

Memorandum

To: Bassett Creek Watershed Management Commission (BCWMC)
From: Barr Engineering Co. (Jim Herbert, PE; Gabby Campagnola)
Subject: Item 5A: Graffiti Mill East Building-Phase 1A – Minneapolis MN
BCWMC July 16, 2026 Meeting Agenda
Date: July 1, 2026
Project: 23270051.72 1020 2614

5A Graffiti Mill East Building – Phase 1A – Minneapolis, MN BCWMC 2026 – 14

Summary:

Proposed Work: East Building expansion/renovation and utility improvements

Project Proposer: Graffiti Mills, LLC

Project Schedule: Construction planned for late summer/fall 2026

Basis for Review at Commission Meeting: Work in the floodplain and variance

Impervious Surface Area: No change in impervious surfaces

Recommendations for Commission Action: Conditional Approval

General Project Information

Fruen Mill (now called Graffiti Mill) is a former industrial site located at 303 Thomas Ave North, within the Bassett Creek Main Stem subwatershed in Minneapolis (see attached map for location). The proposed commercial project includes building renovations, building expansion, utility improvements, parking modifications, and minor surfacing improvements, resulting in 0.24 acres of land disturbance. The proposed project creates 0.18 acres of fully reconstructed impervious surfaces. Some of the concrete in those areas outside the West and East Mill building footprint is planned to be removed and replaced with gravel surface.

Fruen Mill is comprised of two existing structures, the East and West Mill buildings. The lowest floor (basement) of each building is below the BCWMC 100-year floodplain elevation—9.42 feet below at the East Mill building and 8.35 feet below at the West Mill building. Under typical flow conditions, the low floor of both mill buildings is up to 5 feet below the creek elevation. Table 2 was provided by the applicant's consultant and summarizes the relevant elevations to the project such as the low floor (basement) and low opening, groundwater level, creek level, and the BCWMC 100-year floodplain.

Table 2. Lowest floor and lowest opening elevations for buildings and water elevation information.

Structure	Low Floor Elevation (ft)	Observed Groundwater Elev. Range (ft)*	Approx. Creek Elev. (ft)**	Critical Low Opening Elev. (ft)***	100-yr Floodplain Elev. (ft) (North to South)	100-yr Floodplain Elev. +2' (ft) (North to South)
East Mill	811.69	815.51 - 811.58	816.7	822.95	821.11 - 819.80	823.11 - 820.20
West Mill	812.84	815.51 - 811.58	816.7	824.01	821.19 - 820.10	823.19 - 822.10

*Observed elevations from on-site monitoring wells before dewatering and during building dewatering (summer, 2024).

**Surveyed creek elevation on 7/17/2025 at the staff gauge; note that just under 1" of rain was observed at nearby rain gauges on 6/16/2025, so creek level was likely higher than average.

***Since the floodplain slopes across the site (decreasing elevation from north to south), values for the 100-yr BCWMC floodplain elevation needed to be used at the opening locations. The 100-yr floodplain elevations at the critical low opening locations are 820.53 ft for the East Mill and 821.09 ft for the West Mill.

Table 3 was provided by the applicant's consultant and demonstrates the freeboard between the first floor and the BCWMC 100-year floodplain.

Table 3. First/Entrance floor elevations for buildings and water elevation information.

Structure	First Floor/Entrance Elevation (ft)*	100-yr Floodplain Elev. (ft)**	100-yr Floodplain Elev. +2' (ft)	Clearance Above/Below Freeboard (ft)
East Mill	822.95	821.11	823.11	-0.16
West Mill	824.01	821.19	823.19	0.82

*First floor above the basement level

**Highest BCWMC 100-yr floodplain level in contact with the structure; lower elevations to the south.

Variance Compliance

At its August 21, 2025 meeting, the BCWMC conditionally approved the requested variance to the following BCWMC floodplain requirements, as defined in the following statement: *The request was to redevelop the existing basement floors of both buildings for non-residential uses at their current elevations, up to 11.42 feet below the BCWMC freeboard requirements (100-year floodplain + 2.0 ft.), as shown in Tables 2 and 3, by using a dewatering system.*

In addition, the BCWMC conditionally approved a request for a deviation from the BCWMC flood level standards on the east building main floor to remain at its current elevation, with slightly less freeboard than the BCWMC standards, as shown in Tables 2 and 3. More specifically, this conditional approval relates only to the following three BCWMC standards:

