

# KJOLHAUG ENVIRONMENTAL SERVICES COMPANY

*Providing Sound, Balanced, Comprehensive Natural Resource Solutions*

## Memorandum

**Date:** May 16, 2025

**To:** Andrew Boucher, City of Columbia Heights (LGU)

**CC:** Todd McLouth, Loucks, Inc.

**From:** Faith Holaday, Kjolhaug Environmental Services (KES)

**Re:** Site Assessment and No-Loss/Incidental Determination  
**800 53<sup>RD</sup> AVENUE NE, COLUMBIA HEIGHTS KES# 2025-052**

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The 11.7-acre site at 800 53<sup>rd</sup> Avenue NE was inspected on April 22, 2025 for the presence and extent of wetlands by Kjolhaug Environmental Services (KES). No wetlands were identified or delineated on the property.

The site was located in Section 26, Township 30 North, Range 24 West, City of Columbia Heights, Anoka County, Minnesota. The site was situated approximately 1500 ft south of I-694, 300 ft west of Central Avenue NE/MN 65, and adjacent to and south of 53<sup>rd</sup> Avenue NE (**Figure 1**). The site boundaries corresponded to Anoka County PID 26-30-24-11-0020.

The site consisted of a parking lot, office building, meadow, lawn, and planted trees. The topography at the site sloped from a high of 898-ft MSL in the northwest and northeast portions of the site to a low of 886-ft MSL in the central and southeast portions of the site. Surrounding land use was commercial and residential. Existing conditions are shown on **Figure 2**.

**Appendix A** of this memo includes a Joint Application Form for Activities Affecting Water Resources in Minnesota, which is submitted to the City of Columbia Heights to request concurrence with the No-Loss/Incidental determinations under the Minnesota Wetland Conservation Act (WCA).

### **Wetland Delineation Methodology**

Wetlands were identified using the Routine Determination method described in the Corps of Engineers Wetlands Delineation Manual (Waterways Experiment Station, 1987) and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest Region (Version 2.0) as required under Section 404 of the Clean Water Act and the Minnesota Wetland Conservation Act.

Wetland boundaries were identified as the upper-most extent of wetland that met criteria for hydric soils, hydrophytic vegetation, and wetland hydrology. Wetland-upland boundaries were marked with pin flags that were located with a sub-meter accuracy GPS unit.

Soils, vegetation, and hydrology were documented at a representative location along the wetland-upland boundary. Plant species dominance was estimated based on the percent aerial or basal coverage visually estimated within a 30-foot radius for trees and vines, a 15-foot radius for the shrub layer, and a 5-foot radius for the herbaceous layer within the community type sampled.

Soils were characterized to a minimum depth of 24 inches (unless otherwise noted) using a Munsell Soil Color Book and standard soil texturing methodology. Hydric soil indicators used are from Field Indicators of Hydric Soils in the United States (USDA Natural Resources Conservation Service (NRCS) in cooperation with the National Technical Committee for Hydric Soils, Version 8.2, 2010).

Mapped soils are separated into five classes based on the composition of hydric components and the Hydric Rating by Map Unit color classes utilized on Web Soil Survey. The five classes include Hydric (100 percent hydric components), Predominantly Hydric (66 to 99 percent hydric components), Partially Hydric (33 to 65 percent hydric components), Predominantly Non-Hydric (1 to 32 percent hydric components), and Non-Hydric (less than one percent hydric components).

Plants were identified using standard regional plant keys. Taxonomy and indicator status of plant species was taken from the 2020 National Wetland Plant List (U.S. Army Corps of Engineers 2020. National Wetland Plant List, version 3.3, Engineer Research and Development Center, Cold Regions Research and Engineering Laboratory, Hanover, NH).

**Review of NWI, Soils, DNR, and NHD Information**

The National Wetlands Inventory (NWI) (Minnesota Geospatial Commons 2009-2014 and U.S. Fish and Wildlife Service) showed a PEM1C/PUBG wetland approximately 100 ft west of the site (**Figure 3**).

The Soil Survey (USDA NRCS 2015) did not show any hydric or predominantly hydric soils within the site boundaries. Soil types mapped on or near the property are listed in **Table 2** and a map showing soil types is included in **Figure 4**.

**Table 2. Soil types present on the 800 53<sup>rd</sup> Avenue site.**

Symbol	Soil Name	Acres in AOI	Percent of AOI	% Hydric	Hydric Category
UuB	Urban land-Udorthents (cut and fill land) complex, 0 to 6 percent slopes	11.7	100	0	Non-hydric

The Minnesota DNR Public Waters Inventory (Minnesota Department of Natural Resources 2015) showed DNR Public Water Basin 02008000 P (Sandy) approximately 100 ft west of the site boundaries (**Figure 5**).

The National Hydrography Dataset (U.S. Geological Survey 2015) showed one pipeline within site boundaries along the southern site boundary. The dataset also showed a lake/pond feature corresponding to the DNR Public Water Basin and several HYDRO NET Junctions approximately 100 to the west of the site (**Figure 6**).

### **No-Wetland/Incidental Determination**

The site was examined on April 22, 2025 for potential wetlands. At the time of the visit, climatic conditions were atypical (wet) according to the Antecedent Precipitation Tool (**Appendix C**). Buds on most trees and shrubs had burst and early vegetation was actively growing at the time of the site visit.

**Area A (Figure 2)** located just south of the parking lot contained a wet spot dominated by bulrush. The area met all three wetland parameters. A **storm pond** dominated by narrow-leaved cattail and open water was also observed west of Area A. This pond also met all three wetland parameters. However, review of historic aerial photographs shows that the wet spot within Area A and the stormwater pond were incidentally within former upland when parking lot expansion occurred 2015-2016. Recent aerial photos are provided in **Appendix B**.

*Per Mn WCA Rules 8420.0105 SCOPE. Subp. 2. Applicability.*

*D. This chapter does not regulate impacts to incidental wetlands. "Incidental wetlands" are wetland areas that the landowner can demonstrate, to the satisfaction of the local government unit, were created in nonwetland areas solely by actions, the purpose of which was not to create the wetland. Incidental wetlands include drainage ditches, impoundments, or excavations constructed in nonwetlands solely for the purpose of effluent treatment, containment of waste material, storm water retention or detention, drainage, soil and water conservation practices, and water quality improvements and not as part of a wetland replacement process that may, over time, take on wetland characteristics.*

The aerial photos from 2010 and 2015 show that no wetlands or water features were present in the area of the storm pond or in Area A. By 2016, the parking lot expansion appeared to be complete, standing water and erosion blankets were visible in the storm pond, and wetness was visible within Area A. Wetness within Area A (from parking lot runoff) has remained and wetland vegetation has developed through the most recent photographs (2023).

Based on soil survey information (non-hydric mapped soils) and aerial photo review, it appears that Area A was created in upland through the parking lot expansion and grading activities from 2015-2016, which have caused water to gather and prevented the area from draining as it had prior to the construction. Based on the same information, it appears that the storm pond was excavated in upland for stormwater purposes between 2015 and 2016. **Appendix A** requests formal WCA concurrence with the No-Loss/Incidental determination.

**Requested Approvals**

No wetlands were identified or delineated on the 800 53<sup>rd</sup> Avenue NE property.

**Appendix A** of this memo includes a Joint Application Form for Activities Affecting Water Resources in Minnesota, which is submitted to the City of Columbia Heights to request concurrence with No-Loss/Incidental determination under the Minnesota Wetland Conservation Act (WCA).

**Certificate of Delineation**

The procedures utilized in the described delineation are based on the U.S. Army Corps of Engineers 1987 Wetlands Delineation Manual as required under Section 404 of the Clean Water Act and the Minnesota Wetland Conservation Act. This wetland delineation and report were prepared in compliance with the regulatory standards in place at the time the work was performed. Site boundaries indicated on figures within this report are approximate and do not constitute an official survey product.

