Meeting: Board Meeting  
Meeting date: 8/26/2021  
Agenda Item #: 10.1  
Item type: Permit Consideration

Title: Permit 21-161: Interlachen Country Club, 6200 Interlachen Blvd, Edina

Prepared by: Name: Abigail Ernst  
Phone: 952-641-4504  
aernst@minnehahacreek.org

Recommendation:

Approval of MCWD permit application on the following stipulations:

1. Submission of maintenance declaration for Stormwater Management, Waterbody Crossings and Structures, and Wetland Buffers for District approval, then recordation and submission of receipt
2. Submission of NPDES permit number and responsible contractor
   a. Erosion Control Financial Assurance- $2,500.00  
   b. Stormwater Management Financial Assurance- $2,600.00
4. Reimbursement of Engineering and mailing fees  
   a. Engineering Fee- $6,454.00  
   b. Mailing Fee- $108.00

Condition for permit closeout:
5. Submission of an as-built survey upon completion of the project

Summary:

The Interlachen Country Club (Applicant) has applied for a Minnehaha Creek Watershed District (MCWD) permit for the construction of a parking lot and small accessory building on their property. The project triggers Erosion Control, Stormwater Management, Waterbody Crossings and Structures, and Wetland Protection rules. The project meets the requirements for all applicable rules.

Background:

Location:

To provide context, the Interlachen Country Club is a 76.36-acre commercial property, consisting of several parking areas, tennis courts, accessory buildings, and an 18-hole golf course. The property sits in the Northwest corner of the City of Edina. The entirety of the proposed project area is within MCWD legal boundary, but the property does not fully lay within the hydrologic boundary; the southern portion of the property is within the Nine Mile Creek Watershed District. Drainage is generally split across the property, with the Northern half routing toward Wetland #1 (see site map) and continuing through stormwater pipes to the City of Hopkins; the other half routing South to Mirror Lake, either directly or through Wetland #2.
Project Areas and Proposed Improvements:

The Applicant is proposing to construction in three separate areas of the same property. The first area (Area 1) is in the Southwest portion of and is approximately 3.40 acres. The proposed improvements include a new bituminous parking lot, concrete curb and gutter, expanded parking along Waterman Ave, fire turn around cul-de-sac, concrete sidewalk, and filtration basin.

The second area (Area 2) is located along Interlachen Boulevard and is approximately 0.44 acres. The proposed improvements include a small accessory building, reconstructed bituminous road, and reconstructed curb and gutter.

The third area (Area 3) is the parking lot in the Northwest portion of the property, approximately 0.87 acres. The proposed improvements include reclamation of the existing parking area, installation of proposed storm sewer, and the upgrade of an existing lift station.

Stormwater Treatment:

Through geotechnical analysis, it was determined that infiltration was not feasible on site and that a filtration basin would have to be used for stormwater treatment. The proposed basin exceeds permitting standards by providing additional treatment. Full stormwater management is described in the Stormwater Management section.

District Rule Analysis:

Erosion Control Rule

The District’s Erosion Control rule is applied to projects proposing 5,000 square feet of disturbance or 50 cubic yards of excavation, fill, or stockpiling on-site. The Applicant is proposing 5.04 acres of disturbance; therefore, the rule is triggered.

Per section 5(a) and 5(b) of the rule, an erosion and control plan has been submitted and displays erosion and sediment control best management practices. These include rock construction entrance, silt fence down gradient of disturbed areas, and inlet protections where necessary.

Per section 6 of the rule, a geotechnical report and soil boring results have been provided. It was determined that the soils are not conductive to infiltration, so filtration is proposed for stormwater management.

Section 7 of the rule does not apply, no additional information was requested.

Per section 8 of the rule, submission of a financial assurance is listed as a recommended condition of approval to satisfy this requirement.

In summary, upon satisfaction of the recommended conditions, the project meets the requirements of the Erosion Control Rule.

Wetland Protection Rule

The Buffer provision of the Wetland Protection rule is required if the work needs a permit under the Stormwater Management or Waterbody Crossings & Structures rule. Both the Stormwater Management and Waterbody Crossings and Structures rules are triggered; therefore, the buffer requirement is triggered. A previous project,
permit 18-313, required a buffer along the southern edge of Wetland #1, therefore, a buffer will only be added along the Eastern edge, which is adjacent to the disturbance of Area 2.