- Section 4.0.1: Minimum building elevations (lowest floor) of new and redeveloped structures, including parking garages/ramps, must be at least 2.0 feet above the 100-year flood level. (Policy 29 in prior Watershed Management Plan)
- Section 4.0.3: The BCWMC will allow only those land uses in the BCWMC-established floodplain that will not be damaged by floodwater and will not increase flooding. (Policy 34 in prior Watershed Management Plan)
- Section 4.0.4: Allowable types of land use that are consistent with the floodplain include recreation areas, playgrounds, surface parking lots, temporary excavation and storage areas, public utility lines, agriculture, and other open spaces. (Policy 34 in prior Watershed Management Plan)

Approval of the above variances (Sections 4.0.1, 4.0.3, and 4.0.4) was conditioned on six requirements shown below.

1. The applicant must satisfy all other BCWMC development standards and submit any required application, signed by the City of Minneapolis, in accordance with Sections 2.0 and 3.0 of the BCWMC Requirements for Improvements and Development Proposals (Requirements Document). All required project plans and other sufficient information must be provided to evaluate the effect that the proposed project may have on the water resources of the watershed within the guidelines presented in the Requirements Document. Specific BCWMC requirements, general submittal guidelines and application requirements are provided in the Requirements Document. This document and the application form may be downloaded from the BCWMC's website at: <https://bassettcreekwmo.org/developer/standards-requirements>.

Commission Engineer response: See recommendation comments.

2. This approval does not allow a variance to Section 4.0.8 (Policy 38 in prior Watershed Management Plan), and so in addition to all other requirements, the project must meet the following criteria as contained in the Requirements Document:
 - Projects within the floodplain must maintain no net loss in floodplain storage
 - Projects within the floodplain must maintain no increase in flood level at any point along the trunk system (managed to at least a precision of 0.00 feet).

The Bassett Creek XPSWWM model was previously provided to the applicant's consultant to demonstrate compliance.

Commission Engineer response: Although the project results in 0.24 acres of land disturbance, the Owner has indicated that no grade changes are planned as part of the utility installation. The existing concrete in these areas will be removed and replaced with gravel.

3. The proposed floodproofing and dewatering system plan for the East and West Mill buildings must be designed by a professional engineer certified in the state of Minnesota. The buildings must be fully flood-proofed in accordance with all applicable codes and regulations (Policy 38 in prior Watershed Management Plan) to the satisfaction of the Commission Engineer. Floodproofing plan and dewatering system must include redundancy for power failures (backup power system, generator, etc.) or pump outages and consider crack sealing, floodproofing membranes, drain tile, pumps, sumps and pipes. An Operations & Maintenance plan for the floodproofing plan and dewatering system must also be filed with the city.

Commission Engineer response: See recommendation comments.

4. The approval herein is conditioned on adherence to the representation made by the applicant in its variance application that the basement levels of the East and West Mill buildings will be used only for commercial purposes and not residential/living or lodging space.

Commission Engineer response: See recommendation comments.

5. As part of its application, the applicant submitted Table 2 and Table 3 as documentation of the low floor and critical low opening elevations for the West and East Mill building. The final development plans, review application, and supporting documentation must not provide a lower level of surface water flood protection than those shown in such submittals, i.e., must not reduce the current freeboard.

Commission Engineer response: Although a portion of the East Building floor will be removed and lowered, the work does not involve lowering the floor below the elevation of 811.69 feet that was approved in conditional variance.

6. In furtherance of the BCWMC's goals related to water quality of Bassett Creek, the applicant shall redevelop the site in a manner that is consistent with all representations related to water quality made by the applicant as part of its variance application, and the applicant shall further adhere to any DNR-imposed conditions related to water quality. Additionally, all DNR General Appropriation Permit Application 2025-1746 comments must be addressed to the satisfaction of the Commission Engineer.

Commission Engineer response: See recommendation comments.

Floodplain

The BCWMC 1% annual-chance (100-year) floodplain elevation of Bassett Creek at the project site ranges from 821.8 to 816.45 feet NAVD88. The Requirements Document states that projects within the floodplain must maintain no net loss in floodplain storage and no increase in flood level at any point along the trunk system (managed to at least a precision of 0.00 feet). The proposed East Building project does not result in grade changes or floodplain fill, therefore, BCWMC floodplain review is not required.

Wetlands

The City of Minneapolis is the local government unit (LGU) responsible for administering the Wetland Conservation Act; therefore, BCWMC wetland review is not required.

