



US Army Corps
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PUBLIC NOTICE

Applicant:
Scott Martin
Land Learning Foundation

Published: January 12, 2026
Expires: February 11, 2026

St. Louis District
Permit Application No. MVS-2024-697

WETLAND COMPENSATORY MITIGATION SITE PROPOSAL **Public Notice: St. Louis District**

Interested parties are hereby notified that the Land Learning Foundation (LLF)(Sponsor) has requested under their In-Lieu-Fee (ILF) Program Instrument and corresponding amendment; approval for an ILF mitigation project pursuant to 33 CFR 332 and 40 CFR 230 Compensatory Mitigation for Losses of Aquatic Resource; Final Rule (Federal Register / Vol. 73, No. 70 Pages 19594-19705, April 10, 2008). The St. Louis District has the Apple/Joachim Ecological Drainage Unit Service Area for this bank site proposal and therefore will be requesting comments from this area of responsibility. This service area will provide mitigation options for applicants in the District.

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PROJECT LOCATION: The project site (Twin Hollow) includes approximately 64+/- of agricultural land situated in the Mississippi River bottoms of southern St. Louis County, Missouri. It is located adjacent to the community of Oakville, just south of the City of St. Louis. The site is within Section 25, Township 43 North, Range 6 East. Coordinates for the center of the site are Latitude: 38.43784 Longitude: -90.29719. (See attached location maps).

AUTHORITY: Section 10 of the Rivers and Harbors Act of 1899 (33 USC 403), Section 404 of the Clean Water Act (33 USC 1344) and in compliance with requirements outlined in the April 10, 2008, Final Compensatory Mitigation Rule.

SECTION 408: Section 408 authorization is not required because there are no federal projects in or near the vicinity of the proposal.

PROJECT DESCRIPTION: LLF is seeking approval to establish the Twin Hollow Site, a 64.55-acre wetland mitigation project. This project is proposed under the approved LLF In-Lieu-Fee (ILF) Program. The Sponsor is formally requesting approval from the U.S. Army Corps of Engineers (St. Louis District) and the Interagency Review Team (IRT), which includes representatives from the U.S. Environmental Protection Agency,

Missouri Department of Natural Resources, Missouri Department of Conservation and the U.S. Fish and Wildlife Service

Once approved, the project will provide certified wetland mitigation credits for permittees who need to offset unavoidable impacts to aquatic resources within the Apple/Joachim Ecological Drainage Unit (EDU).

Restoration Goals and Expected Outcomes

The primary goal is to transform a 64.55-acre agricultural field into a thriving wetland ecosystem. The restored site will consist of:

- Emergent Wetland: 43.46 acres designed to hold water and support native wetland vegetation.
- Upland Buffer: 21.09 acres of surrounding habitat, including restored native plants and existing forest, to protect the wetland and provide diverse habitat for wildlife.

Based on the Missouri Wetland Mitigation Method (MWMM), this restoration plan is projected to generate 221.42 wetland credits.

Hydrology and Construction Plan

The site's soils have been identified as hydric, making them ideal for wetland restoration. The construction plan focuses on re-establishing natural water flow and retention across the landscape. Key methods include:

- Berm Construction: LLF will construct low-profile earthen berms (at an elevation of 401 feet) to capture and hold water that currently drains from the field. Berms will feature gentle 10:1 slopes to allow for natural overflow during high-water periods, preventing erosion. A separate berm will also be placed to block a drainage culvert in the southeast corner.
- Creative Excavation: The site has three low-elevation areas that already hold water periodically. LLF will strategically excavate approximately 8 acres of the surrounding field by 6-12 inches. This will connect and expand these natural pools, creating a single, cohesive 43-acre wetland area designed to maintain a water depth of 6 to 24 inches.
- Soil Management: The excavated soil will be repurposed to build the earthen berms, ensuring an efficient and balanced on-site construction process.

Buffer Zone and Habitat Enhancement

The 21-acre buffer zone is a critical component of the project. While not designed to be permanently inundated, these saturated areas will:

- Support a wider variety of plant and animal species.
- Act as a natural filter, trapping nutrients from adjacent agricultural land.
- Incorporate the newly constructed berms and 3.6 acres of existing forest to enhance habitat diversity.

Verification and Reporting

LLF is committed to ensuring the project's success. They will verify all elevations during construction to confirm the hydrological design functions as intended. Upon completion, LLF will submit a formal as-built report to the IRT, detailing the final construction and confirming the wetland and buffer credits generated.