Delineation completed by: Faith Holaday, Wetland/Soil Specialist  
Minnesota Certified Wetland Professional In-Training No. 5526

Report prepared by: Faith Holaday, Wetland/Soil Specialist  
Minnesota Certified Wetland Professional In-Training No. 5526

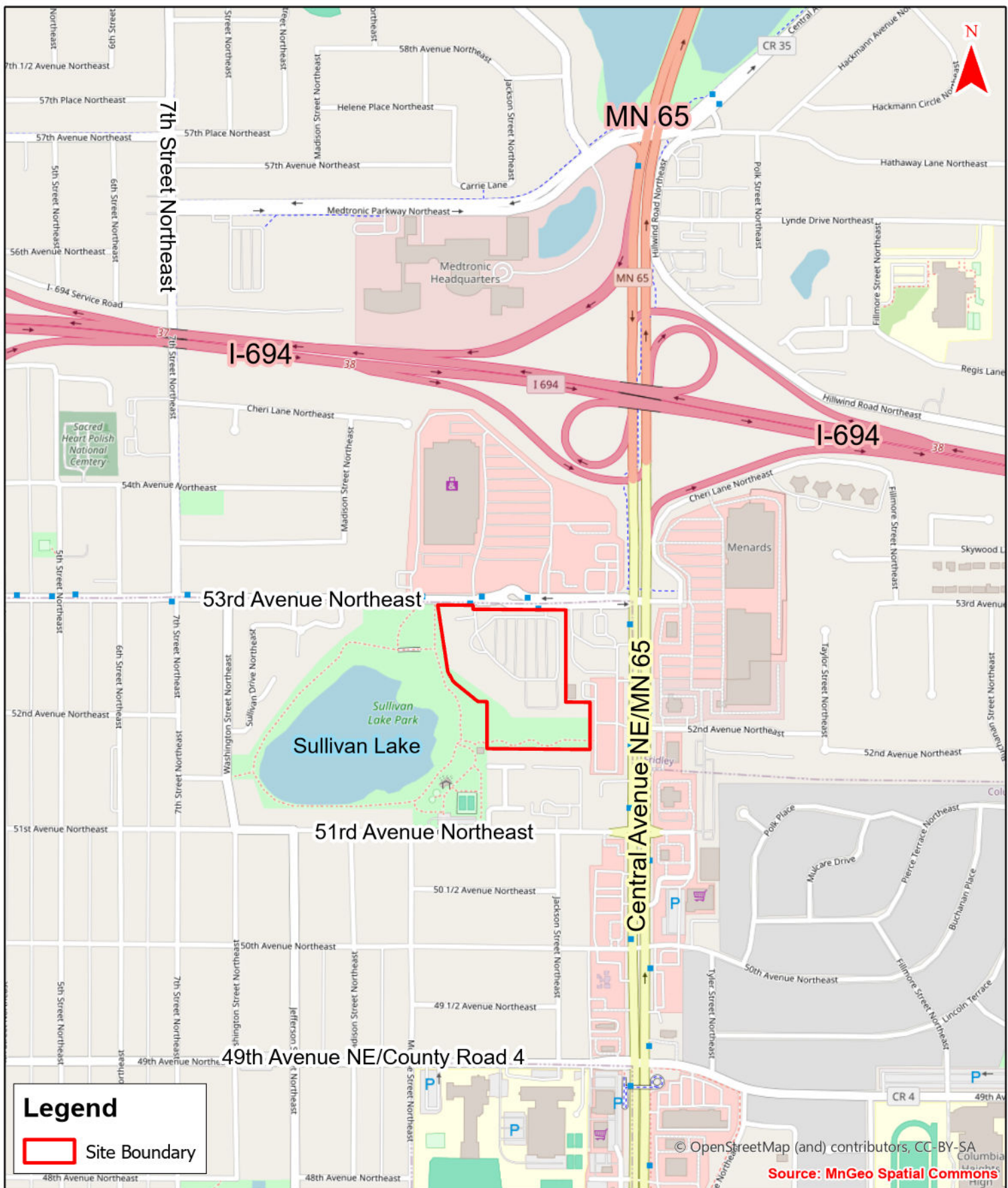
Report reviewed by:  Date: May 16, 2025  
Mark Kjolhaug, Professional Wetland Scientist No. 000845

# **800 53<sup>RD</sup> AVENUE NE**

## **No Wetland Determination**

### **Figures:**

- Figure 1 – Site Location Map
- Figure 2 – Existing Conditions Map
- Figure 3 – NWI Map
- Figure 4 – Soil Survey Map
- Figure 5 – DNR Public Waters Map
- Figure 6 – National Hydrography Dataset Map



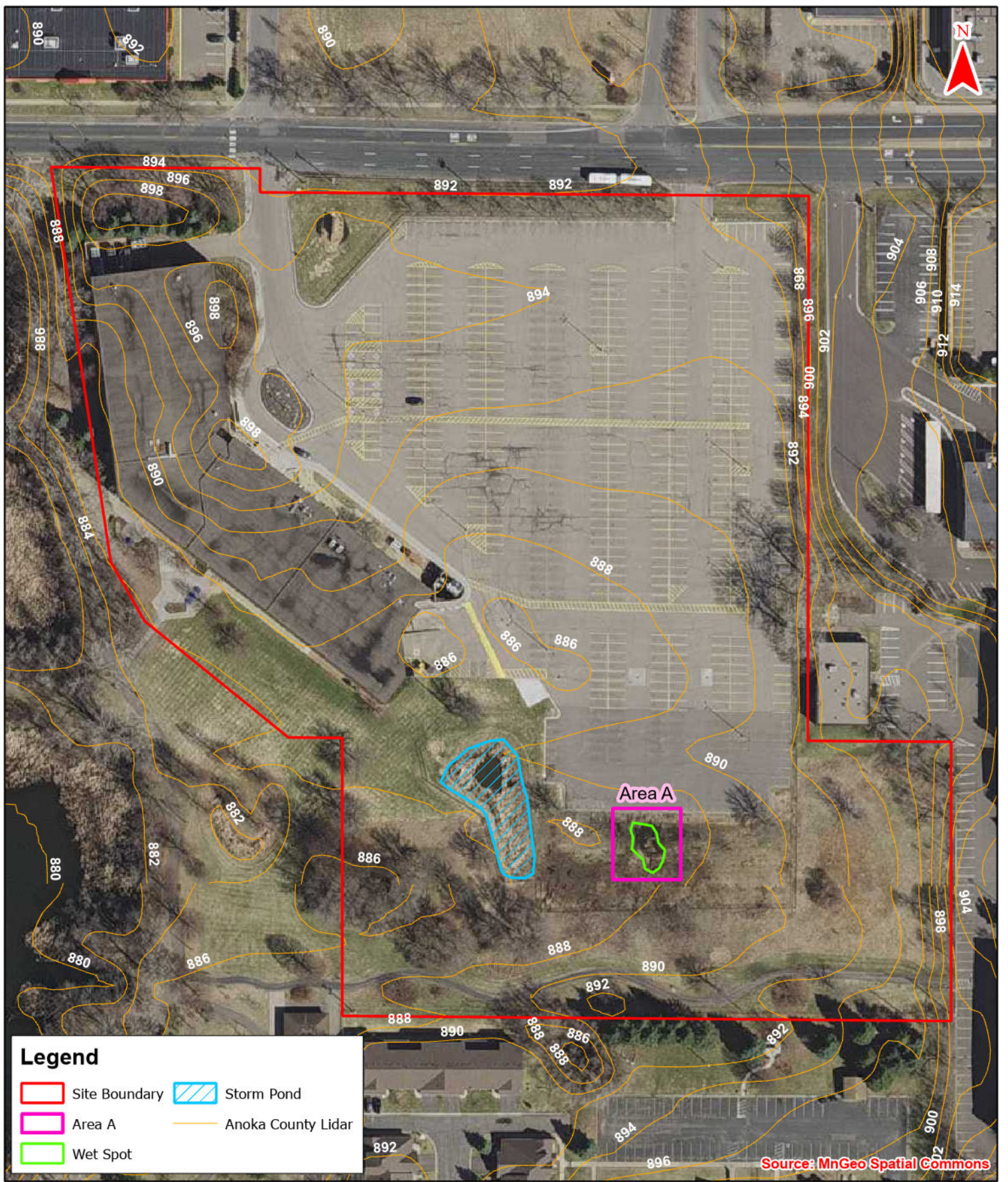
**Figure 1 - Site Location**

**800 53rd Avenue NE (KES 2025-052)  
Columbia Heights, Minnesota**

Note: Boundaries indicated on this figure are approximate and do not constitute an official survey product.



