

Minnesota Wetland Conservation Act Notice of Decision

Local Government Unit: City of Plymouth		County: Hennepin	
Applicant Name: Hollydale Golf Course Development, Inc .		Applicant Representative: Nick McCabe, ISG	
Project Name: Hollydale Golf Course		LGU Project No. (if any): 2019-13	
Date Complete Application Received by LGU: 10/09/19			
Date of LGU Decision: December 13, 2019			
Date this Notice was Sent: December 13, 2019			

WCA Decision Type - check all that apply

<input type="checkbox"/> Wetland Boundary/Type	<input type="checkbox"/> Sequencing	<input type="checkbox"/> Replacement Plan	<input type="checkbox"/> Bank Plan (not credit purchase)
<input checked="" type="checkbox"/> No-Loss (8420.0415)	<input type="checkbox"/> Exemption (8420.0420)		
Part: <input type="checkbox"/> A <input type="checkbox"/> B <input type="checkbox"/> C <input type="checkbox"/> D <input type="checkbox"/> E <input type="checkbox"/> F <input type="checkbox"/> G <input type="checkbox"/> H		Subpart: <input type="checkbox"/> 2 <input type="checkbox"/> 3 <input type="checkbox"/> 4 <input type="checkbox"/> 5 <input type="checkbox"/> 6 <input type="checkbox"/> 7 <input type="checkbox"/> 8 <input type="checkbox"/> 9	

Replacement Plan Impacts (replacement plan decisions only)

Total WCA Wetland Impact Area:	
Wetland Replacement Type:	<input type="checkbox"/> Project Specific Credits: <input type="checkbox"/> Bank Credits:
Bank Account Number(s):	

Technical Evaluation Panel Findings and Recommendations (attach if any)

<input checked="" type="checkbox"/> Approve <input type="checkbox"/> Approve w/Conditions <input type="checkbox"/> Deny <input type="checkbox"/> No TEP Recommendation
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LGU Decision

<input type="checkbox"/> Approved with Conditions (specify below) ¹ List Conditions:	<input checked="" type="checkbox"/> Approved ¹	<input type="checkbox"/> Denied
Decision-Maker for this Application: <input checked="" type="checkbox"/> Staff <input type="checkbox"/> Governing Board/Council <input type="checkbox"/> Other:		
Decision is valid for: <input checked="" type="checkbox"/> 5 years (default) <input type="checkbox"/> Other (specify):		

¹ *Wetland Replacement Plan approval is not valid until BWSR confirms the withdrawal of any required wetland bank credits. For project-specific replacement a financial assurance per MN Rule 8420.0522, Subp. 9 and evidence that all required forms have been recorded on the title of the property on which the replacement wetland is located must be provided to the LGU for the approval to be valid.*

LGU Findings – Attach document(s) and/or insert narrative providing the basis for the LGU decision¹.

<input type="checkbox"/> Attachment(s) (specify): <input checked="" type="checkbox"/> Summary: Applicant requested a No-Loss determination for delineated wetlands 1, 2, 3, and 8 on the 158.65-acre Hollydale Golf Course property in Plymouth, MN. The applicant’s memorandum (prepared by Kjolhaug Environmental Services, dated October 9, 2019) claims these wetlands were historically excavated within upland areas, and therefore are not regulated under the WCA (“incidental wetlands” per MN Rules 8420.0105 Subp. 2D) and Section 404 Clean Water Act. Additional information was requested from the TEP at the October 11th meeting to further clarify/support the applicant’s claim of incidental wetlands to the satisfaction of the LGU. The applicant’s consultant is prepared a second submittal for TEP review dated November 18,
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2019. The second memorandum showed sufficient evidence that Wetlands 1, 2, 3, and 8 were excavated in upland landscape positions based on a historic aerial photograph review and soil survey data.

¹ Findings must consider any TEP recommendations.

Attached Project Documents

Site Location Map Project Plan(s)/Descriptions/Reports (specify): Figure 2 – Existing Conditions Map

Appeals of LGU Decisions

If you wish to appeal this decision, you must provide a written request within 30 calendar days of the date you received the notice. All appeals must be submitted to the Board of Water and Soil Resources Executive Director along with a check payable to BWSR for \$500 *unless* the LGU has adopted a local appeal process as identified below. The check must be sent by mail and the written request to appeal can be submitted by mail or e-mail. The appeal should include a copy of this notice, name and contact information of appellant(s) and their representatives (if applicable), a statement clarifying the intent to appeal and supporting information as to why the decision is in error. Send to:

Appeals & Regulatory Compliance Coordinator
Minnesota Board of Water & Soils Resources
520 Lafayette Road North
St. Paul, MN 55155
travis.germundson@state.mn.us

Does the LGU have a local appeal process applicable to this decision?

Yes¹ No

¹If yes, all appeals must first be considered via the local appeals process.

Local Appeals Submittal Requirements (LGU must describe how to appeal, submittal requirements, fees, etc. as applicable)

Notice Distribution (include name)

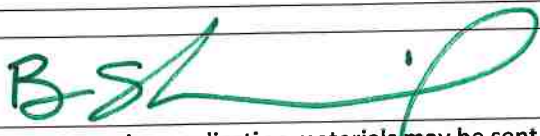
Required on all notices:

<input checked="" type="checkbox"/> SWCD TEP Member: Stacey Lijewski	<input checked="" type="checkbox"/> BWSR TEP Member: Ben Carlson
<input checked="" type="checkbox"/> LGU TEP Member (if different than LGU contact): Ben Scharenbroich	
<input checked="" type="checkbox"/> DNR Representative: Leslie Parris	
<input checked="" type="checkbox"/> Watershed District or Watershed Mgmt. Org.: Bassett Creek WMC, c/o Laura Jester, Keystone Waters LLC	
<input checked="" type="checkbox"/> Applicant (notice only): Jake Walesch	<input checked="" type="checkbox"/> Agent/Consultant (notice only): Nick McCabe, ISG

Optional or As Applicable:

<input type="checkbox"/> Corps of Engineers:
<input type="checkbox"/> BWSR Wetland Mitigation Coordinator (required for bank plan applications only):
<input checked="" type="checkbox"/> Members of the Public (notice only): Adam Cameron, Kjolhaug Environmental Services Company <input type="checkbox"/> Other:

Signature:



Date: 12/13/2019

This notice and accompanying application materials may be sent electronically or by mail. The LGU may opt to send a summary of the application to members of the public upon request per 8420.0255, Subp. 3.



KJOLHAUG ENVIRONMENTAL SERVICES COMPANY

Providing Sound, Balanced, Comprehensive Natural Resource Solutions

Memorandum

Date: November 18, 2019

To: Regulatory, U.S. Army Corps of Engineers
Nick McCabe, ISG
Ben Scharenbroich, City of Plymouth

Cc: Jake Walesch, Project Applicant
Ben Carlson, Board of Water and Soil Resources (BWSR)
Stacey Lijewski, Hennepin County

From: Adam Cameron, Kjolhaug Environmental Services Company (KES)
Rob Bouta, Kjolhaug Environmental Services Company

Re: Hollydale Golf Course, WCA/CWA Jurisdictional Summary
KES Project #2019-118

The 156.7-acre Hollydale Golf Course was inspected on August 14, 2019 by Kjolhaug Environmental Services (KES) staff to delineate wetlands on the subject property. The property was located in Section 8, Township 118 North, Range 22 West, City of Plymouth, Hennepin County, Minnesota. The site was situated north of MN State Highway 55, west of Vicksburg Lane North (**Figure 1**). The property corresponded to the following Hennepin County PID's: 0811822340014 and 0811822310001. The Hollydale Golf Course Wetland Delineation Report was submitted to the City of Plymouth and the U.S. Army Corps of Engineers on September 27, 2019.

The Hollydale Golf Course contains numerous excavated ponds that were created during the construction of the course, and during ongoing maintenance of the course. This memo is intended to address the status of wetlands on the subject property by providing a review of historic photos and soil survey data, as well as a summary of the anticipated regulatory status of the ornamental ponds under the Minnesota Wetland Conservation Act (WCA) and Section 404 of the Clean Water Act (CWA). The Joint Application Form has been included as **Appendix A**.

No-Loss Request & Review of Figures

Historic photos showing the site conditions from 1937 through 1971 have been included to document the site conditions prior to, during and after conversion of the subject property from

agricultural land to a golf course (**Appendix B**). As a part of construction of the golf course, ornamental ponds were excavated within areas of the site that appear to have been upland prior to pond construction. Therefore, the areas surrounding Wetland 1, 2, 3, 8 and 9 were assessed to determine whether the wetlands delineated in 2019 correspond with historic wetland. Historic aerial photography for ten years prior to construction of the golf course was assessed for wetland signatures. Photo interpretation and precipitation information (Based upon 3-Month Gridded Database) is provided below in **Table 1**.

Table 1. Aerial Photo Assessment for Wetland Signatures

Photo Date & Precipitation Conditions	WL 1	WL 2	WL 3	WL 8	WL 9	Comments
*September 8, 1937 Dry	NV	NV	NV	NV	NV	No wetland signatures observed.
*July 30, 1940 Normal	NV	NV	NV	CS/SS (1)	CS (1)	Signatures observed at the location of WL 8 and WL 9.
**May 8, 1945 Wet	NV/CS (1)	NV	NV/CS (1)	NV	NV/NC (2)	Signatures observed at the location of WL 1, WL 3 and WL 9.
*May 8, 1947 Normal	NV/CS (2)	NV	NV	NV	SS (3)	Signatures observed at the location of WL 1 and WL 9.
*October 15, 1953 Normal	NV	NV	NV	DO (2)	CS (4)	Signatures observed at the location of WL 8 and WL 9.
**May 7, 1956 Dry	NV	NV	NV	NV	NV	No wetland signatures observed.
*May 6, 1957 Dry	NV	NV	NV	NV	NV	No wetland signatures observed.
**May 8, 1960 Dry	NV	NV	NV	CS (3)	NV	Signature observed at the location of WL 8.
**April 23, 1962 Normal	CS/NV (3)	NV	NV	NV	DO/NV (5)	Signature observed at the location of WL 1 and WL 9.
*October 14, 1964 Wet	NV	NV	NV	NV	NV	No wetland signatures observed.
**November 18, 1967 Normal	N/A	N/A	N/A	N/A	N/A	Site has been converted to golf course.
Number of Years Assessed	10	10	10	10	10	-
Years Showing Wetland Signatures	3	0	1	3	5	-
Percent of Years Showing Wetland Signatures	30%	0%	10%	30%	50%	-
Wetland Determination	Historic Upland	Historic Upland	Historic Upland	Historic Upland	Historic Wetland	Wetland 1, 2, 3 and 8 were determined to be incidentally created in historic upland.