A copy of the complete Site Mitigation Plan is available upon request from our office.

SERVICE AREA: The proposed primary bank site service area will be the Apple/Joachim Drainage Unit - Service Area, which includes the St. Louis District.

BANK SITE NEED/TECHNICAL FEASIBILITY/ECOLOGICAL SUITABILITY: The Twin Hollow Mitigation Site is an ideal candidate for successful wetland restoration, chosen for its compelling ecological need, high technical feasibility, and exceptional environmental suitability.

Ecological Need and Restoration Potential

Historically, the floodplains of the lower Mississippi River were a vast network of emergent wetlands, bottomland prairies, and forests. Over the last 150 years, this project site, like much of the region, was cleared, drained, and leveed for agricultural use. As a result of being actively row-cropped since at least the 1940s, the site currently lacks the diverse, native plant community characteristic of its pre-settlement condition.

This project directly addresses that historical loss. By reintroducing native emergent wetland plants (including obligate, facultative wet, and facultative species), LLF will restore critical habitat and provide vital foraging opportunities for a wide array of wildlife, including birds, invertebrates, and small mammals.

Technical Feasibility and Site Suitability

The site's physical and chemical properties are exceptionally well-suited for wetland restoration:

Strategic Location: The property is strategically located within a larger ecological context. It is bordered by a forested riparian corridor along the Mississippi River to the east, and a forested wetland to the west. It also abuts Cliff Cave County Park, connecting it to a network of protected lands and public trails. This positioning ensures the restored wetland will not be an isolated habitat but part of a larger, functioning ecosystem.

Proven Soil Quality: Decades of agricultural use have demonstrated the soil's high productivity. LLF's analysis confirms that the soil chemistry is perfectly suited for establishing native vegetation. Furthermore, soil samples show a dense physical structure with excellent water retention capabilities—a critical factor for a sustainable wetland.

Favorable Hydrology: The site's hydrology is naturally conducive to wetland conditions. It lies within the FEMA 2-year floodplain, meaning it has a 50% chance of receiving floodwater from the Mississippi River in any given year. This provides a reliable, natural source of hydrology to sustain the wetland ecosystem.

Long-Term Viability and Risk Management

LLF carefully assessed potential risks, primarily the frequency and duration of flooding from the Mississippi River and have integrated a robust management plan to ensure long-term success.

Flood Resilience: While prolonged submergence can impact some plants, the native hydrophyte species selected for this project are well-adapted to flood conditions. The health of the surrounding bottomland vegetation, which has thrived for decades despite numerous floods, serves as a natural testament to the resilience of this type of ecosystem.

Adaptive Management During Establishment: During the initial "Performance Period," LLF will proactively monitor the site. They will conduct surveys after flood events to assess the health of the newly established vegetation and will re-seed where necessary. LLF will also inspect the integrity of all newly constructed berms and perform any needed repairs.

Long-Term Stewardship Commitment: Once the restoration is complete and all performance standards are met, LLF will ensure the site will function as a self-sustaining wetland. Nevertheless, LLF commits to the project's long-term success. LLF will be required to monitor the site and will consult with the U.S. Army Corps of Engineers to implement a rapid response plan should any catastrophic event ever threaten its ecological integrity.

LOCATION MAPS AND DRAWINGS: See attached. In addition, the project plans may be viewed in color and in more detail by visiting the Public Notice section of our website at: <https://www.mvs.usace.army.mil/Missions/Regulatory/Public-Notices/> . Please select Public Notice number MVS-2024-697.

APPLICANT’S STATEMENT OF AVOIDANCE, MINIMIZATION, AND COMPENSATORY MITIGATION FOR UNAVOIDABLE IMPACTS TO AQUATIC RESOURCES:

The mitigation proposal is considered a restoration activity with no anticipated adverse impacts to aquatic resources. This mitigation banking proposal does not preclude the requirement for any Section 404 permit applicant, who intends or is required to use wetland or stream credits generated by this mitigation project, to comply with Clean Water Act Section 404(b)(1) Guidelines; the National Environmental Policy Act; and the District’s evaluation of probable impacts on public interest. Likewise, the U.S. Army Corps of Engineers is committed to determining compensatory mitigation through the implementation of current Regulatory Guidance and best professional judgment to consider on-site or within the immediate sub-watershed mitigation opportunities first, when impacts to waters of the United States cannot be practicably avoided or further minimized.