0 2,000 Feet



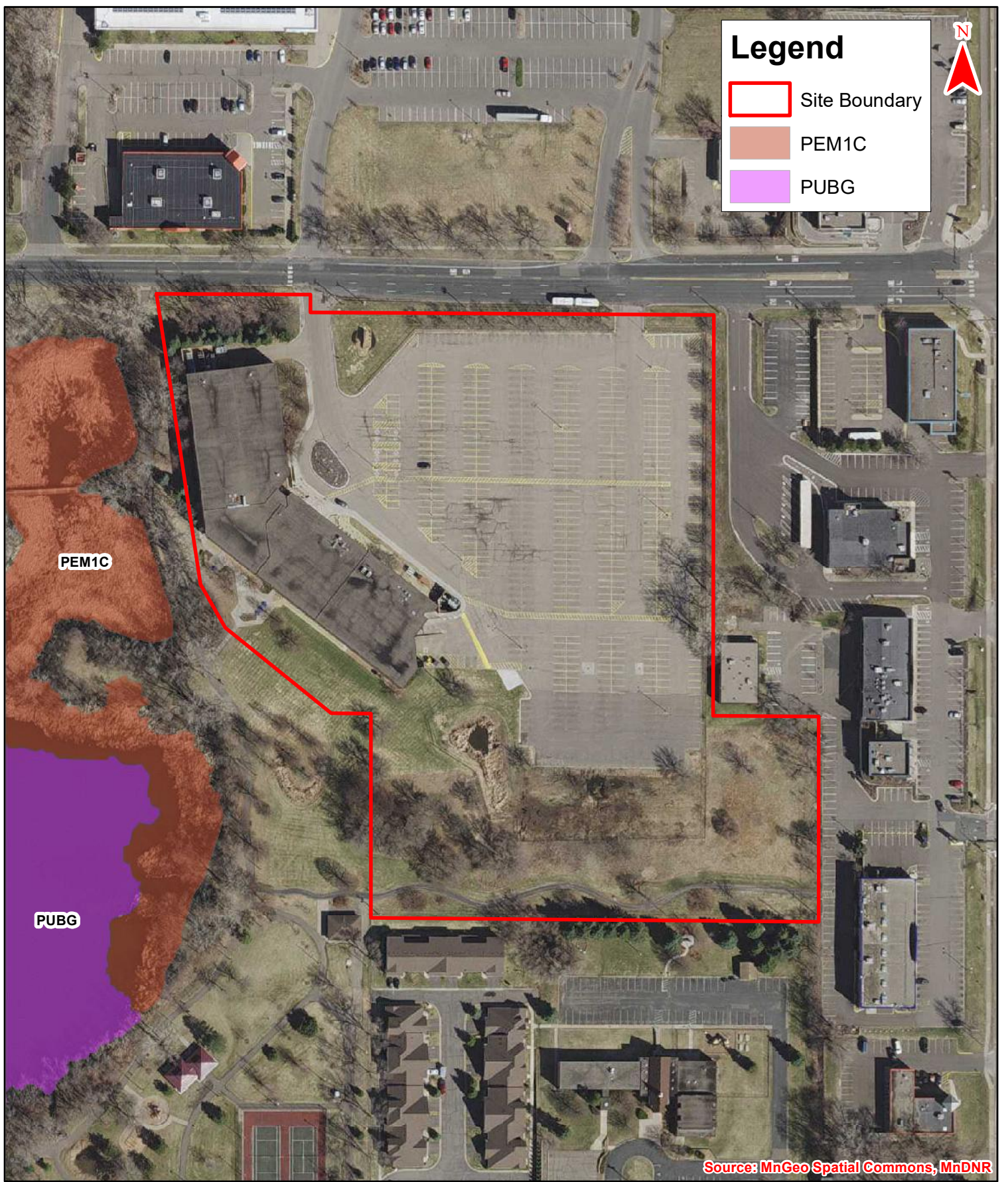
**Figure 2 - Existing Conditions (2020 TC Metro Photo)**

800 53rd Avenue NE (KES 2025-052)  
Columbia Heights, Minnesota

Note: Boundaries indicated on this figure are approximate and do not constitute an official survey product.



0 300 Feet



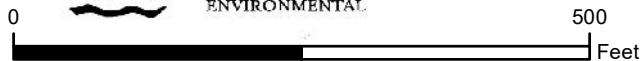
**Figure 3 - MnDNR National Wetlands Inventory Update**

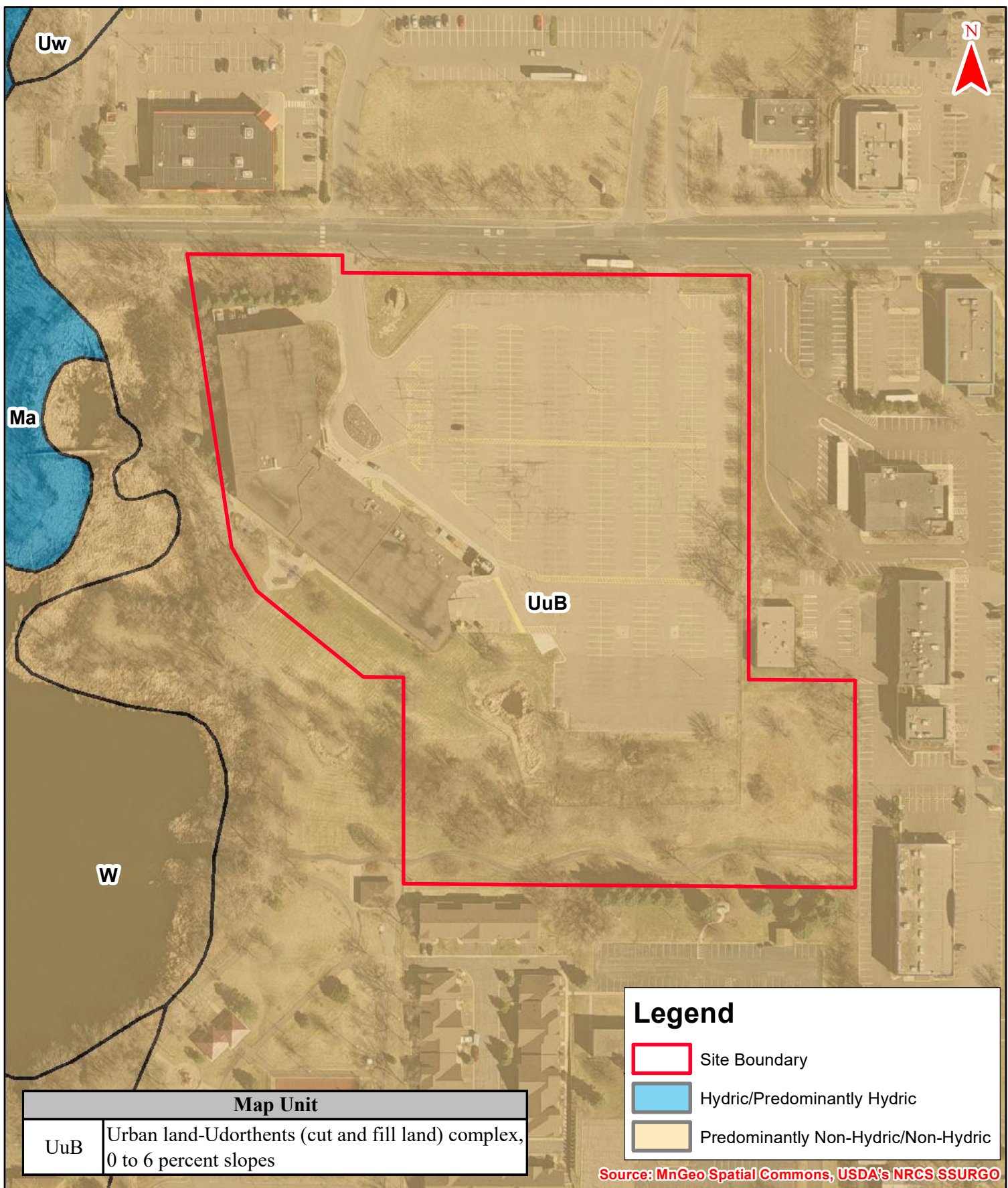
**800 53rd Avenue NE (KES 2025-052)  
Columbia Heights, Minnesota**

Note: Boundaries indicated on this figure are approximate and do not constitute an official survey product.