*Photo date provided by Historical Information Gatherers.

** Photo date provided by Minnesota Historical Aerial Photographs Online.

Historic Aerial Photography Review Summary

Wetland 1 is an artificial ornamental golf course pond excavated on dry land primarily for aesthetic reasons. Wetland 1 first appeared on aerial photography in 1984 after the area had been farmed, ditched, and drained. The golf course ponds have been maintained and have not been abandoned. Wetland 1 was expanded between 1984 and 1991 to provide a larger ornamental pond. Wetland 1 is located on soils mapped as Lester loam (2% hydric), Hamel complex (45% hydric) and Houghton muck (100% hydric) (See **Figure 3**). On average, these soil types are considered 49% hydric. This implies that the chance that Wetland 1 was excavated on dry land is greater than 50% because the mapped soil types are on average more likely than not to occupy upland landscape positions. This area was reviewed on historic aerial images, and showed wetland signatures in only 30% of years reviewed. Therefore, this area was determined to be non-wetland prior to conversion of the site to a golf course.

Wetland 2 is an artificial ornamental golf course pond excavated on dry land primarily for aesthetic reasons. Wetland 2 is believed to have been excavated from upland between 1984 and 1991, the time when Wetland 1 was expanded. Wetland 1 first appeared after the area had been farmed, ditched, drained, and converted to a golf course. The golf course ponds have been maintained and have not been abandoned. Wetland 2 is located on soils mapped as Hamel complex, which is considered 45% hydric. This implies that the chance that Wetland 2 was excavated on dry land is greater than 50% because most Hamel soils occupy upland landscape positions. This area was reviewed on historic aerial images, and showed wetland signatures in 0% of years reviewed. Therefore, this area was determined to be non-wetland prior to conversion of the site to a golf course.

Wetland 3 is an artificial ornamental golf course pond excavated on dry land primarily for aesthetic reasons. Wetland 3 first appeared on aerial photography in 1991 after the area had been farmed, ditched, drained, and converted to golf course. The golf course ponds have been maintained and have not been abandoned. Wetland 3 is located on soils mapped as Lester loam, which are considered only 2% hydric and generally occupy upland landscape positions. This area was reviewed on historic aerial images, and showed wetland signatures in only 10% of years reviewed. Therefore, this area was determined to be non-wetland prior to conversion of the site to a golf course.

Wetland 8 is an artificial ornamental golf course pond excavated on dry land primarily for aesthetic reasons. Wetland 8 first appeared on aerial photography in 1967, after golf construction in 1965. Prior to that, the area had been farmed. Wetland 8 is located on soils mapped as Angus and Nessel loams, which are considered only 5 and 10% hydric, respectively. This implies that Wetland 8 was excavated on dry land incidental to construction activity, the purpose of which was to create an ornamental golf course pond. This area was reviewed on historic aerial images, and showed wetland signatures in only 30% of years reviewed. Therefore, this area was determined to be non-wetland prior to conversion of the site to a golf course.

Wetland 9 is an artificial ornamental golf course pond, which first appeared on aerial photography in 1967 after golf construction in 1965. Wetland 9 is located on soils mapped as Glencoe clay loam and Minnetonka silty clay loam, which are both considered 100% hydric.

This area was reviewed on historic aerial images, and showed wetland signatures in 50% of years reviewed. Therefore, this area was determined to be historic wetland.

Wetland 7 was excavated within a Klossner Muck soil unit that appeared to be wetland on historic photos prior to conversion of the site to a golf course. Therefore, Wetland 7 was determined to be historic wetland.

Minnesota Wetland Conservation Act: Incidental Wetlands Determination

Based on a review of historic aerial photos dating back to 1937, KES has concluded that Wetland 1, 2, 3 and 8 were incidentally created in upland and are therefore not regulated under WCA according to MN WCA Rule 8420.0105 SCOPE Subp. 2.D. which states the following:

“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 Joint Application Form requesting a No-Loss under WCA has been included as **Appendix A**.

Section 404 of the Clean Water Act: Jurisdictional Summary

We evaluated delineated wetlands using the definition of waters of the United States set forth under [33 CFR Part 328.3](#) (November 13, 1986) to assess the potential for federal regulatory jurisdiction. This definition indicates the following are generally not considered to be waters of the United States:

1. Non-tidal drainage and irrigation ditches excavated on dry land.
2. Artificially irrigated areas which would revert to upland if the irrigation ceased.
3. Artificial lakes or ponds created by excavating and/or diking dry land to collect and retain water and which are used exclusively for such purposes as stock watering, irrigation, settling basins, or rice growing.
4. Artificial reflecting or swimming pools or other small ornamental bodies of water created by excavating and/or diking dry land to retain water for primarily aesthetic reasons.
5. Waterfilled depressions created in dry land incidental to construction activity and pits excavated in dry land for the purpose of obtaining fill, sand, or gravel unless and until the construction or excavation operation is abandoned and the resulting body of water meets the definition of waters of the United States.

Based on the exclusions listed above, we submit that Wetlands 1, 2, 3 and 8 are not waters of the United States. We understand the definition of waters of the United States cited above will become effective in Minnesota on November 11, 2019, and assume the Corps will complete an Approved Jurisdictional Determination (AJD) in response to this request after that date.

The project area does not include any ditches, tributaries, or other watercourses located outside the limits of delineated wetlands, as all ditches and watercourses outside of wetlands have been placed into buried pipes and drain tile lines. Therefore, we believe that the AJD will only need to address Wetlands 1 to 9. Small wetlands on the site appear to be connected to large wetlands and downstream waters via buried pipes and drain tiles (see **Figure 2**).

Approvals Requested

At this time we are requesting a Notice of Decision under WCA for the No-Loss Application, and a letter from the U.S. Army Corps of Engineers confirming our determination of the jurisdictional status of Wetland 1, 2, 3 and 8 as unregulated. If you have any questions regarding this application, please do not hesitate to contact us.

Thank you.