Per section 5(a) of the Wetland Protection rule, buffers must be provided on wetland edges downgradient of disturbance. The applicant has provided plans that include a wetland buffer provided on the eastern edge of the downgradient Wetland #1

Per section 5(b) of the rule, buffers are required, and have been analyzed under section 6, below.

Per section 5(c) of the rule, buffers must be documented by a declaration or other recordable instrument. Submission of a maintenance declaration is listed as a recommended condition of approval to satisfy this requirement.

Section 5(d) of the rule requires a permanent wetland buffer monument to be installed at each lot line where it intersects the buffer, and where needed to indicate the contour of the buffer, with a maximum spacing of 100 feet. A buffer monumentation plan has been submitted and will be included in the buffer maintenance declaration, which is listed as a recommended condition of approval.

Per section 6(a) of the rule, buffer width requirements are determined by the management class of the wetland. A delineation and MNRAM performed in June of 2018, classified this wetland as a Manage 2, which corresponds to a 30-foot buffer.

Per section 6(c) of the rule, buffer averaging is permitted should the full width of the buffer not be able to be provided in all locations. Under this provision of the rule, buffer averaging may encompass minimum buffer widths of 15 feet (50%), with a maximum width of 60 feet (200%) for Manage 2 wetlands, provided that there is no reduction in total buffer area (assumes an area equal to a uniform 30-foot buffer along the length of the wetland). Based on review of the plans and specifications, the Applicant will be averaging the buffer in two areas. Area 1 is being decreased by 491 sqft and Area 2 is being decreased by 1,112 sqft. Both Areas 1 and 2 deficiencies will be distributed along the remaining buffer areas to mitigate deficiencies.

Section 6(d) of the rule does not apply, as the Applicant has not requested a reduction in Applied Buffer Width.

Section 6(e) of the rule does not apply, because the project is not resurfacing, but reconstruction, and further while the project involves the reconstruction of a road, the road is privately owned and therefore has no public right-of-way.

Section 6(f) of this rule does not apply as this project is not a New Principal Residential Structure.

The criteria of section 7(a) of the Wetland Protection rule, which prohibits actions such as mowing, fertilizing or placement of yard waste within the buffer area, is memorialized with the maintenance declaration. Submission of a maintenance declaration including these provisions is listed as a recommended condition of approval.

Section 7(b) of the rule does not apply as the site is not considered public land, a homeowner’s association property, or public right-of-way.

Per section 7(c) of the rule, a vegetated buffer plan will be required due to the disturbance caused by the storm sewer removal.

In summary, upon satisfaction of the recommended conditions, the project meets the requirements of the Wetland Protection Rule.
**Waterbody Crossings and Structures Rule**

The District Waterbody Crossings & Structures rule is applicable for any project that proposes to place a road, highway, utility, bridge, boardwalk, or associated structure in contact with the bed or bank of any waterbody. The project proposes the removal of a stormwater pipe and installation of new pipe and lift station, that outlets into the bank of a detention pond.

Section 3(a) of the rule does not apply as it does not involve a crossing and the detention pond is a not a public water.

Per section 3(b), the placement of the new pipe and lift station shall retain adequate hydraulic capacity, and any changes in hydraulic capacity may not result in upstream or downstream increases in flood stage. The proposed stormwater pipe and lift station will reduce rates and thus reduce stormwater flows during the 1-year, 10-year, and 100-year storm events. After review of the proposed plans, the District Engineer has confirmed that the applicant has demonstrated that hydraulic capacity will be retained.

Section 3(c) of the rule does not apply as the waterbody does not have adequate navigation capacity.

Per section 3(d), aquatic and upland wildlife passages shall be preserved. The proposed lift station is for stormwater conveyance from the detention pond and will not impede wildlife passage. Aquatic and upland wildlife passages will be preserved from existing to proposed conditions.

Per Section 3(e), the placement of a structure shall not adversely affect water quality. As proposed, no negative effects on water quality are associated with the pipe and lift station replacement.

Per Section 3(f), the applicant has submitted design alternatives to show the proposed plan meets the minimal impact solution with respect to all other reasonable alternatives. One alternative submitted was a no-build scenario. This option is not feasible because the current pipe system is degraded and would not meet project goals. The second alternative submitted was to use a portable sump pump, which is not a feasible solution because it would cause a safety hazard. Based on the two alternatives submitted for the project, MCWD staff concur that the applicant has demonstrated that the proposed plan represents a minimal impact solution.

Sections 3(g) and 3(h) do not apply to this project, as no work is proposed below the bed of the stormwater pond.