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**Figure 4 - Soil Survey**

**800 53rd Avenue NE (KES 2025-052)  
Columbia Heights, Minnesota**





Note: Boundaries indicated on this figure are approximate and do not constitute an official survey product.



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**Legend**

-  Site Boundary
-  Public Water Watercourse
-  Public Ditch/Altered Natural Watercourse
-  Public Waters Basins



Source: MnGeo Spatial Commons, MnDNR

**Figure 5 - DNR Public Waters Inventory**

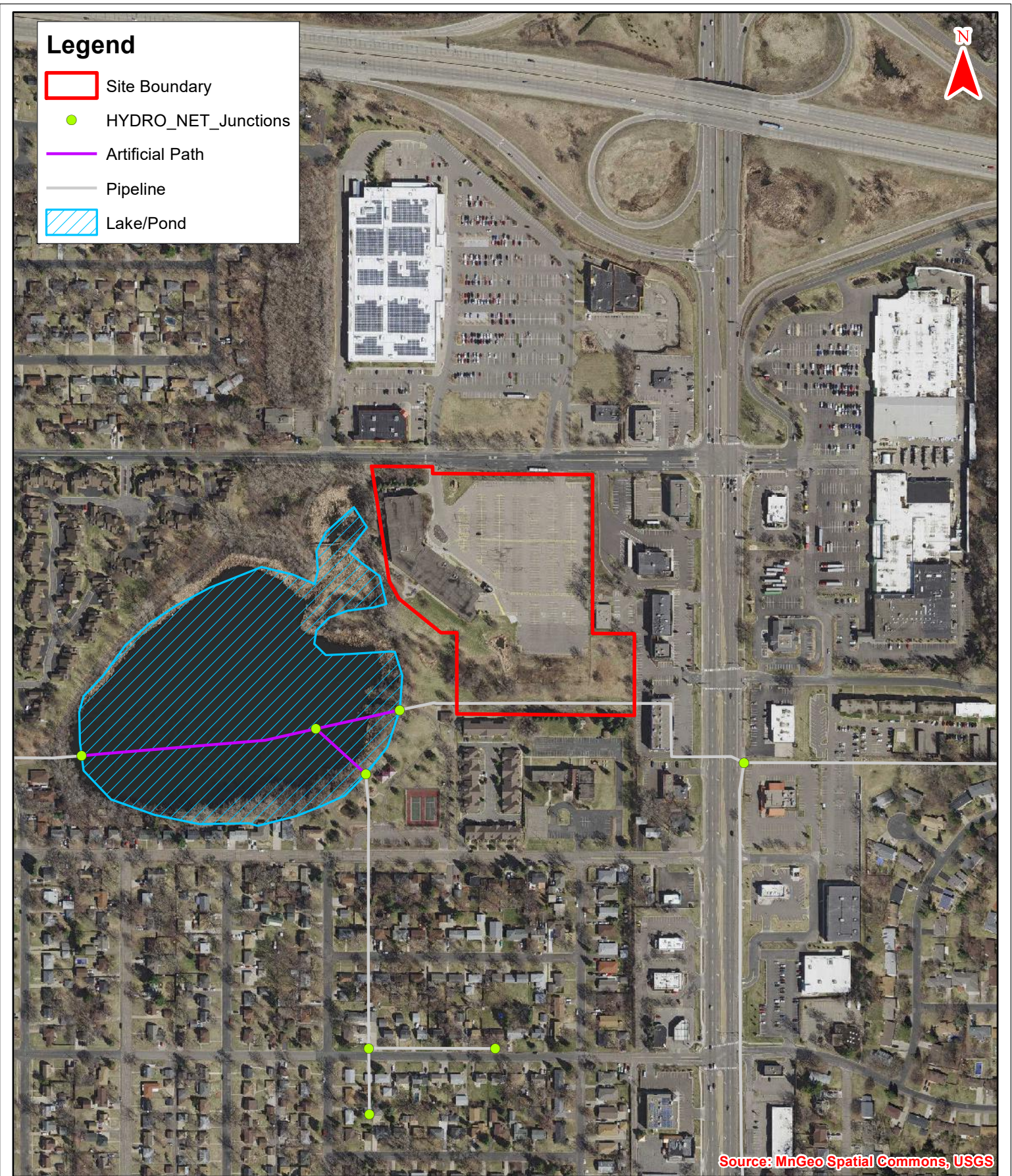
**800 53rd Avenue NE (KES 2025-052)  
Columbia Heights, Minnesota**

Note: Boundaries indicated on this figure are approximate and do not constitute an official survey product.



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**Figure 6 - National Hydrography Dataset**

**800 53rd Avenue NE (KES 2025-052)  
Columbia Heights, Minnesota**

Note: Boundaries indicated on this figure are approximate and do not constitute an official survey product.



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0 1,000 Feet

**800 53<sup>RD</sup> AVENUE NE**  
**No Wetland Determination**

**Appendix A**

**Joint Application Form for Activities  
Affecting Water Resources in Minnesota**

## PART ONE: Applicant Information

If applicant is an entity (company, government entity, partnership, etc.), an authorized contact person must be identified. If the applicant is using an agent (consultant, lawyer, or other third party) and has authorized them to act on their behalf, the agent's contact information must also be provided.

**Applicant/Landowner Name:** Lincoln Avenue Communities; c/o Kyle Brassler

**Mailing Address:**

**Phone:** 612-351-3411

**E-mail Address:** kbrasser@lincolnavenue.com

**Authorized Contact (do not complete if same as above):** Loucks, Inc.; c/o Todd McLouth

**Mailing Address:**

**Phone:** 763.496.6742

**E-mail Address:** TMcLouth@loucksinc.com

**Agent Name:** Kjolhaug Environmental Services; c/o Faith Holaday

**Mailing Address:** 2500 Shadywood Road Orono, MN 55331

**Phone:** (608) 852-2337

**E-mail Address:** faith@kjolhaugenv.com

## PART TWO: Site Location Information

**County:** Anoka

**City/Township:** Columbia Heights

**Parcel ID and/or Address:** 800 53<sup>rd</sup> Avenue NE, Columbia Heights, MN (PID: 26-30-24-11-0020)

**Legal Description (Section, Township, Range):** SEC 26, TWP 30N, RNG 24W

**Lat/Long (decimal degrees):**

**Attach a map showing the location of the site in relation to local streets, roads, highways.**

**Approximate size of site (acres) or if a linear project, length (feet):** 11.7 acres

If you know that your proposal will require an individual Permit from the U.S. Army Corps of Engineers, you must provide the names and addresses of all property owners adjacent to the project site. This information may be provided by attaching a list to your application or by using block 25 of the Application for Department of the Army permit which can be obtained at:

[http://www.mvp.usace.army.mil/Portals/57/docs/regulatory/RegulatoryDocs/engform\\_4345\\_2012oct.pdf](http://www.mvp.usace.army.mil/Portals/57/docs/regulatory/RegulatoryDocs/engform_4345_2012oct.pdf)

## PART THREE: General Project/Site Information

If this application is related to a delineation approval, exemption determination, jurisdictional determination, or other correspondence submitted *prior to* this application then describe that here and provide the Corps of Engineers project number.

Describe the project that is being proposed, the project purpose and need, and schedule for implementation and completion. The project description must fully describe the nature and scope of the proposed activity including a description of all project elements that effect aquatic resources (wetland, lake, tributary, etc.) and must also include plans and cross section or profile drawings showing the location, character, and dimensions of all proposed activities and aquatic resource impacts.