Hollydale Golf Course

WCA/CWA Jurisdictional Summary

Figure 1 – Site Location Map

Figure 2 – Existing Conditions Map

Figure 3 – Soil Survey Overlay Map

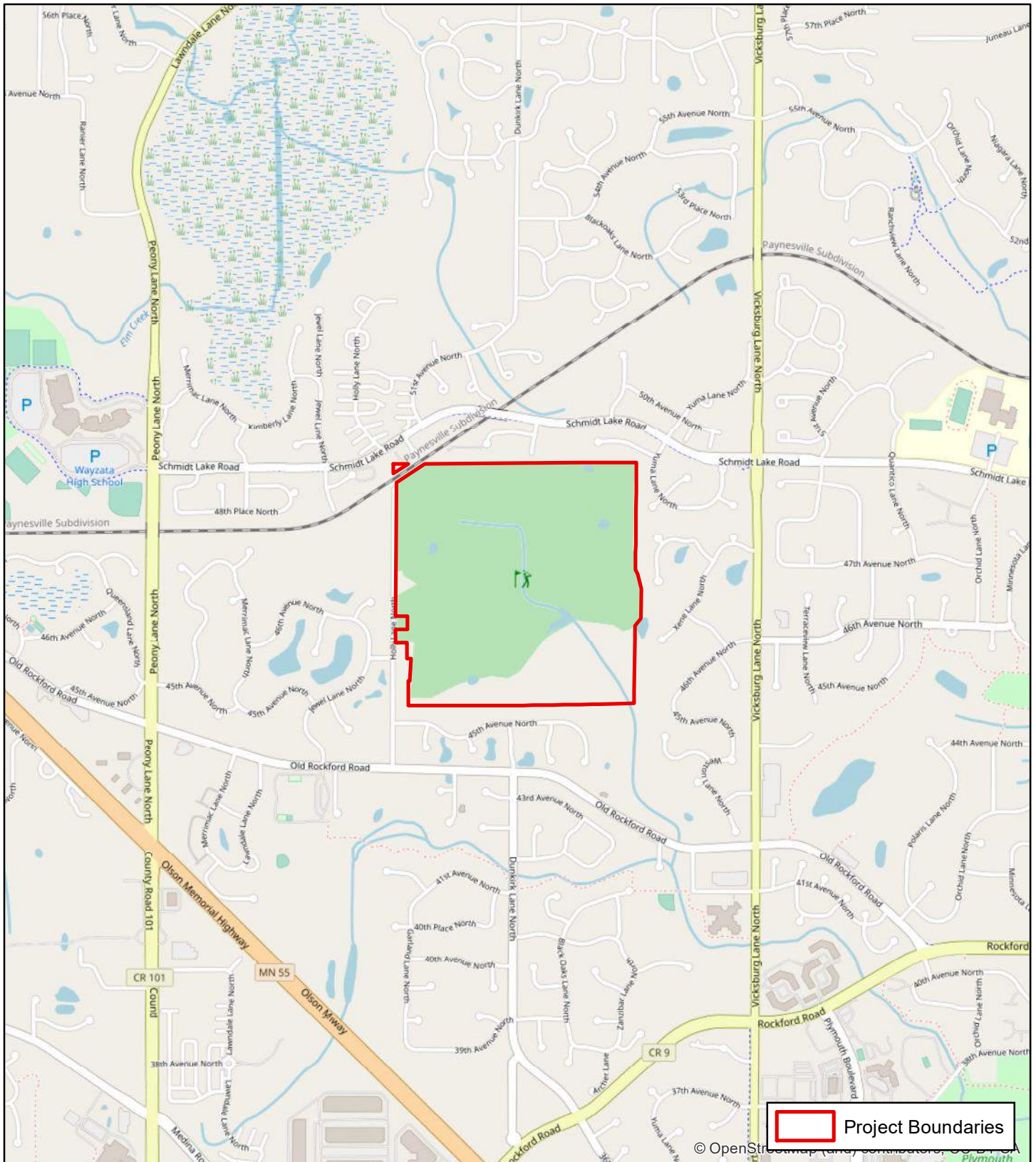


Figure 1 - Site Location Map



0 1,500
Feet

Hollydale Golf Course (KES 2019-113)
Plymouth, Minnesota

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



KJOLHAUG ENVIRONMENTAL SERVICES COMPANY
Source: ESRI Streets Basemap

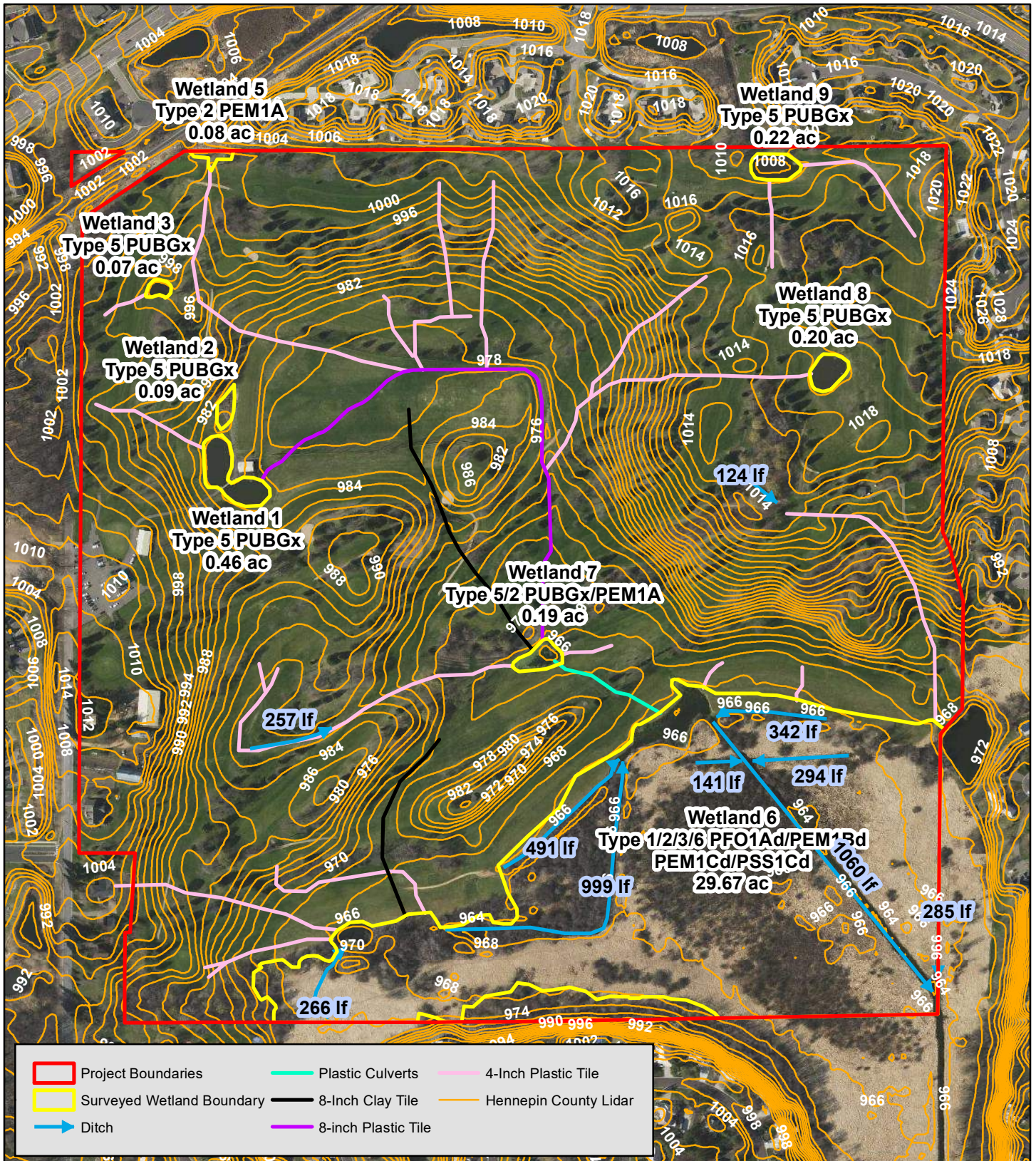


Figure 2 - Existing Conditions (2016 MNGEO Photo)



N

0 400



Feet

Hollydale Golf Course (KES 2019-113)
Plymouth, Minnesota



KJØLHAUG ENVIRONMENTAL SERVICES COMPANY

Source: MNGEO Spatial Commons

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

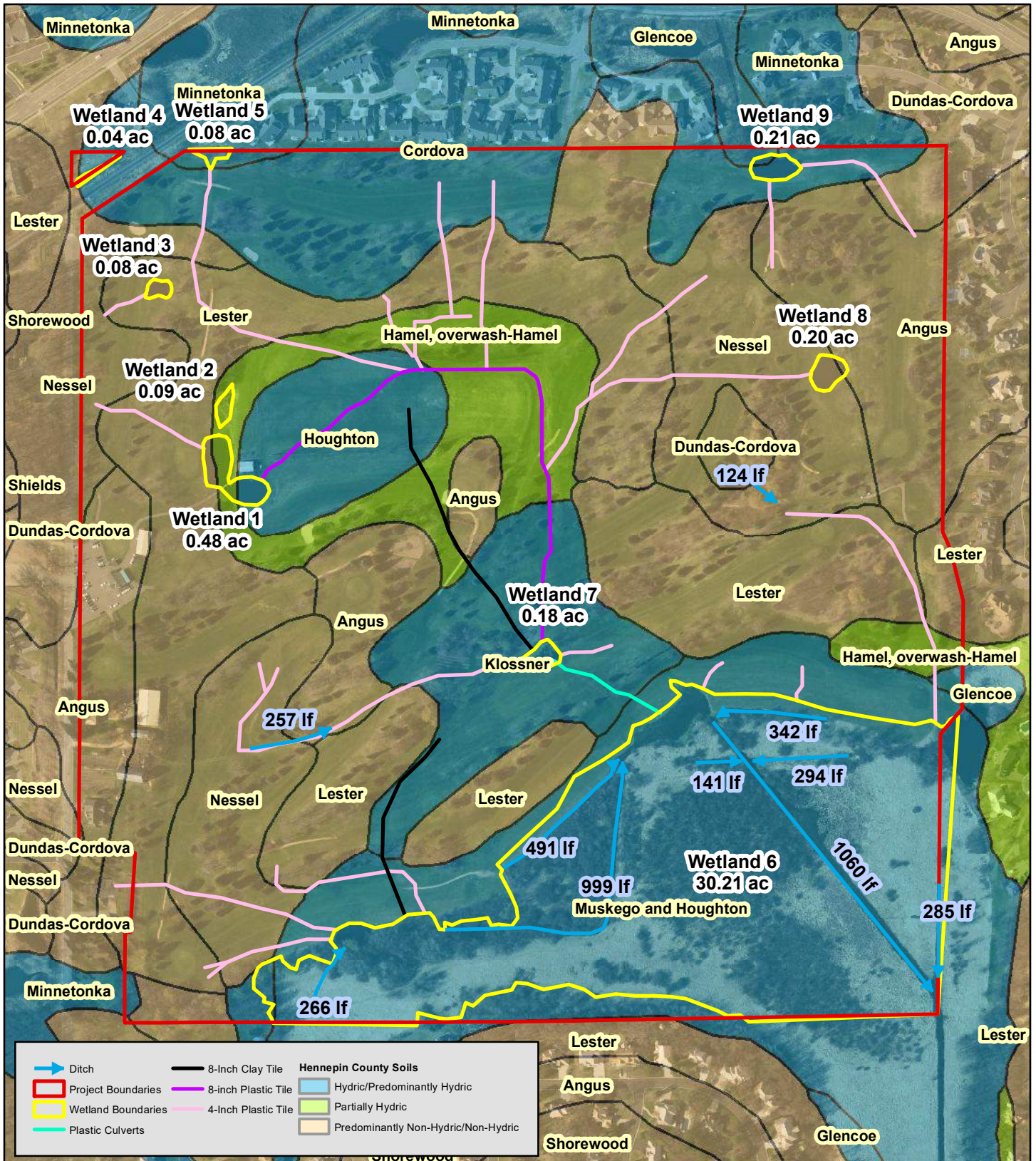


Figure 3 - Soil Survey Overlay Map



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Feet

Hollydale Golf Course (KES 2019-113)
Plymouth, Minnesota

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



KJØLHAUG ENVIRONMENTAL SERVICES COMPANY

Source: MNGEO Spatial Commons, Web Soil Survey

Hollydale Golf Course

WCA/CWA Jurisdictional Summary

Appendix A: Joint Application Form

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: ~~Jake Walesch~~ Hollydale GG Development, Inc.
Mailing Address: 10850 Old County Road 15, Suite 200, Plymouth MN 55441
Phone: 612-749-1360
E-mail Address: Jake@Jakewalesch.com

Authorized Contact (do not complete if same as above):

Mailing Address:

Phone:

E-mail Address:

Agent Name: Adam Cameron

Mailing Address: 2500 Shadywood Road #130, Orono MN 55331

Phone: 952-401-8757 Ext. #106

E-mail Address: Adam@kjolhaugenv.com

PART TWO: Site Location Information

County: Hennepin

City/Township: Plymouth

Parcel ID and/or Address: 0811822340014, 0811822310001

Legal Description (Section, Township, Range): S:8 T:118N R:22W

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): 156.7

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

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.

PART FOUR: Aquatic Resource Impact¹ 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) ¹	Size of Impact ²	Overall Size of Aquatic Resource ³	Existing Plant Community Type(s) in Impact Area ⁴	County, Major Watershed #, and Bank Service Area # of Impact Area ⁵

¹If 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)".

²Impacts 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).

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

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

⁵Refer 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.

Hollydale GC Development, Inc.
 Signature: *[Signature]* Date: *9/27/19*
Its: President

I hereby authorize Kjolhaug Environmental 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.

¹ 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:

Minnesota Wetland Conservation Act (WCA): 8420.0105 Subp. 2D.

Section 404 of the Clean Water Act (CWA): Seeking verification that ornamental ponds excavated in upland are not under CWA Jurisdiction.