STATE SECTION 401 WATER QUALITY CERTIFICATION: If the Banking IRT approves the proposed Twin Hollow Site, the proposed wetland restoration, enhancement and preservation activities associated with the ILF site will comply with and will be authorized through the issuance Nationwide Permit 27 (Aquatic Habitat Restoration, Enhancement, and Establishment Activities). Therefore, Section 401 Water Quality Certification (WQC) is granted, subject to compliance with General Conditions and WQC Special Conditions established specifically for Nationwide Permit 27.

ENDANGERED SPECIES: A review of the U.S. Fish and Wildlife Service’s Information for Planning and Consultation website has been completed and the following species were identified to potentially be present in the project vicinity: The endangered Gray Bat (***Myotis grisescens***), Indiana Bat (***Myotis sodalis***), proposed endangered Tricolored Bat (***Perimyotis subflavus***), endangered Pallid Sturgeon (***Scaphirhynchus albus***), threatened Decurrent False Aster (***Boltonia decurrens***) and candidate species Monarch Butterfly (***Danaus plexippus***). In compliance with the Endangered Species Act, a preliminary determination has been made that the described work will have no effect on all six (6) listed species or adversely affect critical habitat. The Corps is coordinating with the U.S. Fish and Wildlife Service and the applicant is taking measures to minimize any potential effects of the project during construction. In order to further complete our evaluation, written comments are solicited by this public notice from the U.S. Fish and Wildlife Service and other interested agencies and individuals.

CULTURAL RESOURCES & TRIBAL TRUST: The District requested that the applicant provide a reconnaissance survey of the project area to investigate the permit area and inform analysis of potential affects. A Phase I Cultural Resource Survey was completed by Missouri State University (MSU) archaeologists on behalf of the Sponsor. MSU surveyed a 64-acre area and identified no significant cultural findings within the survey area. The District concurred with MSU’s report and found “No Historic Properties

Affected” for the project. The survey report was coordinated with the Tribes on December 30, 2025.

EVALUATION: The decision whether to approve the ILF Sponsor to proceed with the mitigation site project will be based on an evaluation of all comments received, and all relevant factors to the proposal, including the cumulative effects thereof. These factors include, but not limited to conservation, economics, aesthetics, general environmental concerns, wetlands, cultural values, fish and wildlife values, flood hazards, floodplain values, land use, navigation, recreation, water supply and conservation, water quality, energy needs, safety, food and fiber production, mineral needs, the general needs and welfare of the people and compliance with the Mitigation Rule.

PUBLIC HEARING REQUESTS: Any person may request, in writing, within the comment period specified in this notice, that a public hearing be held to consider the applicant’s proposal. Any request for a public hearing shall state, with particularity, the reason for the hearing, and must be based on issues that would warrant additional public review. A request may be denied in writing by the Corps if substantive reasons for holding a hearing are not provided or if there is otherwise no valid interest to be served.

SOLICITATION OF COMMENTS: The U.S. Army Corps of Engineers is soliciting comments from the public; Federal, state, and local agencies and officials; Tribes; and other interested parties in order to consider and evaluate the impacts of the proposed activity. Any comments received will be considered by the U.S. Army Corps of Engineers to determine whether to issue, modify, condition, or deny a permit for this proposal. To make this decision, comments are used to assess impacts on endangered species, historic properties, water quality, general environmental effects, and other public interest factors listed above. Comments are used in the preparation of a Memorandum for Record associated with Nationwide Permit 27. Comments are also used to determine the need for a public hearing and to determine the overall public interest of the proposed activity. Additional information may be obtained by contacting David P. Meyer, Project Manager, U.S. Army Corps of Engineers, at 314-331-8810 or by e-mail to David.P.Meyer@usace.army.mil.

To join our public notice mailing list and receive all of our Public Notices electronically, please email your request to: MVS-Regulatory@usace.army.mil and include your name, email, and phone number with your statement of request to be added to the Public Notice mailing list.

Attachments

NOTICE TO POSTMASTERS:

It is requested that this notice be conspicuously and continually placed for 30 days from the date of this issuance of this notice.