Per section 6, the maintenance requirement of waterbody crossings and structures will be satisfied through the recordation of a maintenance declaration, listed as a recommended condition of approval.

The project, as designed, meets the District’s Waterbody Crossings and Structures rule.

**Stormwater Management Rule**

The District’s Stormwater Management Rule is applied to projects that propose the creation of new or replacement of existing impervious surface. The proposed project proposes an increase of 0.76 acres from existing conditions. The project proposes redevelopement of a site greater than one acre; less than 40% of the site will be disturbed; less than 50% increase in impervious surface; and therefore, phosphorus, rate, and volume control will be required for the site’s new impervious surface. The Applicant has proposed to meet the District’s Stormwater Management rule by constructing a filtration basin to treat runoff from the new impervious surface.
Table 1: Existing and Proposed Site Conditions

<table>
<thead>
<tr>
<th>Area</th>
<th>Area Size (ac)</th>
<th>Existing Drainage</th>
<th>Proposed Drainage</th>
<th>Existing Impervious (ac)</th>
<th>Proposed Impervious (ac)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>3.4</td>
<td>Mirror Lake</td>
<td>Mirror Lake/Wetland #1</td>
<td>0.89 (38,768sf)</td>
<td>1.57 (68,389sf)</td>
</tr>
<tr>
<td>2</td>
<td>0.44</td>
<td>Wetland #1</td>
<td>Wetland #1</td>
<td>0.17 (7,405sf)</td>
<td>0.25 (10,890sf)</td>
</tr>
<tr>
<td>3</td>
<td>0.87</td>
<td>Mirror Lake</td>
<td>Mirror Lake</td>
<td>0.38 (16,552sf)</td>
<td>0.38 (16,552sf)</td>
</tr>
</tbody>
</table>

Per section 3(a) of the rule, the phosphorus control requirement is satisfied by meeting the abstraction requirement as outlined in section 3(c). Because the Applicant has demonstrated conformance with the volume control requirement, the phosphorus control requirement has been met. Furthermore, the implementation of the filtration basin will decrease both TSS and TP.

Table 2: Comparison of Total Phosphorus and Total Suspended Solids (lbs./year)

<table>
<thead>
<tr>
<th>Condition</th>
<th>TSS</th>
<th>TP</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing</td>
<td>1,878.0</td>
<td>6.00</td>
</tr>
<tr>
<td>Proposed</td>
<td>787.7</td>
<td>2.7</td>
</tr>
<tr>
<td>% Reduction</td>
<td>58%</td>
<td>55%</td>
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</tbody>
</table>

Per section 3 (b) of the rule, there shall be no net increase in peak runoff rates for 1-, 10-, and 100-year storm events. The District Engineer has reviewed the proposed plans, stormwater models, and stormwater calculations and determined that the project will not increase peak rates during 1-, 10-, and 100-year storm events. The project as proposed is in conformance with the rate requirements of the rule.

Table 3: Existing and Proposed Rate Summary to Wetland #1

<table>
<thead>
<tr>
<th>Condition</th>
<th>Pre-Development Discharge Rate CFS</th>
<th>Post-Development Discharge Rate CFS</th>
</tr>
</thead>
<tbody>
<tr>
<td>1-year</td>
<td>2.62</td>
<td>1.17</td>
</tr>
<tr>
<td>10-year</td>
<td>6.49</td>
<td>2.74</td>
</tr>
<tr>
<td>100-year</td>
<td>13.65</td>
<td>7.99</td>
</tr>
<tr>
<td>Table 4: Existing and Proposed Rate Summary to Mirror Lake</td>
<td></td>
<td></td>
</tr>
<tr>
<td>----------------------------------------------------------</td>
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<tr>
<td>Pre-Development Discharge Rate CFS</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Post-Development Discharge Rate CFS</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1-year</td>
<td>4.64</td>
<td>1.22</td>
</tr>
<tr>
<td>10-year</td>
<td>9.63</td>
<td>6.54</td>
</tr>
<tr>
<td>100-year</td>
<td>18.45</td>
<td>9.67</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Table 5: Existing and Proposed Rate Summary to Wetland #2</th>
</tr>
</thead>
<tbody>
<tr>
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<tr>
<td></td>
</tr>
<tr>
<td>Pre-Development Discharge Rate CFS</td>
</tr>
<tr>
<td>Post-Development Discharge Rate CFS</td>
</tr>
<tr>
<td>1-year</td>
</tr>
<tr>
<td>10-year</td>
</tr>
<tr>
<td>100-year</td>
</tr>
</tbody>
</table>

*The runoff rate increase to the existing Wetland #2 discharges to Mirror Lake and cumulative discharge to Mirror Lake decreases for each storm event*

Per Section 3(c), the Applicant has proposed to provide for the first 1” of abstraction through construction of a filtration basin to treat runoff from the new impervious surface of 33,106 square feet. The Volume Abstraction Credit Schedule states that filtration will receive 50% volume abstraction credit. Therefore, the basin will need to treat for twice the amount.