**No-Loss/Incidental concurrence.**

## PART FOUR: Aquatic Resource Impact<sup>1</sup> Summary

If your proposed project involves a direct or indirect impact to an aquatic resource (wetland, lake, tributary, etc.) identify each impact in the table below. Include all anticipated impacts, including those expected to be temporary. Attach an overhead view map, aerial photo, and/or drawing showing all of the aquatic resources in the project area and the location(s) of the proposed impacts. Label each aquatic resource on the map with a reference number or letter and identify the impacts in the following table.

Aquatic Resource ID (as noted on overhead view)	Aquatic Resource Type (wetland, lake, tributary etc.)	Type of Impact (fill, excavate, drain, or remove vegetation)	Duration of Impact Permanent (P) or Temporary (T) <sup>1</sup>	Size of Impact <sup>2</sup>	Overall Size of Aquatic Resource <sup>3</sup>	Existing Plant Community Type(s) in Impact Area <sup>4</sup>	County, Major Watershed #, and Bank Service Area # of Impact Area <sup>5</sup>

<sup>1</sup>If impacts are temporary; enter the duration of the impacts in days next to the "T". For example, a project with a temporary access fill that would be removed after 220 days would be entered "T (220)".

<sup>2</sup>Impacts less than 0.01 acre should be reported in square feet. Impacts 0.01 acre or greater should be reported as acres and rounded to the nearest 0.01 acre. Tributary impacts must be reported in linear feet of impact and an area of impact by indicating first the linear feet of impact along the flowline of the stream followed by the area impact in parentheses). For example, a project that impacts 50 feet of a stream that is 6 feet wide would be reported as 50 ft (300 square feet).

<sup>3</sup>This is generally only applicable if you are applying for a de minimis exemption under MN Rules 8420.0420 Subp. 8, otherwise enter "N/A".

<sup>4</sup>Use *Wetland Plants and Plant Community Types of Minnesota and Wisconsin* 3<sup>rd</sup> Ed. as modified in MN Rules 8420.0405 Subp. 2.

<sup>5</sup>Refer to Major Watershed and Bank Service Area maps in MN Rules 8420.0522 Subp. 7.

If any of the above identified impacts have already occurred, identify which impacts they are and the circumstances associated with each:

## PART FIVE: Applicant Signature

Check here if you are requesting a pre-application consultation with the Corps and LGU based on the information you have provided. Regulatory entities will not initiate a formal application review if this box is checked.

By signature below, I attest that the information in this application is complete and accurate. I further attest that I possess the authority to undertake the work described herein.

Signature:  Date: 05/16/2025

I hereby authorize Kjolhaug Environmental Services to act on my behalf as my agent in the processing of this application and to furnish, upon request, supplemental information in support of this application.

<sup>1</sup> The term "impact" as used in this joint application form is a generic term used for disclosure purposes to identify activities that may require approval from one or more regulatory agencies. For purposes of this form it is not meant to indicate whether or not those activities may require mitigation/replacement.

## Attachment A

# Request for Delineation Review, Wetland Type Determination, or Jurisdictional Determination

By submission of the enclosed wetland delineation report, I am requesting that the U.S. Army Corps of Engineers, St. Paul District (Corps) and/or the Wetland Conservation Act Local Government Unit (LGU) provide me with the following (check all that apply):

**Wetland Type Confirmation**

**Delineation Concurrence.** Concurrence with a delineation is a written notification from the Corps and a decision from the LGU concurring, not concurring, or commenting on the boundaries of the aquatic resources delineated on the property. Delineation concurrences are generally valid for five years unless site conditions change. Under this request alone, the Corps will not address the jurisdictional status of the aquatic resources on the property, only the boundaries of the resources within the review area (including wetlands, tributaries, lakes, etc.).

**Preliminary Jurisdictional Determination.** A preliminary jurisdictional determination (PJD) is a non-binding written indication from the Corps that waters, including wetlands, identified on a parcel may be waters of the United States. For purposes of computation of impacts and compensatory mitigation requirements, a permit decision made on the basis of a PJD will treat all waters and wetlands in the review area as if they are jurisdictional waters of the U.S. PJDs are advisory in nature and may not be appealed.

**Approved Jurisdictional Determination.** An approved jurisdictional determination (AJD) is an official Corps determination that jurisdictional waters of the United States are either present or absent on the property. AJDs can generally be relied upon by the affected party for five years. An AJD may be appealed through the Corps administrative appeal process.

In order for the Corps and LGU to process your request, the wetland delineation must be prepared in accordance with the 1987 Corps of Engineers Wetland Delineation Manual, any approved Regional Supplements to the 1987 Manual, and the *Guidelines for Submitting Wetland Delineations in Minnesota* (2013).

<http://www.mvp.usace.army.mil/Missions/Regulatory/DelineationJDGuidance.aspx>

## **Attachment B**

# **Supporting Information for Applications Involving Exemptions, No Loss Determinations, and Activities Not Requiring Mitigation**

Complete this part *if* you maintain that the identified aquatic resource impacts in Part Four do not require wetland replacement/compensatory mitigation OR *if* you are seeking verification that the proposed water resource impacts are either exempt from replacement or are not under CWA/WCA jurisdiction.

Identify the specific exemption or no-loss provision for which you believe your project or site qualifies:

*Per Mn WCA Rules 8420.0105 SCOPE. Subp. 2. Applicability.*

*D. This chapter does not regulate impacts to incidental wetlands. "Incidental wetlands" are wetland areas that the landowner can demonstrate, to the satisfaction of the local government unit, were created in nonwetland areas solely by actions, the purpose of which was not to create the wetland. Incidental wetlands include drainage ditches, impoundments, or excavations constructed in nonwetlands solely for the purpose of effluent treatment, containment of waste material, storm water retention or detention, drainage, soil and water conservation practices, and water quality improvements and not as part of a wetland replacement process that may, over time, take on wetland characteristics.*

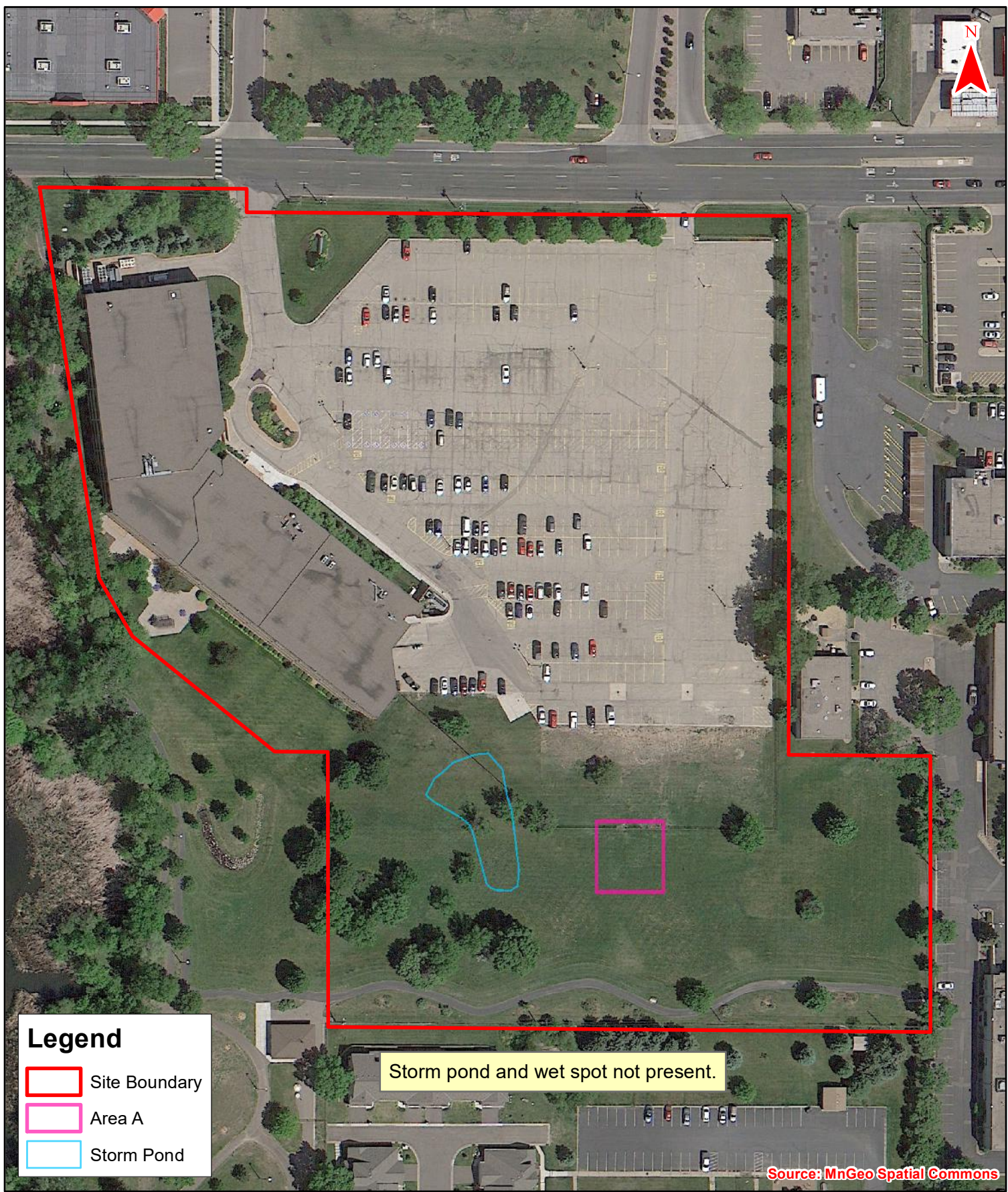
Provide a detailed explanation of how your project or site qualifies for the above. Be specific and provide and refer to attachments and exhibits that support your contention. Applicants should refer to rules (e.g. WCA rules), guidance documents (e.g. BWSR guidance, Corps guidance letters/public notices), and permit conditions (e.g. Corps General Permit conditions) to determine the necessary information to support the application. Applicants are strongly encouraged to contact the WCA LGU and Corps Project Manager prior to submitting an application if they are unsure of what type of information to provide:

**See memo for explanation.**

**800 53<sup>RD</sup> AVENUE NE**  
**No Wetland Determination**

**Appendix B**

**Historic Aerial Photographs**



**Legend**

- Site Boundary
- Area A
- Storm Pond

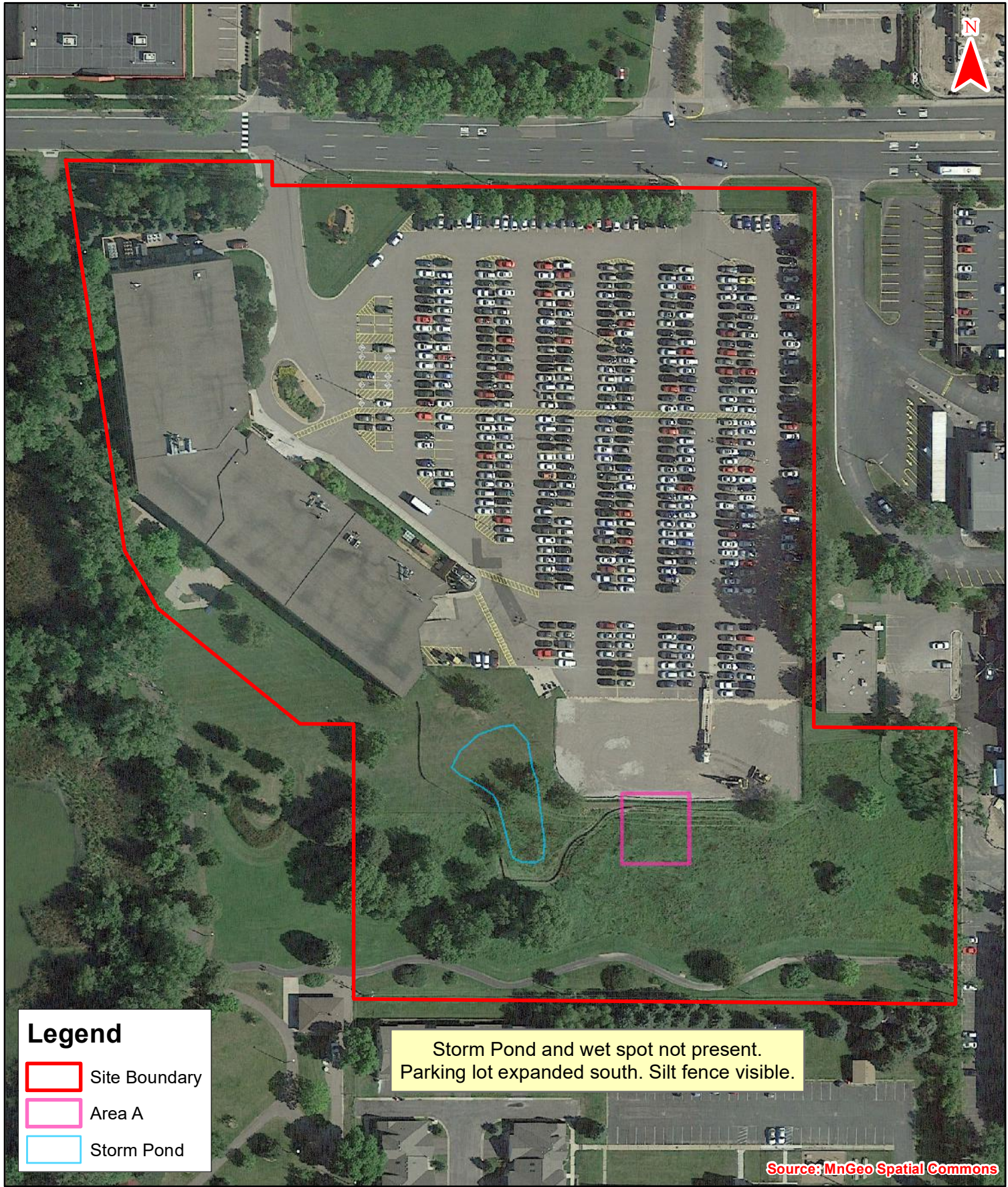
Storm pond and wet spot not present.

Source: MnGeo Spatial Commons



**May 18, 2010 Google Earth**  
**800 53rd Avenue NE (KES 2025-052)**  
**Columbia Heights, Minnesota**

Note: Boundaries indicated on this figure are approximate and do not constitute an official survey product.