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:

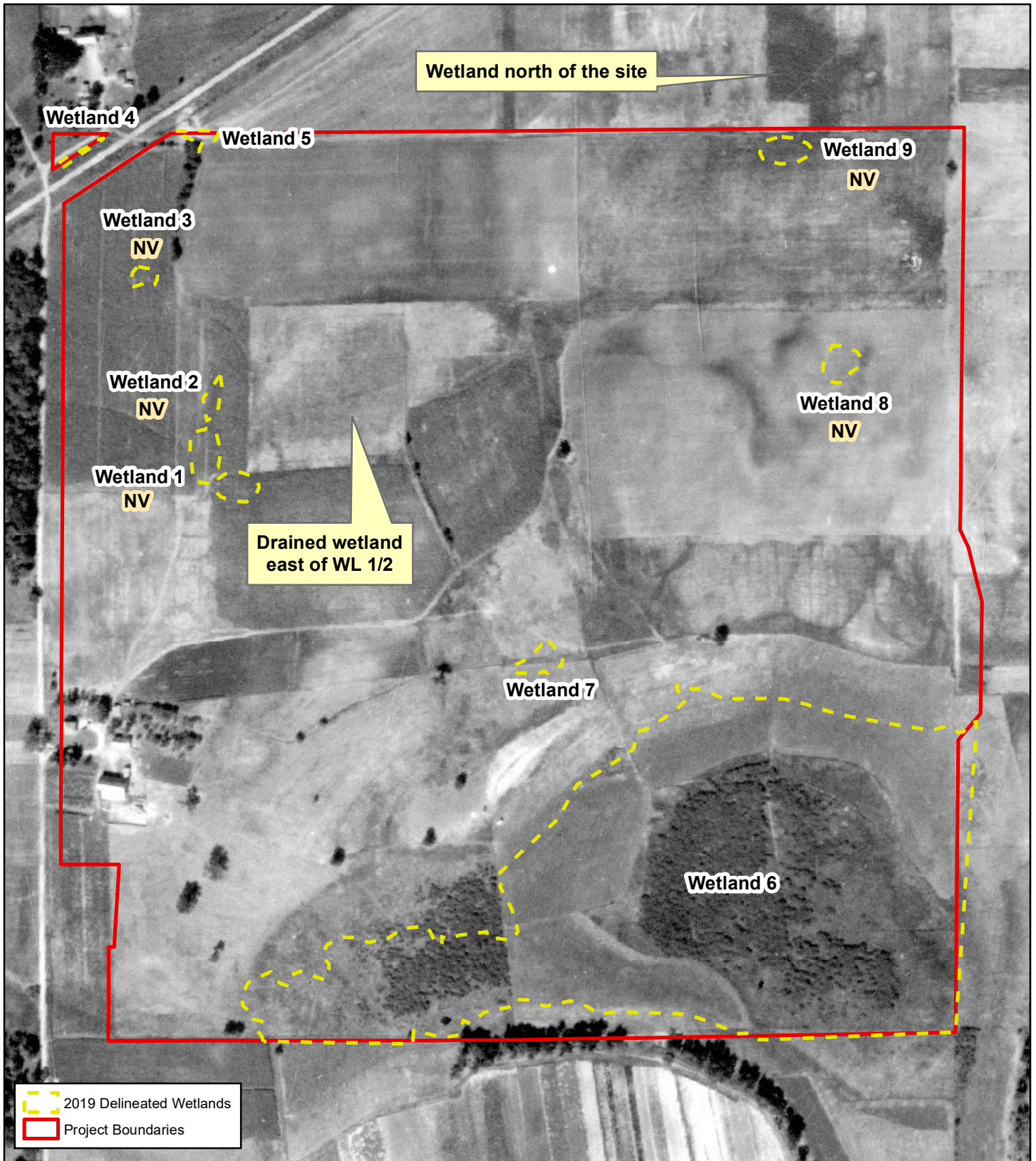
WCA: See the attached memo for the discussion of the ornamental ponds (incidentally created wetlands) present onsite.

CWA: See the attached memo for the discussion of the ornamental ponds present onsite.

Hollydale Golf Course

WCA/CWA Jurisdictional Summary

Appendix B: Historic Aerial Photos and USGS Topo Maps



Historic Aerial Photos (1937 MNGEO Photo)



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Feet

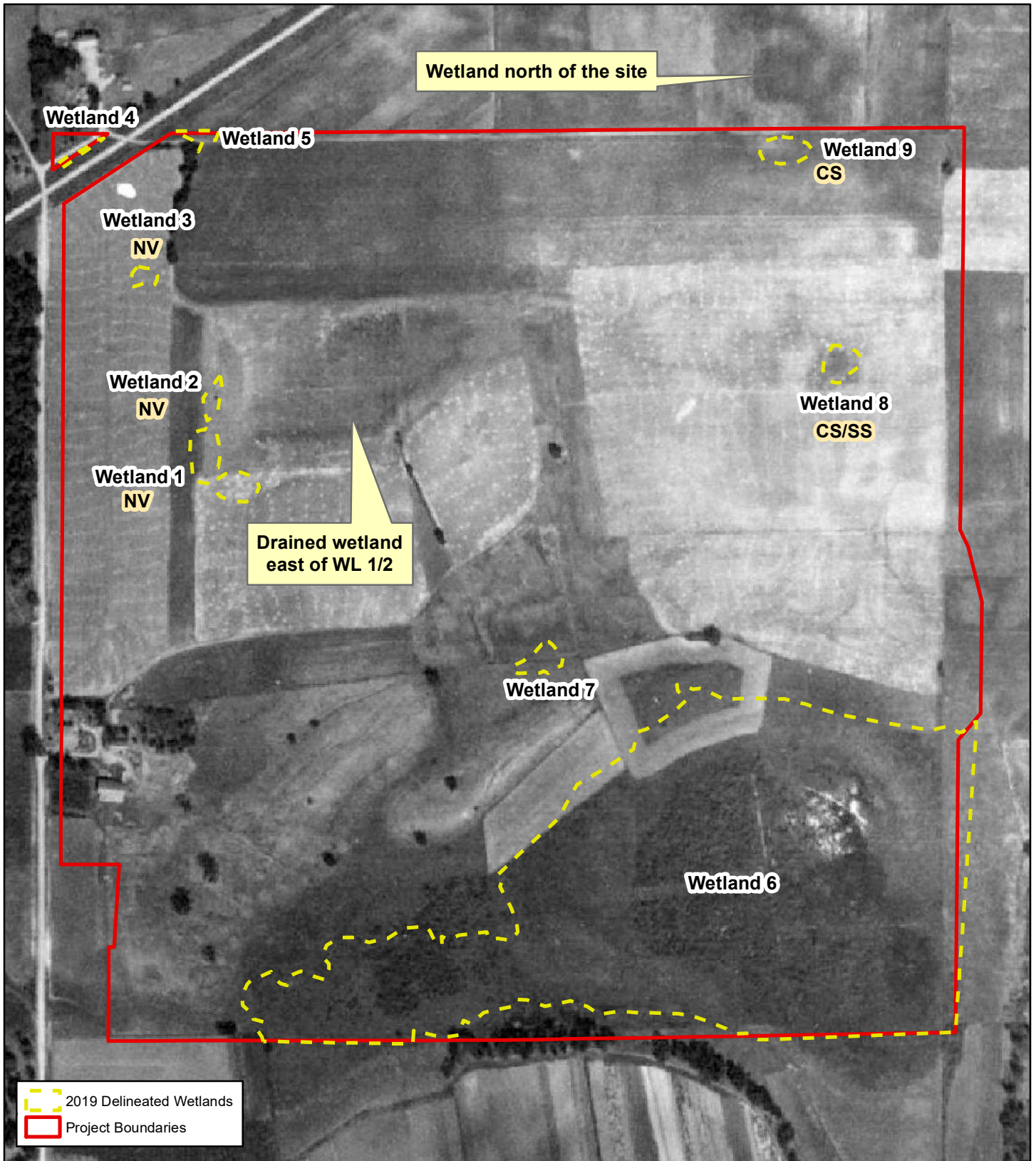
Hollydale Golf Course (KES 2019-113)
Plymouth, Minnesota

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

KJOLHAUG

ENVIRONMENTAL SERVICES COMPANY

Source: MNGEO Spatial Commons



Historic Aerial Photos (1940 Historical Photo)



N



0 400



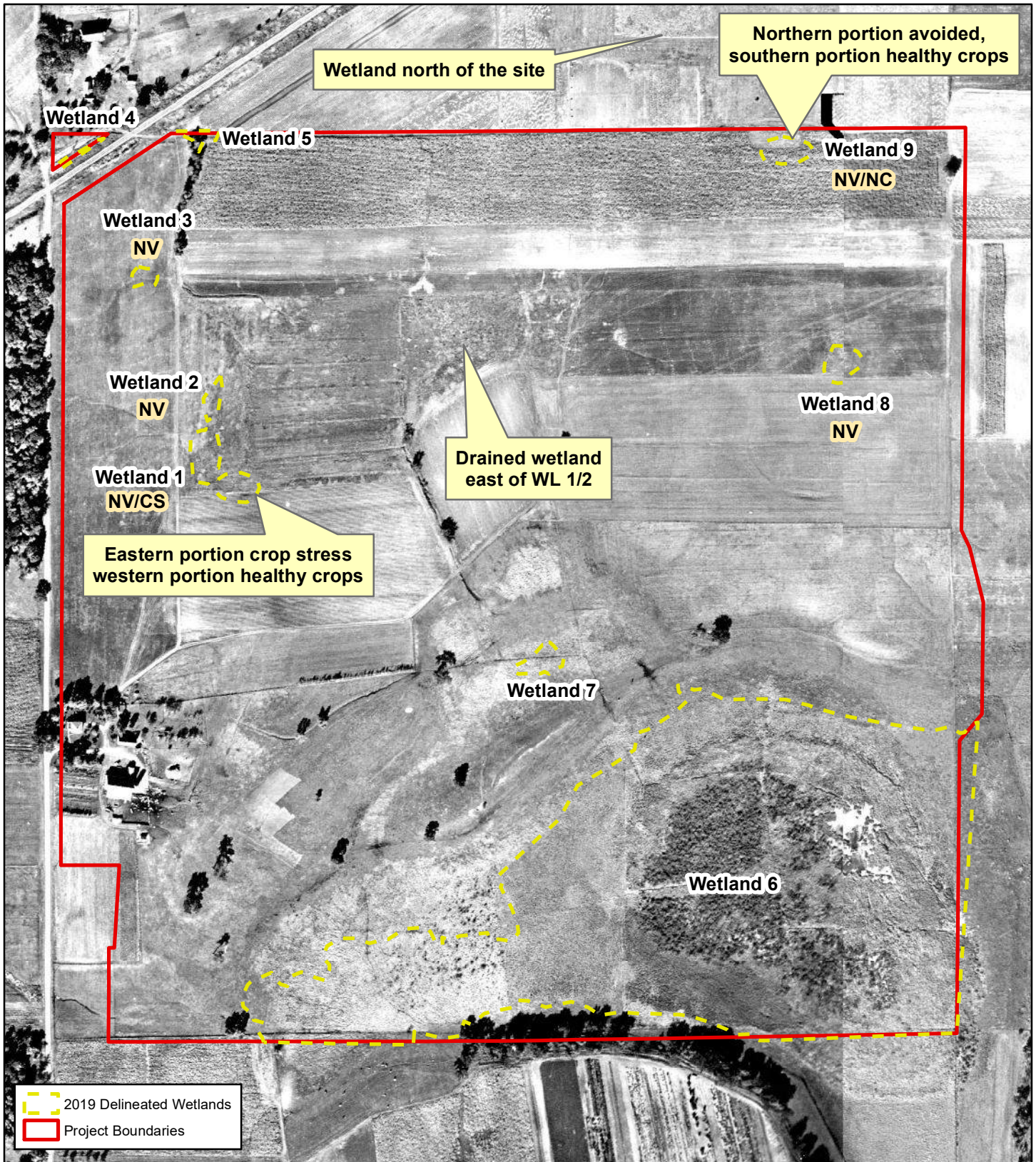
Feet

Hollydale Golf Course (KES 2019-113)
Plymouth, Minnesota

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

KJOLHAUG ENVIRONMENTAL SERVICES COMPANY

Source: Historical Information Gatherers (HIG)