Net increase in impervious area x 1.0”/12 = Required treatment volume

\[33,106 \text{ sf} \times \frac{1.0”}{12} = 2,759 \text{cf}\]

Filtration volume required = Required treatment volume \times 2

\[2,759 \times 2 = 5,518 \text{ cf}\]

The total treatment volume provided by the basin is 7,408 cf.

Per section 3(d) of the rule, best management practices must be incorporated to limit the creation of impervious surface, maintain or enhance on-site infiltration, peak flow, and limit pollution generation on and discharge from the site. The Applicant has provided plans, stormwater modeling, stormwater calculations, and a narrative to demonstrate conformance with this requirement. Based on review of the Applicant’s submittals, staff and the District Engineer have determined that the proposed filtration basin, designed in conformance with the criteria as outlined in the Minnesota Stormwater Manual, and their incorporation satisfies the requirements of this provision.

Per section 3(e), this section of the rule does not apply as there are no structures within 100-year high water elevation of the filtration basin.

Section 7 of the rule does not apply as the Applicant does not propose using a regional stormwater facility for treatment.

Per section 8(a) of the rule, the impacts to downstream waterbodies section of the rule regulates new point
source discharges and impacts to the bounce, inundation, and runout control elevations of waterbodies. The project does not propose a new point source or a change in the runout control elevation of any waterbody.

Per section 8(b) of the rule, no activity subject of this rule may alter a site in a manner that results in an increase in the bounce in water level for any downstream lake or wetland. No bounce or inundation of Mirror Lake and surrounding wetlands are above the allowable 0.0044 feet (bounce as described by the Minnesota Department of Natural Resources). The project as proposed is in conformance with the downstream waterbody requirements of the rule.

<table>
<thead>
<tr>
<th>Table 6: Existing and Proposed Water Levels</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Waterbody</strong></td>
</tr>
<tr>
<td>Mirror lake</td>
</tr>
<tr>
<td>Wetland #1</td>
</tr>
</tbody>
</table>

Per section 9 of the rule, the maintenance requirement of stormwater facilities will be satisfied through the recordation of a maintenance declaration, listed as a recommended condition of approval.

The project as proposed, upon fulfillment of the recommended condition, meets the requirements of the Stormwater Management Rule.

**Conclusion:**

The Interlachen Country Club has applied for a MCWD permit for the Erosion Control, Wetland Protection, Waterbody Crossings & Structures, and Stormwater Management rules. Staff have found that the project exceeds the required stormwater treatment and that the proposed project meets the applicable rule requirements and recommends approval subject to the conditions of approval.

**Supporting documents:**

1. Water Resources Application Form
2. Site Map
3. Civil Plans
4. Public Comment from Debra Frimerman (request to be included in packet)
WATER RESOURCE PERMIT APPLICATION FORM

Use this form to notify/apply to the Minnehaha Creek Watershed District (MCWD) of a proposed project or work which may fall within their jurisdiction. Fill out this form completely and submit with your site plan, maps, etc. to the MCWD at: 15320 Minnetonka Blvd. Minnetonka, MN 55345.

Keep a copy for your records.

YOU MUST OBTAIN ALL REQUIRED AUTHORIZATIONS BEFORE BEGINNING WORK.