**Legend**

- Site Boundary
- Area A
- Storm Pond

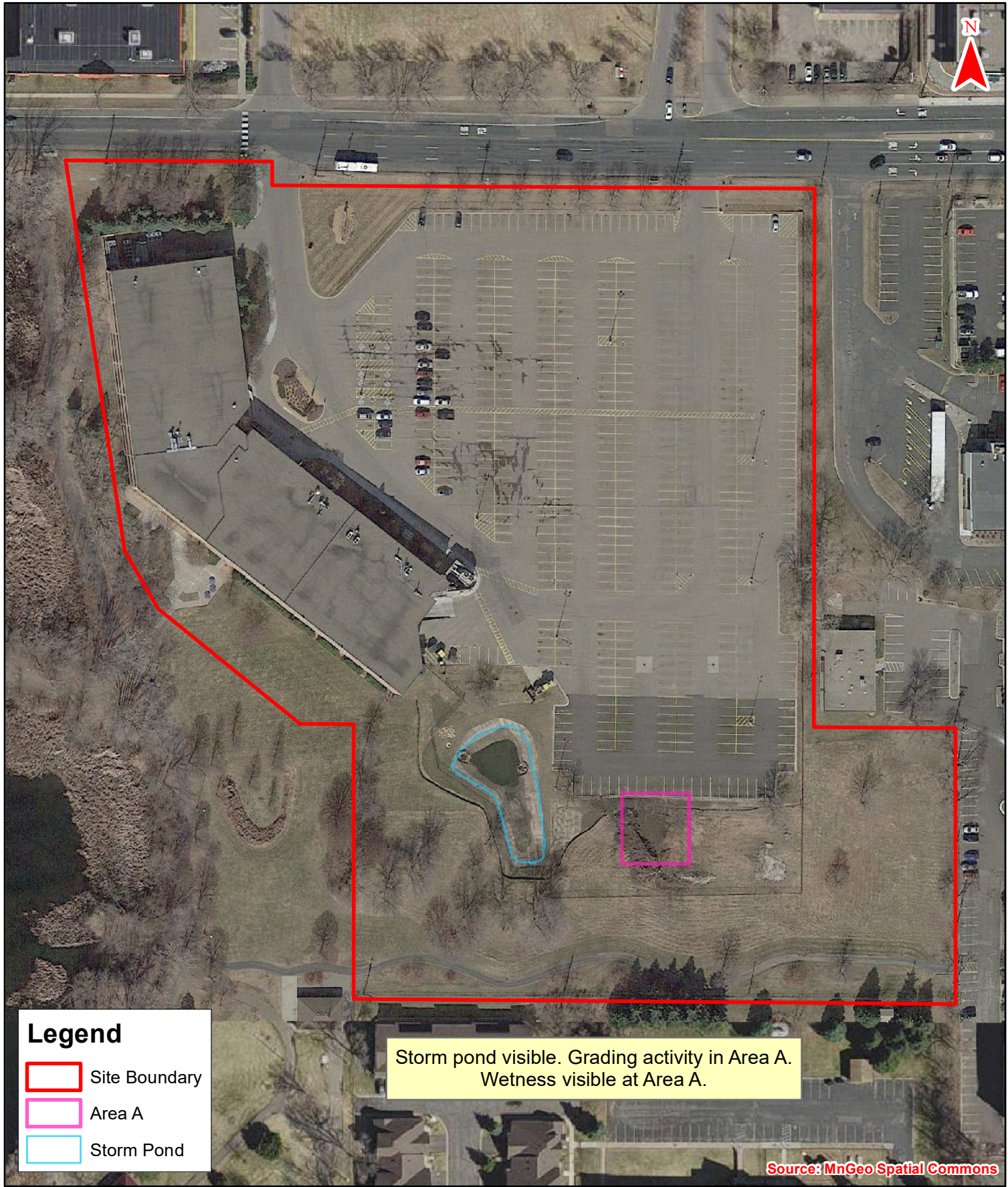
Storm Pond and wet spot not present.  
 Parking lot expanded south. Silt fence visible.

Source: MnGeo Spatial Commons



**August 11, 2015 Google Earth**  
 800 53rd Avenue NE (KES 2025-052)  
 Columbia Heights, Minnesota

Note: Boundaries indicated on this figure are approximate and do not constitute an official survey product.



**Legend**

- Site Boundary
- Area A
- Storm Pond

Storm pond visible. Grading activity in Area A.  
Wetness visible at Area A.

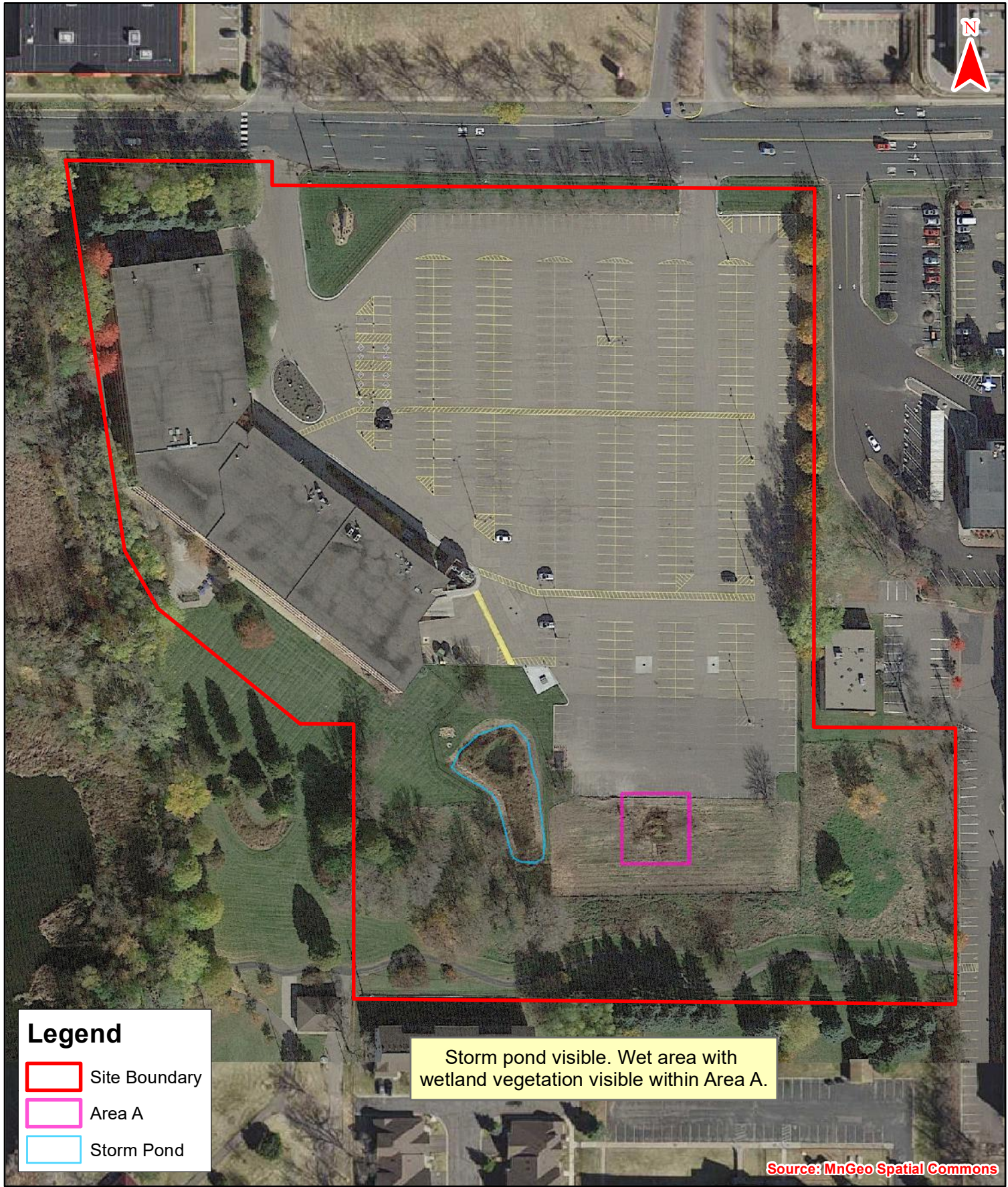
Source: MnGeo Spatial Commons

**March 11, 2016 Google Earth**

**800 53rd Avenue NE (KES 2025-052)  
Columbia Heights, Minnesota**



Note: Boundaries indicated on this figure are approximate and do not constitute an official survey product.