Historic Aerial Photos (1945 MNGEO Photo)



N

0 400



Feet

Hollydale Golf Course (KES 2019-113)
Plymouth, Minnesota

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



KJOLHAUG ENVIRONMENTAL SERVICES COMPANY
 Source: MNGEO Spatial Commons



Historic Aerial Photos (1947 Historical Photo)



KJØLHAUG ENVIRONMENTAL SERVICES COMPANY

Source: Historical Information Gatherers (HIG)

N



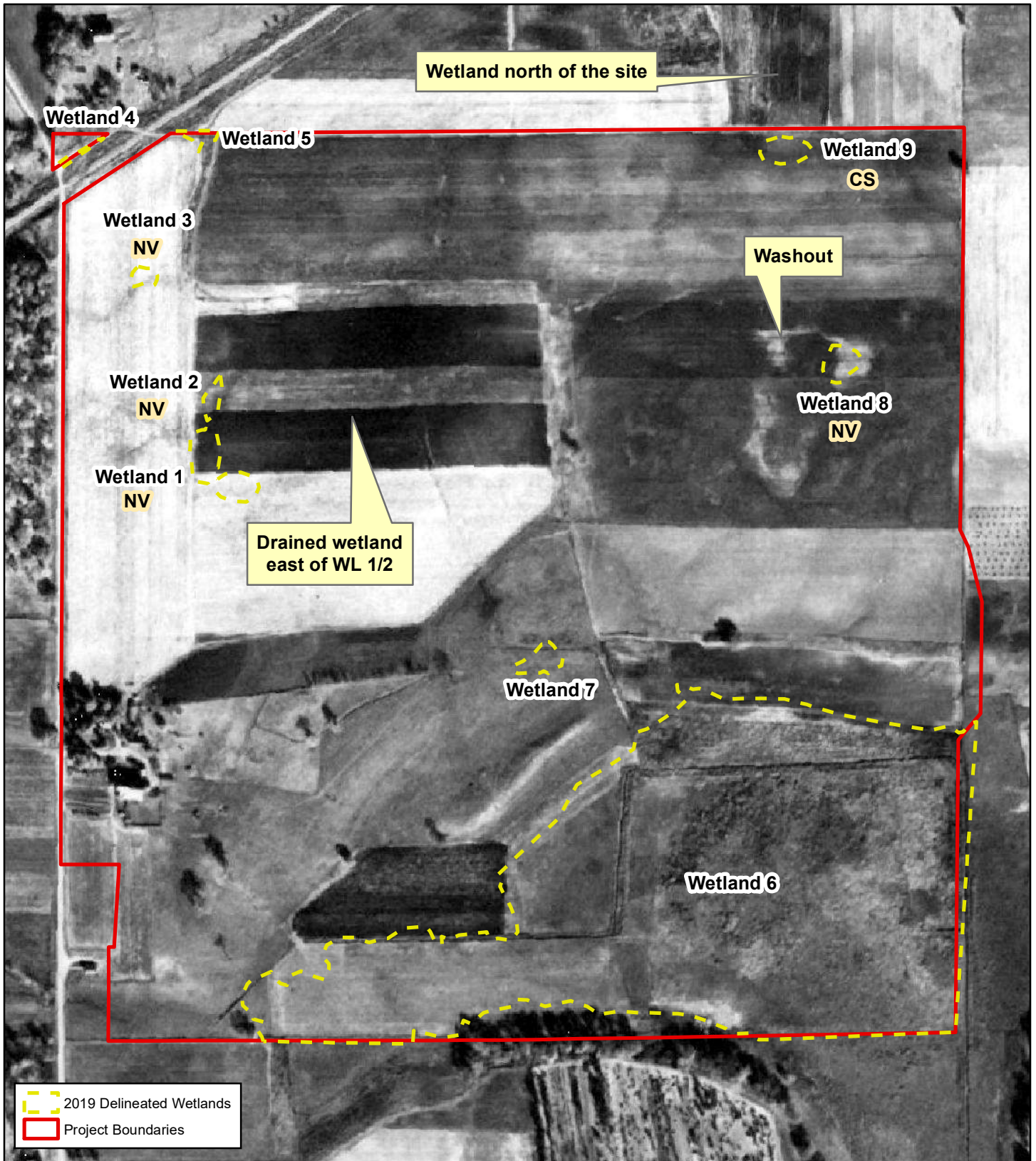
0 400



Feet

Hollydale Golf Course (KES 2019-113)
Plymouth, Minnesota

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



Historic Aerial Photos (1953 Historical Photo)



N



0 400 Feet

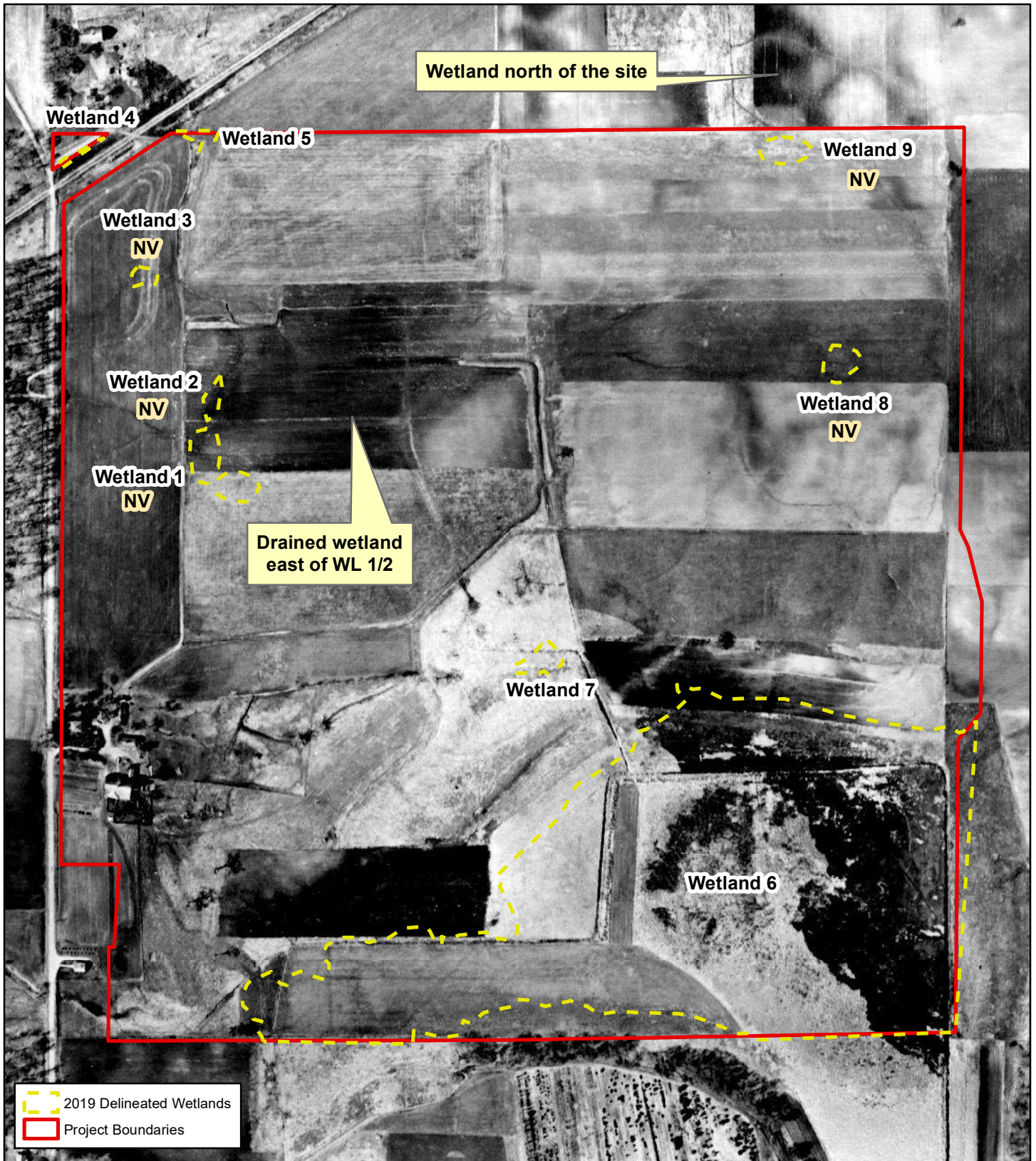


Hollydale Golf Course (KES 2019-113)
Plymouth, Minnesota

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

KJOLHAUG ENVIRONMENTAL SERVICES COMPANY

Source: Historical Information Gatherers (HIG)



Historic Aerial Photos (1956 MNGEO Photo)



KJØLHAUG ENVIRONMENTAL SERVICES COMPANY

Source: MNGEO Spatial Commons

N



0 400



Feet

Hollydale Golf Course (KES 2019-113)
Plymouth, Minnesota

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



Historic Aerial Photos (1957 Historical Photo)



