



*Working to protect the Mississippi River
and its watershed in the Twin Cities area.*

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April 12, 2018

District Commander
St. Paul District, U.S. Army Corps of Engineers
ATTN: Regional Planning and Environment Division North
180 Fifth Street East, Suite 700
St. Paul, MN 55101

RE: Environmental assessment of the ACOE Pigs Eye Lake habitat restoration project.

District Commander:

Friends of the Mississippi River (FMR) is a local non-profit community-based organization that works to protect and enhance the natural and cultural assets of the Mississippi River and its watershed in the Twin Cities. We have 2,400 active members, more than 3,000 volunteers and 1,600 advocates who care deeply about the river's unique resources. FMR has long been an active and ongoing participant in environmental review processes occurring in and along the Mississippi River in the Twin Cities.

We are writing today with brief comments on the draft environmental assessment for the proposed Pigs Eye Lake restoration project.

FMR is generally in support of the draft environmental assessment and proposed creation of seven islands in Pig's Eye Lake. The stated project objectives are in line with FMR's mission to protect, restore, and enhance habitat along the Mississippi River. However, we also believe that this project presents an important opportunity to build in experimentation around climate resilience, which is not currently presented in the plan.

Creation of new habitat in any given area must take into account historical, current, and potential future conditions of that area. Facing an uncertain climate future, one in which the state of Minnesota is expected to experience increases in temperature and subsequent range shifts of both plant and animal species, any project creating new habitat would be wise to consider the implications of these changes.

The proposed seven islands in Pig's Eye Lake present an opportunity for a living laboratory of sorts, in which different combinations of plant communities or plant ecotypes on each island could provide important insights into how shoreline and wetland communities will respond to a changing climate. This idea also builds resilience into the overall project itself, preventing a large loss of investment if a particular island or plant community were to fail due to pests, disease, climate change, or other related stressors.

FMR proposes that the Corps consider using this Pig's Eye habitat project as a study site, in partnership with organizations like FMR and the University of Minnesota, to experiment with plant community assembly questions in the face of a changing climate. By monitoring these changes in the long-term, we could gain important insights that could influence how non-profit, local, state, and federal agencies approach the field of habitat restoration.

Thank you for your consideration of these comments. I would be happy to discuss these further – please do not hesitate to contact me at 651-222-2193 x 33, or aroth@fmr.org.

Sincerely,

A handwritten signature in black ink that reads "Alex M. Roth". The signature is written in a cursive style with a large, stylized initial 'A'.

Alex Roth, PhD
FMR Ecologist