**Legend**

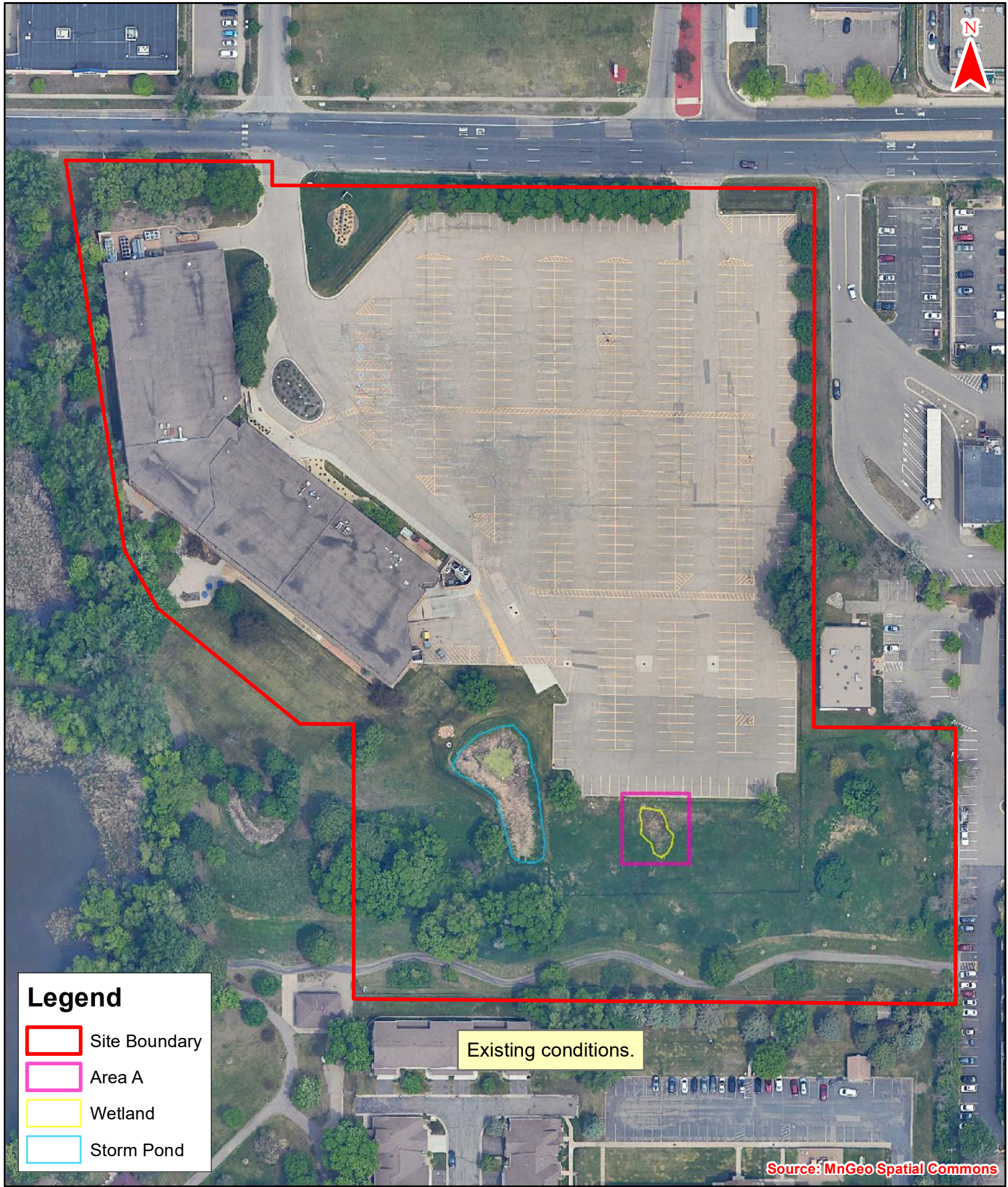
-  Site Boundary
-  Area A
-  Storm Pond



**October 25, 2019 Google Earth**

**800 53rd Avenue NE (KES 2025-052)  
Columbia Heights, Minnesota**

Note: Boundaries indicated on this figure are approximate and do not constitute an official survey product.



**Legend**

-  Site Boundary
-  Area A
-  Wetland
-  Storm Pond

Existing conditions.

Source: MnGeo Spatial Commons



**May 20, 2023 Google Earth**

**800 53rd Avenue NE (KES 2025-052)  
Columbia Heights, Minnesota**

Note: Boundaries indicated on this figure are approximate and do not constitute an official survey product.

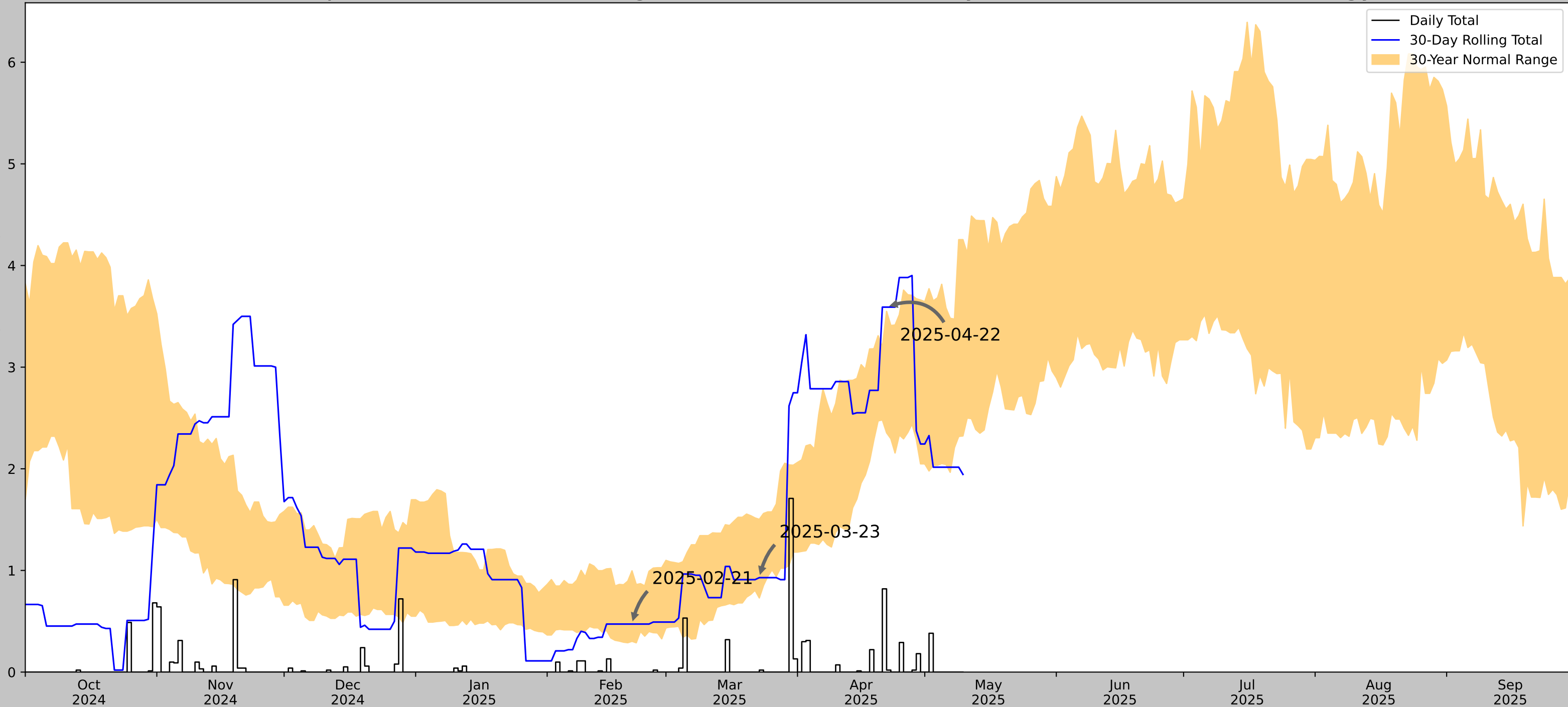
**800 53<sup>RD</sup> AVENUE NE**  
**No Wetland Determination**

**Appendix C**

**Precipitation Data**


# Antecedent Precipitation vs Normal Range based on NOAA's Daily Global Historical Climatology Network

Rainfall (Inches)




Coordinates	45.06347, -93.25104
Observation Date	2025-04-22
Elevation (ft)	893.753
Drought Index (PDSI)	Mild drought
WebWIMP H <sub>2</sub> O Balance	Wet Season

30 Days Ending	30 <sup>th</sup> %ile (in)	70 <sup>th</sup> %ile (in)	Observed (in)	Wetness Condition	Condition Value	Month Weight	Product
2025-04-22	2.353937	3.548819	3.590551	Wet	3	3	9
2025-03-23	0.729134	1.502756	0.929134	Normal	2	2	4
2025-02-21	0.302756	0.996457	0.472441	Normal	2	1	2
Result							Wetter than Normal - 15



Figures and tables made by the  
Antecedent Precipitation Tool  
Version 2.0

Developed by:  
U.S. Army Corps of Engineers and  
U.S. Army Engineer Research and  
Development Center



Weather Station Name	Coordinates	Elevation (ft)	Distance (mi)	Elevation Δ	Weighted Δ	Days Normal	Days Antecedent
U OF MN ST PAUL	44.9903, -93.18	970.144	6.131	76.391	3.227	11308	90
FALCON HEIGHTS 0.4 NNW	44.9956, -93.1793	979.003	0.368	8.859	0.169	2	0
ST PAUL 3SW	44.9311, -93.1539	924.869	4.285	45.275	2.122	31	0
LOWER ST ANTHONY FALLS	44.9786, -93.2469	753.937	3.368	216.207	2.244	12	0