N



0 400

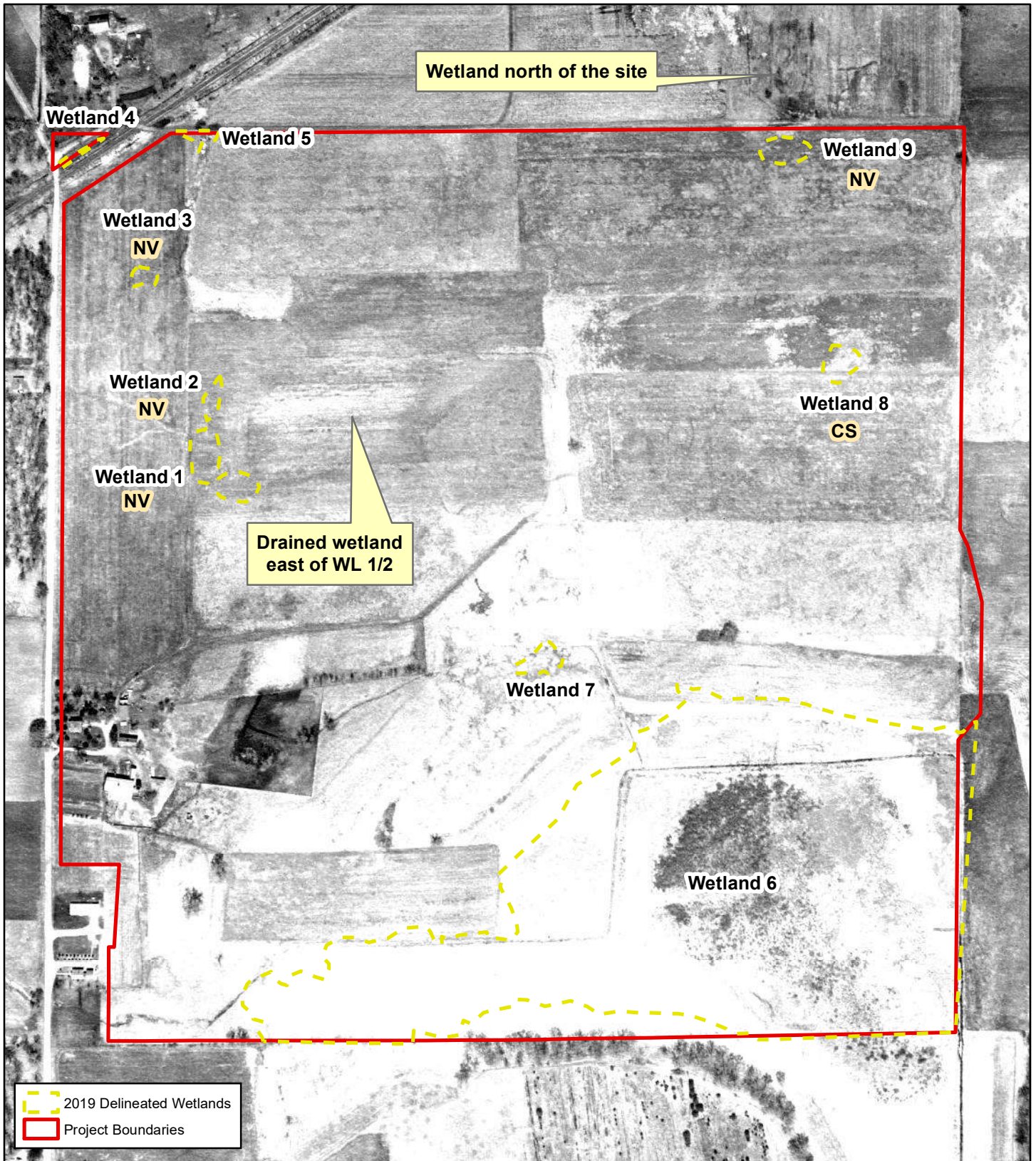


Feet

Hollydale Golf Course (KES 2019-113)
Plymouth, Minnesota

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

KJOLHAUG ENVIRONMENTAL SERVICES COMPANY
 Source: Historical Information Gatherers (HIG)



Historic Aerial Photos (1960 MNGEO Photo)



N

0 400



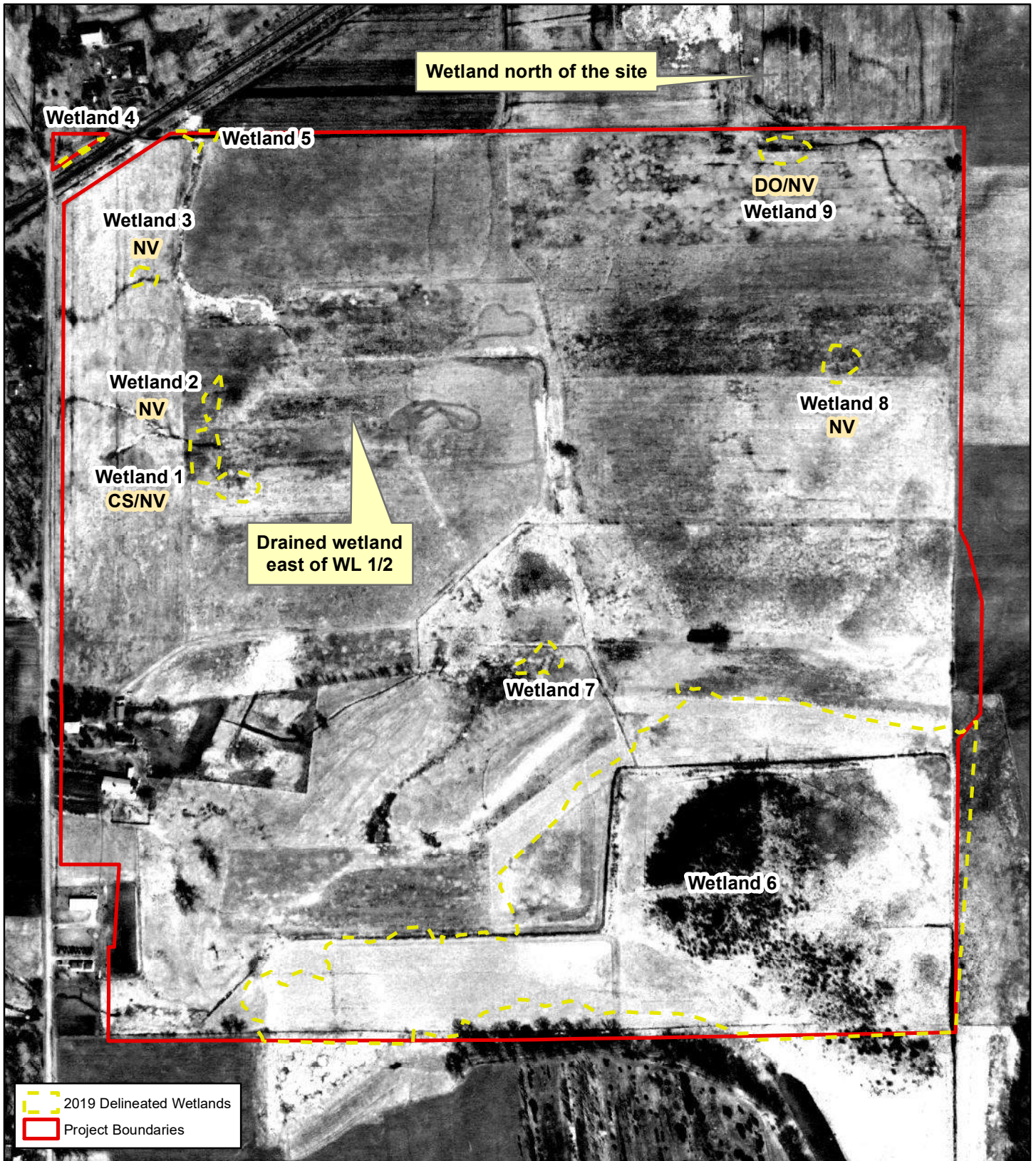
Feet

Hollydale Golf Course (KES 2019-113)
Plymouth, Minnesota



KJOLHAUG ENVIRONMENTAL SERVICES COMPANY
 Source: MNGEO Spatial Commons

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



Historic Aerial Photos (1962 MNGEO Photo)



N



0 400

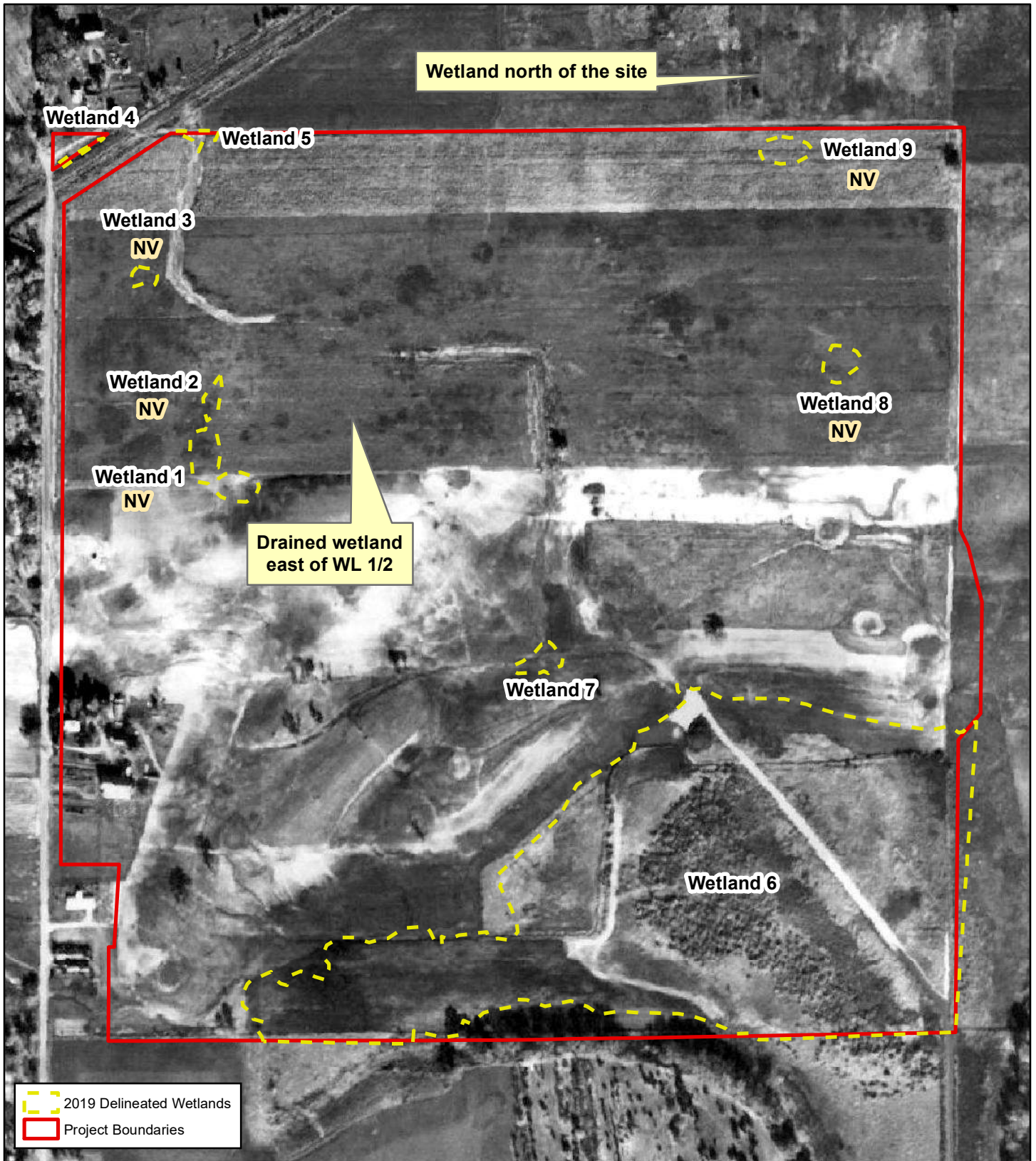


Feet

Hollydale Golf Course (KES 2019-113)
Plymouth, Minnesota

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KJOLHAUG ENVIRONMENTAL SERVICES COMPANY
 Source: MNGEO Spatial Commons