Figure 3. Mitigation Site Topographic Map

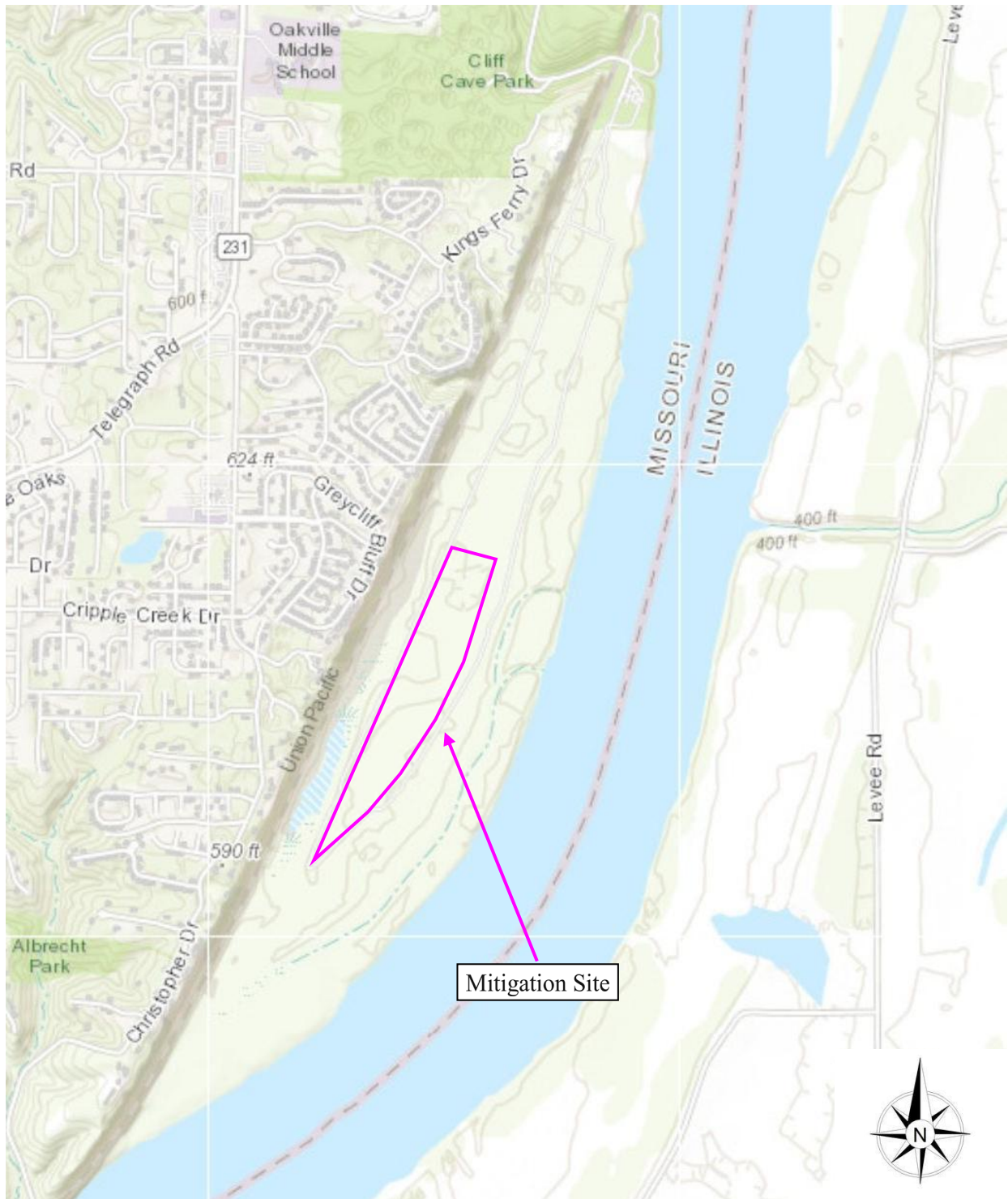


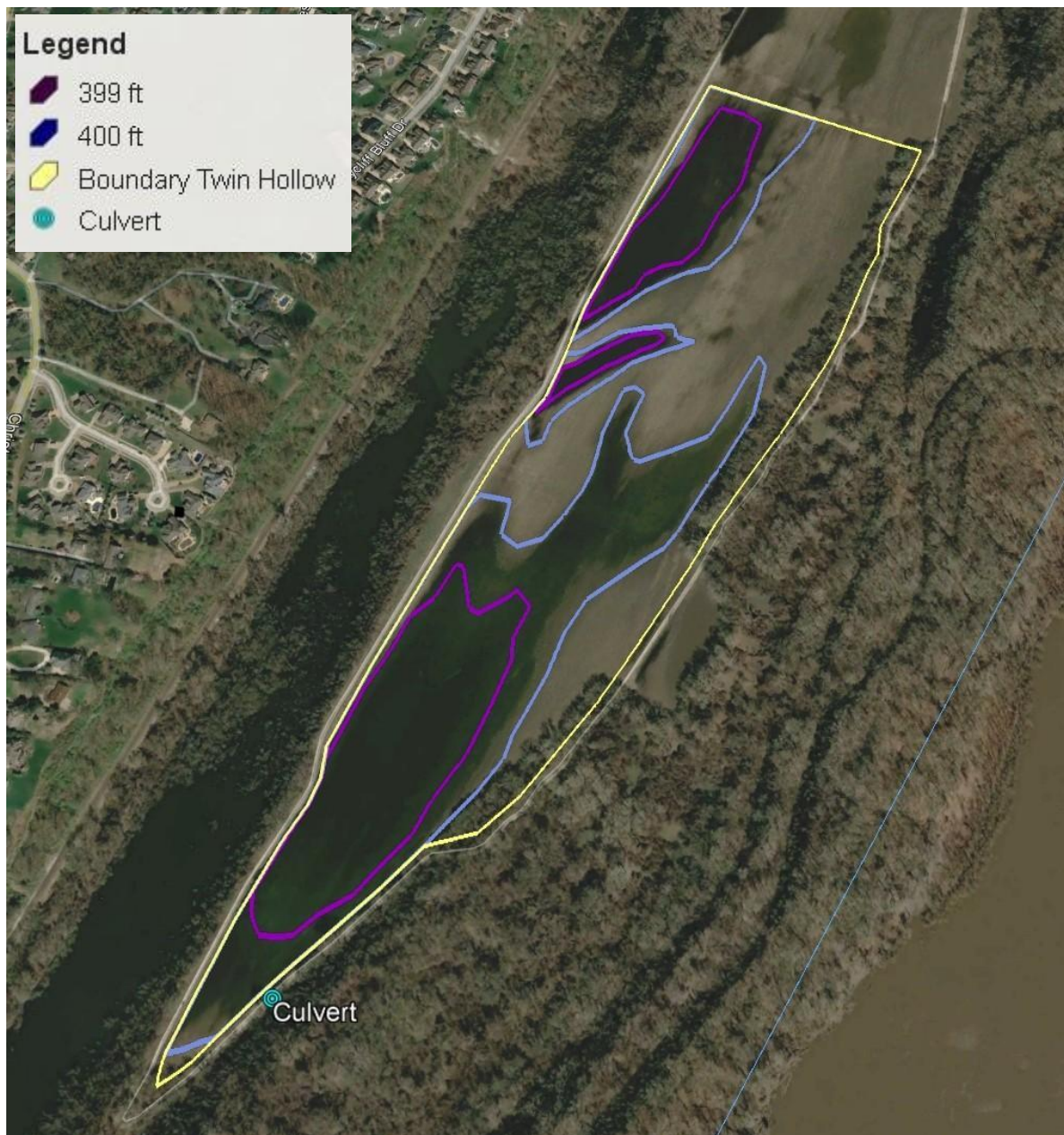
Figure 4. Mitigation Site LiDAR Map



into and out of the site and thus not threaten the low earthen berms once they are established and vegetated. LLF will monitor these areas annually as well as after major flood events and adjust, including armoring, if necessary and consistent with adaptive management principles.

3. Establish Wetland Vegetation. LLF will spray invasive and noxious species and introduce additional native wetland vegetation during the five-year performance period to accelerate the transition to a functional emergent wetland. The Mitigation Site will be seeded with native herbaceous vegetation to stabilize berms and to increase diversity within the restored wetland and the buffer.

Figure 5. Wetland Pools Current Overview (imagery date March 2020)



LLF selected berm elevations to maximize the area of restored hydrology. The extent of the proposed wetland area and berm location is detailed in Figure 6. During construction, LLF will verify the proposed elevations and ensure that the wetland berms provide the hydrology described above.

Once construction is complete, LLF will submit an as-built report detailing the area excavated and the anticipated emergent wetland and buffer credits generated under the MWMM.

Figure 6. Planned Wetland Pool Expansion and Berm Location (imagery date July 2020)

