silver Maple
342	7	Bigtooth Aspen	383	13	Colorado Blue Spruce	967	6	Green Ash
343	10	Bigtooth Aspen	384	12	Colorado Blue Spruce	968	6	Green Ash
344	8	Silver Maple	385	16	Eastern Cottonwood			
345	14	Silver Maple	386	9	Eastern Cottonwood			
346	8	Bowlder	387	24	Eastern Cottonwood			
347	9	Green Ash	388	30	Silver Maple			
348	18	Silver Maple	389	6	Quaking Aspen			
349	11	Silver Maple	390	9	Eastern Cottonwood			
350	8	Silver Maple	391	23	Eastern Cottonwood			

TREE DATA:
 TOTAL TREES SURVEYED: 116 TREES
 TOTAL TREES REMOVED: 113 TREES
 TOTAL TREES SAVED: 3 TREES



WARNING:
 THE CONTRACTOR SHALL BE RESPONSIBLE FOR CALLING FOR LOCATIONS OF ALL EXISTING UTILITIES. THEY SHALL COOPERATE WITH ALL UTILITY COMPANIES IN MAINTAINING THEIR SERVICE AND / OR RELOCATION OF LINES.
 THE CONTRACTOR SHALL CONTACT GOPHER STATE ONE CALL AT 651-454-0002 AT LEAST 48 HOURS IN ADVANCE FOR THE LOCATIONS OF ALL UNDERGROUND WIRES, CABLES, CONDUITS, PIPES, MANHOLES, VALVES OR OTHER BURIED STRUCTURES BEFORE DIGGING. THE CONTRACTOR SHALL REPAIR OR REPLACE THE ABOVE WHEN DAMAGED DURING CONSTRUCTION AT NO COST TO THE OWNER.



ARCADE ST. APARTMENTS
 VADNAIS HEIGHTS, MN

REUTER WALTON DEVELOPMENT
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CADD QUALIFICATION
 CADD files prepared by the Consultant for this project are prepared by the Consultant professional services for use solely with respect to this project. These CADD files shall not be used on other projects. The Consultant shall not be responsible for the accuracy of the CADD files. The Consultant shall not be responsible for the accuracy of the CADD files. The Consultant shall not be responsible for the accuracy of the CADD files.

SUBMITTAL/REVISIONS

Date	Description
06/27/24	CITY SUBMITTAL
07/19/24	WETLAND COMMENTS

PROFESSIONAL SIGNATURE
 I hereby certify that this plan, specification or report was prepared by me or under my direct supervision and that I am a duly Licensed Professional Engineer under the laws of the State of Minnesota.
 License No. 49933
 Date: 06/27/24

QUALITY CONTROL

Locks Project No.	24180
Project Lead	PJD
Drawn By	DOL
Checked By	PJD
Review Date	07/19/24

SHEET INDEX

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C3-3	SWPPP NOTES
C4-1	SANITARY AND WATERMAIN
C4-2	STORM SEWER PLAN
C8-1	CIVIL DETAILS
C8-2	CIVIL DETAILS
L1-1	LANDSCAPE PLAN
L2-1	LANDSCAPE DETAILS

SITE DEMOLITION PLAN
C1-1