Historic Aerial Photos (1964 Historical Photo)



N



0 400

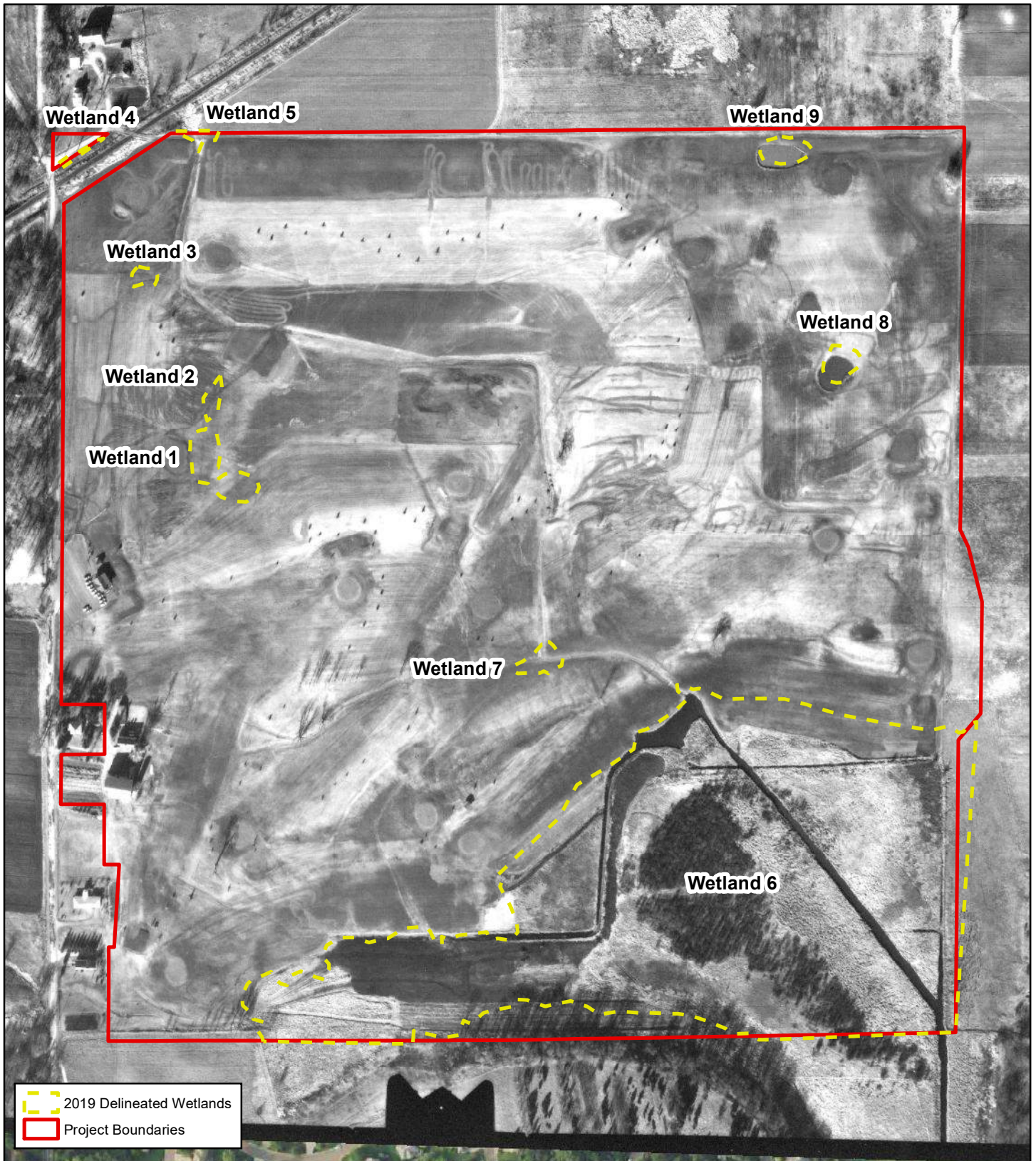


Feet

Hollydale Golf Course (KES 2019-113)
Plymouth, Minnesota

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KJOLHAUG ENVIRONMENTAL SERVICES COMPANY
 Source: Historical Information Gatherers (HIG)



Historic Aerial Photos (1967 MNGEO Photo)



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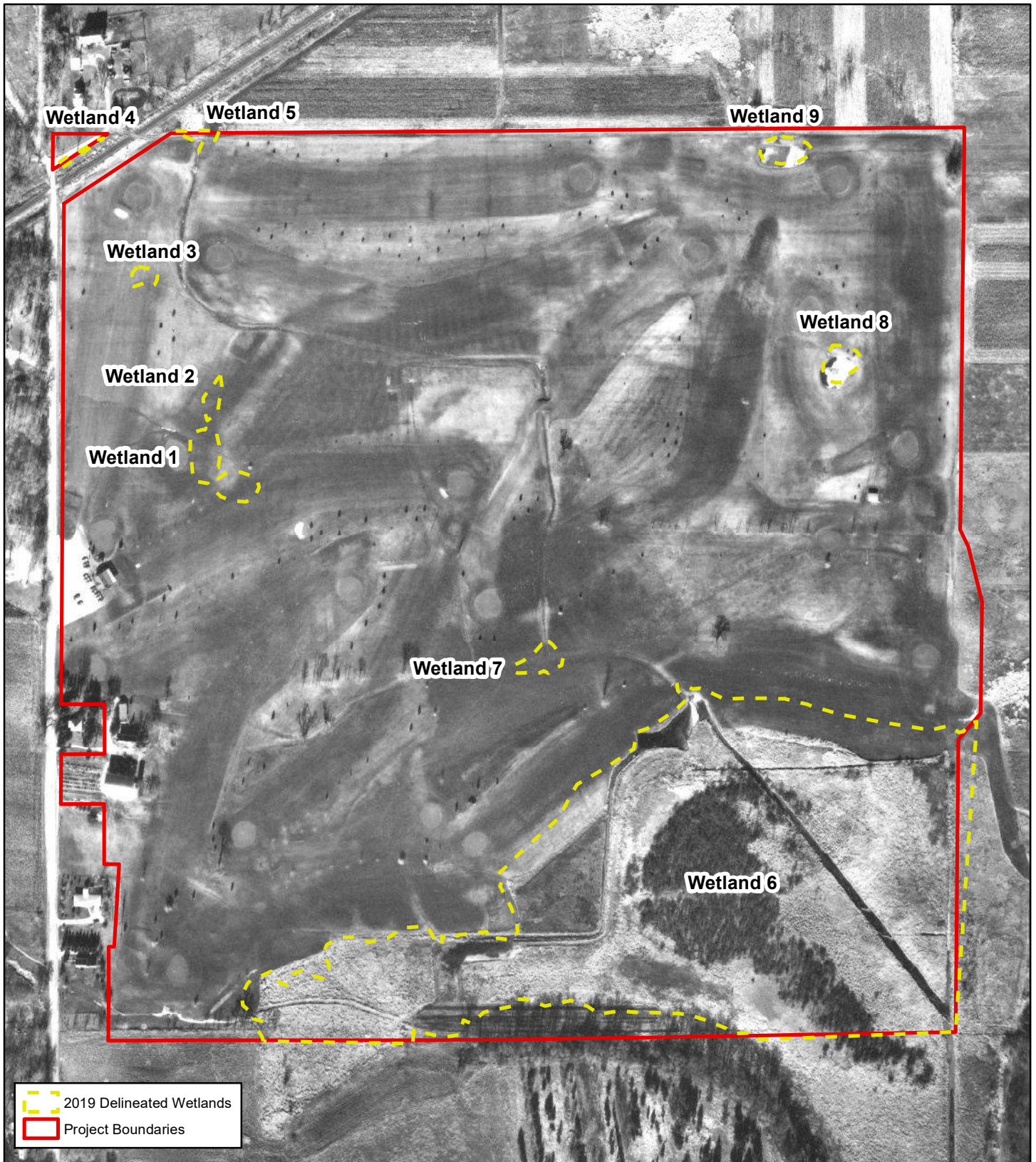
0 400
|-----| Feet

KJOLHAUG ENVIRONMENTAL SERVICES COMPANY

Source: MNGEO Spatial Commons

Hollydale Golf Course (KES 2019-113)
Plymouth, Minnesota

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



Historic Aerial Photos (1971 MNGEO Photo)