1. Name of each property owner:  Interlachen Country Club - Joel Livingood  
Mailing Address: 6200 Interlachen Blvd   
City: Minneapolis   
State: MN   
Zip: 55436  
Email Address: JLivingood@interlachenc.org   
Phone: 952-924-7401   
Fax:  

2. Property Owner Representative Information (not required) (licensed contractor, architect, engineer, etc.)
Business Name: BKBM Engineers  
Representative Name: Kevin Bohl  
Business Address: 6120 Earle Brown Drive   
City: Minneapolis   
State: MN   
Zip: 55430  
Email Address: KBohl@bkbm.com   
Phone: 763-843-0427   
Fax: 763-843-0421  

3. Project Address: 6200 Interlachen Blvd   
City: Edina   
State: MN   
Zip: 55436  
Qtr Section(s):  
Section(s): 11  
Township(s): 721  
Range(s): 22  
Lot:  
Block:  
Subdivision: t  
PID: 291722200  

4. Size of project parcel (square feet or acres): 76.36
Area of disturbance (square feet): 5.04  
Volume of excavation/fill (cubic yards): 5,100 cut  
Area of existing impervious surface: 1.56  
Area of proposed impervious surface: 2.52  
Length of shoreline affected (feet):  
Waterbody (& bay if applicable):  

5. Type of permit being applied for (Check all that apply):
☐ EROSION CONTROL  
☐ FLOODPLAIN ALTERATION  
☐ WETLAND PROTECTION  
☐ DREDGING  
☐ SHORELINE/STREAMBANK STABILIZATION  
☐ WATERBODY CROSSINGS/STRUCTURES  
☐ STORMWATER MANAGEMENT  
☐ APPROPRIATIONS  
☐ ILLICIT DISCHARGE  

6. Project purpose (Check all that apply):
☐ SINGLE FAMILY HOME  
☐ ROAD CONSTRUCTION  
☐ UTILITIES  
☐ DREDGING  
☐ SHORELINE/STREAMBANK STABILIZATION  
☐ MULTI FAMILY RESIDENTIAL (apartments)  
☐ COMMERCIAL or INSTITUTIONAL  
☐ SUBDIVISIONS (include number of lots)  
☐ LANDSCAPING (pools, berms, etc.)  
☐ OTHER (DESCRIBE):  

7. NPDES/SDS General Stormwater Permit Number (if applicable):  

8. Waterbody receiving runoff from site: Wetland northeast of proposed parking lot and Mirror Lake South of site  

9. Project Timeline:  
Start Date: October 2021  
Completion Date: October 2022  

Permits have been applied for:  
City ☐ County ☐ MN Pollution Control Agency ☐ DNR ☐ COE ☐  

Permits have been received:  
City ☐ County ☐ MN Pollution Control Agency ☐ DNR ☐ COE ☐  

By signing below, I hereby request a permit to authorize the activities described herein. I certify that I am familiar with MCWD Rules and that the proposed activity will be conducted in compliance with these Rules. I am familiar with the information contained in this application and, to the best of my knowledge and belief, all information is true, complete and accurate. I understand that proceeding with work before all required authorizations are obtained may be subject to federal, state and/or local administrative, civil and/or criminal penalties.

Signature of Each Property Owner  

Date 3/24/21  

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Hi Abigail:

Hope you had a good weekend. Did you receive the check for the records request? Please let me know when I can pick up the flash drive. It would be very helpful to have before the meeting on Aug 26.

I am planning to log in to Thursday’s meeting. Can you please share the meeting details? Thank you!

Please share the following comments with the Board of Managers for consideration.

Thank you!
Debra

Dear Board of Managers:

Thank you for the opportunity to provide comments regarding Interlachen Country Club’s proposal to expand its boundary to build a new 100+ stall parking lot and accessory structure. I am an adjacent property owner and am very concerned about the impacts of the new parking lot on the area and the watershed.

The parking lot construction includes demolishing homes and grading the properties. These properties are part of the neighborhood drain tile system that empties into a basin on my property. The parking lot is proposed to be built up substantially from the current gradual slope. The drain tile basin is at a low point on my property, and will be many feet below the parking lot if constructed. Unless there are somehow plans to rework the drain tile system such that it still operates in its current condition, this project will absolutely impact all of the storm water drainage in our neighborhood and have consequences for all landowners currently using the system as well as consequences to the wetlands. None of the neighbors have been consulted on the storm water impacts or approached about how to manage such that we can preserve our current properties and the environment.

Further, the country club’s proposed catch basin on Waterman Avenue to the north side of the parking lot site will abut my property. My backyard is a native prairie and includes designated wetlands. The tearing down of trees, coupled with the changes to the topography, would create a situation destined for storm water and erosion issues. It will also adversely impact the wetland wildlife, including the many pollinators, ducks, deer and other animals.

Please consider all of the impacts of the proposed project and the negative impacts it will have on the area as part of your review.

Thank you for considering and for all you do for our community.

Regards,
Debra Frimerman
6229 Maloney Ave
Edina, MN 55343