Rate Control

The proposed project does not create one or more acres of new and/or fully reconstructed impervious surfaces; therefore, BCWMC rate control review is not required.

Water Quality

The proposed project does not create one or more acres of new and/or fully reconstructed impervious surfaces; therefore, BCWMC stormwater quality review is not required. [See recommendation comments regarding stream water quality issues.](#)

Erosion and Sediment Control

The proposed project results in 10,000 square feet or more acres of land disturbance; therefore, the proposed project must meet the BCWMC erosion and sediment control requirements. Proposed temporary erosion and sediment control features include sediment control logs.

Recommendation for Commission Action

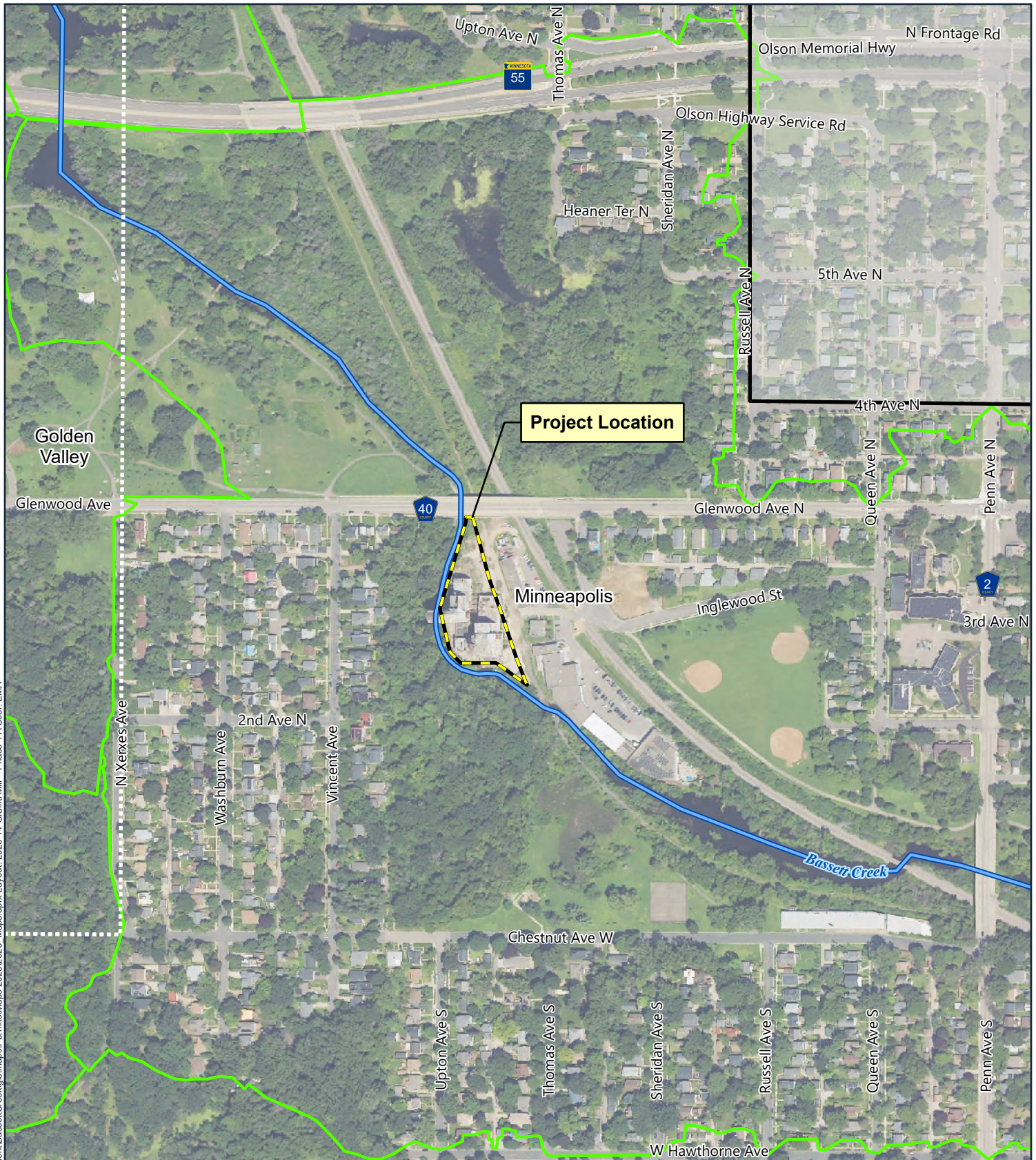
Conditional approval based on the following comments:

1. Variance Condition 3: The application included the technical memorandum dated June 15, 2026, regarding basement dewatering. The memorandum describes the general basement dewatering plan and some of the details are provided on the plans. We recommend revising the memorandum addressing each item identified in paragraph 3 and certifying the proposed floodproofing and dewatering system plan:
 - a. Floodproofing plan and dewatering system must include redundancy for power failures (backup power system, generator, etc.) or pump outages

- b. Floodproofing plan must consider crack sealing, floodproofing membranes, drain tile, pumps, sumps and pipes.
 - c. An Operations & Maintenance plan for the floodproofing plan and dewatering system must be filed with the city.
 - d. The proposed floodproofing and dewatering system plan for the East and West Mill buildings must be designed by a professional engineer certified in the state of Minnesota.
 - e. The variance application provided to the BCWMC (7/25/2025) and the Permit to Discharge Water to Bassett Creek (10/27/2025) provided to the city indicate the sump pumps would be capable of pumping continuously to Bassett Creek at a rate between 30 and 60 gpm. Yet, the drawings (Sheet P100) and the Long-Term Groundwater Discharge Permit – Additional information regarding TP (5/19/2026) is based on a groundwater pumping discharge at a constant 20 gpm. The change in pumping rate must be clarified.
 - f. The final drain tile layout plans and sump pump connection details, signed by a professional engineer in the State of MN must be provided for review.
2. Variance Condition 4: Applicant must provide a statement confirming the basement levels of the East and West Mill buildings will be used only for commercial purposes and not residential/living or lodging space.
3. Variance Condition 6: Applicant should provide status of review of DNR General Appropriation Permit Application 2025-1746.
4. Sheet C4-2, P100, Draft East Building Drain Tile Plan: the sump locations are not consistent between these plans. Revise as needed.
5. Sheet C4-1, C4-2: Drawings must clarify sump outlet and outfall protection. Under current conditions the sumps appear to discharge to a concrete apron, and the proposed civil drawings show “rock outlet protection.”
 - a. In the proposed condition does the concrete apron remain?
 - b. If feasible, the outlet pipe should be extended to discharge near the creek invert to minimize potential erosion.
 - c. Detail 10/C8-1 does not appear to represent the sump discharge alignment.
 - d. The sump discharge should be directed in a downstream direction along the creek, as feasible.
6. The applicant should evaluate whether construction entrances are required for the proposed project. If required, the plans must identify their locations and include installation details.
7. The following water quality comments must be addressed:
 - a. The Main Stem of Bassett Creek is listed as impaired for fish and benthic macroinvertebrate bioassessments, as well as chloride. The MPCA has identified eutrophication and elevated chloride concentrations as a primary cause of these impairments and stressors to aquatic life in this reach. Any discharge to Bassett Creek should meet or be cleaner than the state's Class 2b standards for the creek.
 - b. The Permit to discharge water to Bassett Creek (10/27/2025) indicates “The dewatering system discharge will meet all applicable water quality standards and will have chloride and total suspended solids concentrations below those typically found now in Bassett

Creek.” Tables 1 and 2 in the referenced 10/27/2025 document (submitted to City of Minneapolis) shows the following analytes do not meet applicable standards.

- i. Zinc, total (as Zn) = 0.0751mg/L > 0.067mg/L (Class 2b Standard) on 9/8/2025
 - ii. Phosphorus, total (TP) = 0.395 mg/L > 0.1 mg/L (Class 2b Standard) on 9/8/2025
 - iii. Phosphorus, total (TP) = 0.166 mg/L > 0.1 mg/L (Class 2b Standard) on 8/20/2025
8. The proposed work appears to include reconstruction of impervious surfaces outside of the parcel boundary. According to the Requirements Document, if a property has several redevelopment projects over time that individually do not trigger the BCWMC performance goal (based on new/fully reconstructed impervious surfaces), but would when combined, the applicant will be required to provide treatment in accordance with the BCWMC performance goal for all redevelopments. The BCWMC performance goal will apply to any surfaces as part of the redevelopment (even if the surface is outside the parcel boundary).



Project Location

Minneapolis



Project Location



Municipality



BCWMC Legal Boundary



BCWMC Hydrologic Boundary



Major Subwatershed



0 200 400
Feet



**BCWMC 2026-14
Graffiti Mill – Phase 1 A
Minneapolis, MN**

LOCATION MAP

BARR