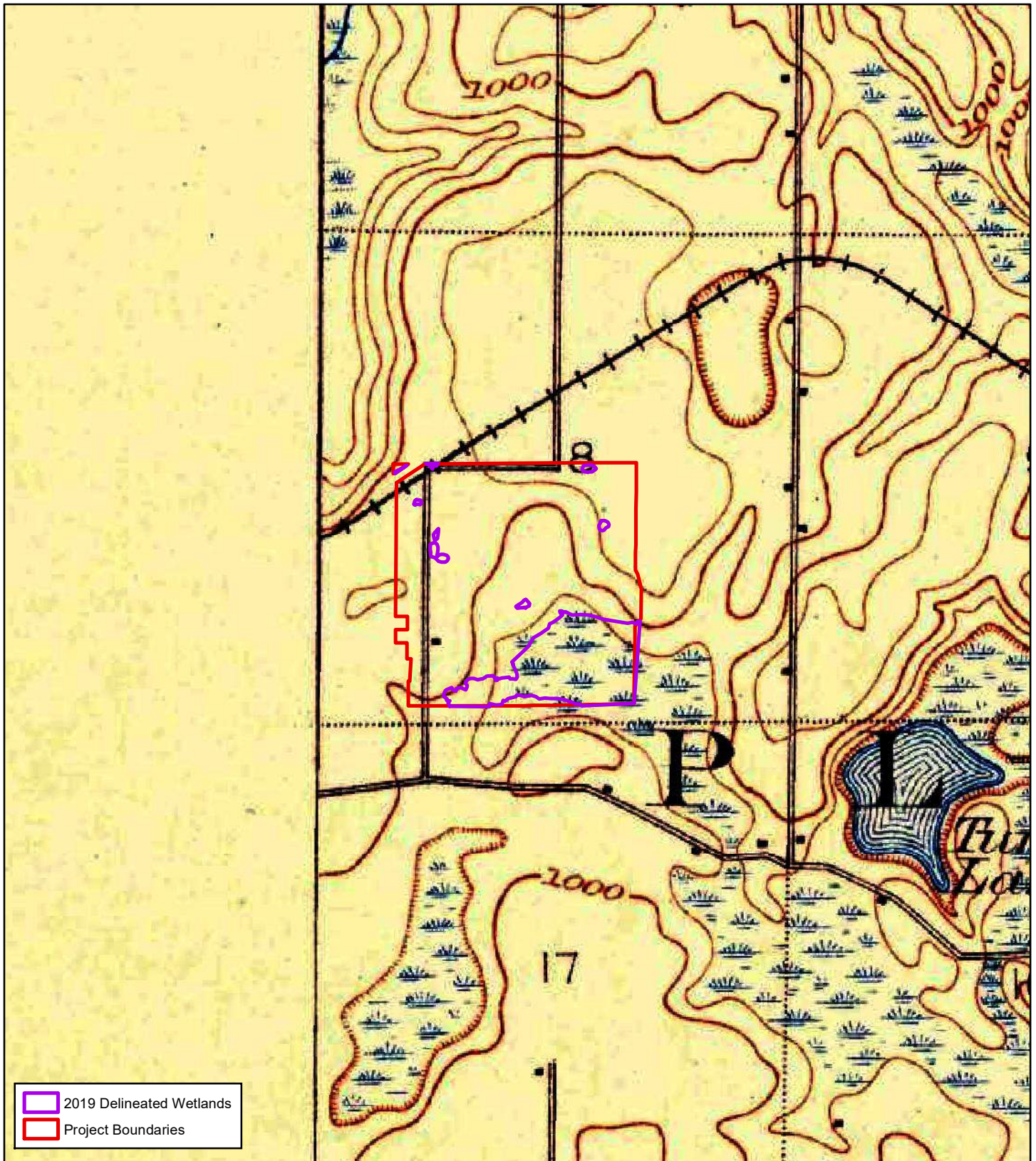
N
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0 400
|—————|
Feet

KJOLHAUG ENVIRONMENTAL SERVICES COMPANY
Source: MNGEO Spatial Commons

Hollydale Golf Course (KES 2019-113)
Plymouth, Minnesota

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USGS Historic Topography Map - 1902



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Source: MNGEO Spatial Commons

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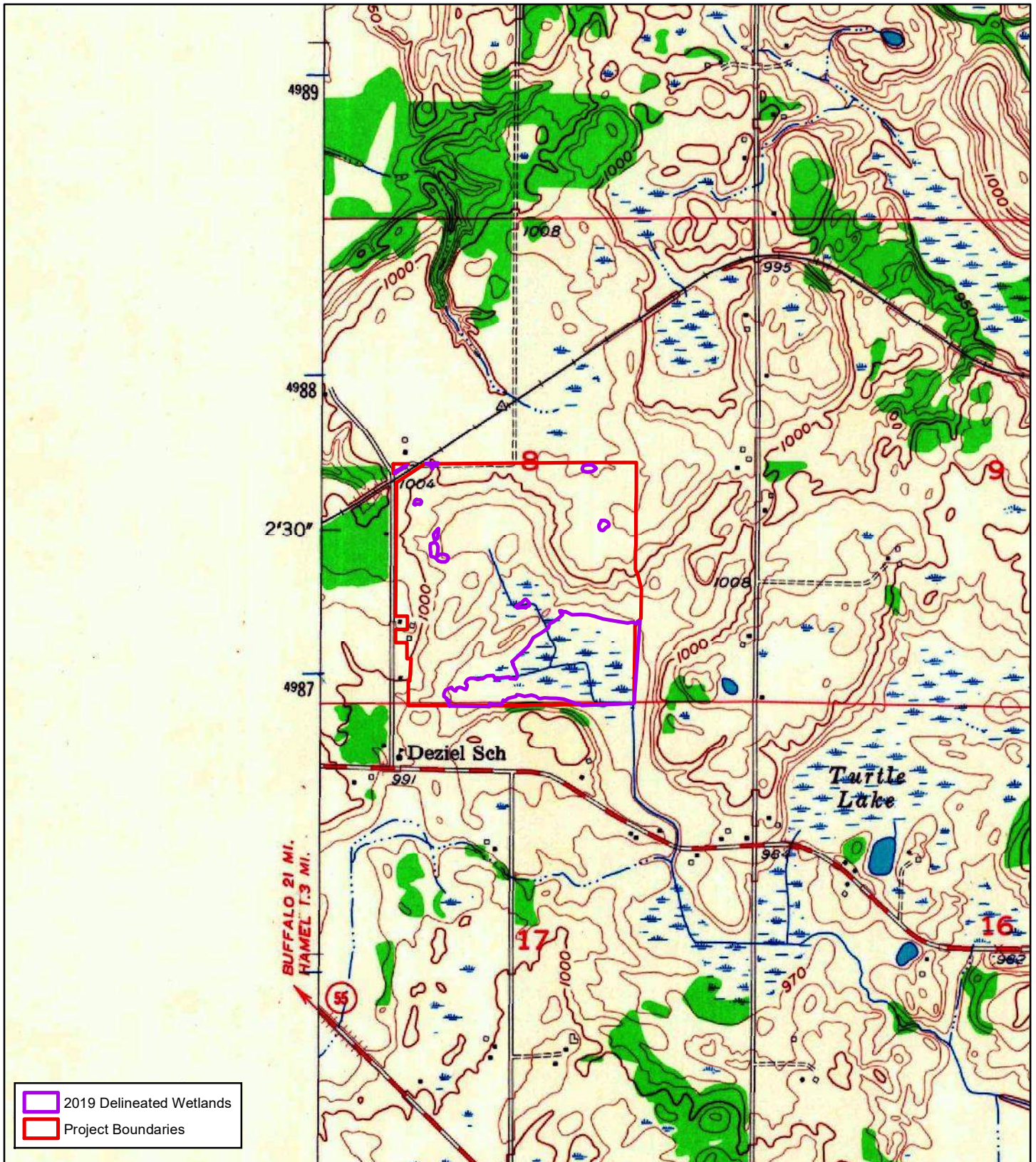
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Feet

Hollydale Golf Course (KES 2019-113)
Plymouth, Minnesota

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USGS Historic Topography Map - 1955



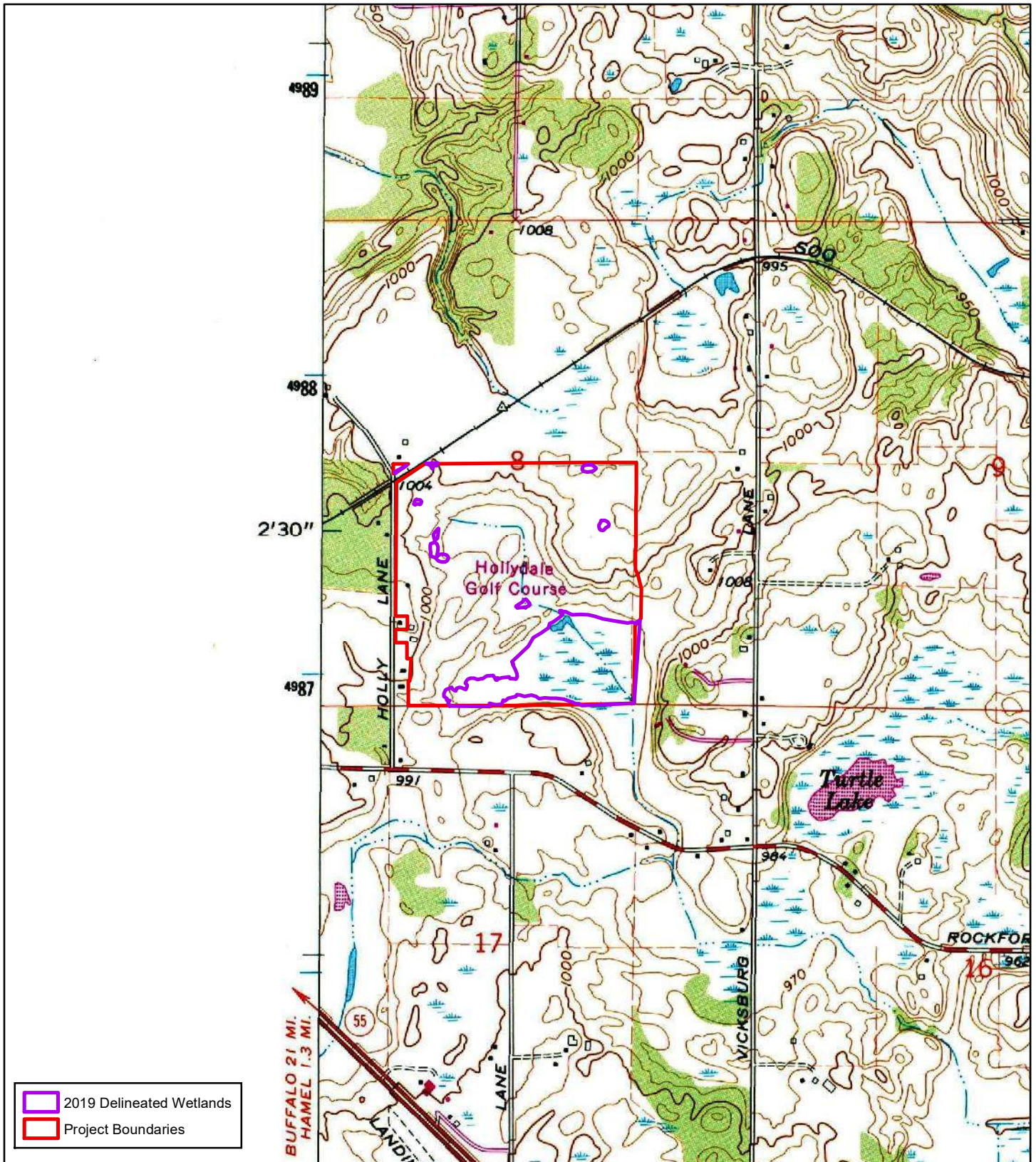
N
▲

0 1,500
┌──────────┴──────────┐
Feet

KJOLHAUG ENVIRONMENTAL SERVICES COMPANY
Source: MNGEO Spatial Commons

Hollydale Golf Course (KES 2019-113)
Plymouth, Minnesota

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



USGS Historic Topography Map - 1967

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Source: MNGEO Spatial Commons

**Hollydale Golf Course (KES 2019-113)
Plymouth, Minnesota**

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