



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

101 East Fifth Street
Suite 2000
Saint Paul, MN 55101

651-222-2193
www.fmr.org
info@fmr.org

March 22, 2017

Mr. Jon Duesman, Construction Project Manager
Minneapolis Park & Recreation Board
2117 West River Road N
Minneapolis, MN 55411

Re: Environmental Assessment Worksheet for Scherer Site and Hall's Island Reconstruction

Mr. Duesman:

Friends of the Mississippi River (FMR) is a non-profit organization with a mission to engage community members and other stakeholders to protect, restore and enhance the Mississippi River and its watershed in the Twin Cities region. We represent thousands of people in the metropolitan area who care deeply about what happens around the river, including a growing membership of over 2,400 people and more than 6,000 volunteers engaged in 2016. FMR was founded in 1993 to provide a voice for the river and newly formed National Park – The Mississippi National River and Recreation Area (MNRRA).

FMR has been an active participant in planning for new parks and trails along the river in north and northeast Minneapolis since 1998. We participated in the working group that put together Minneapolis' Above the Falls Master Plan and Vision, and we have played a leadership role on the Above the Falls Community Advisory Committee (AFCAC) since its inception in 2001. Working in collaboration with AFCAC and other community organizations, we also participated as a stakeholder in the development of the RiverFirst Plan.

In addition, we have two professional ecologists on staff that develop management plans and conduct ecological restoration at more than 30 natural area sites in the Twin Cities. Their input on the planting plan is included in this letter.

We highly value our strong relationship with MPRB and the trust that has been established between our organizations. We currently have a five-year MOU with MPRB to conduct restoration at Olson Park in north Minneapolis and the Mississippi River Gorge in south Minneapolis. Additionally, FMR and MPRB enter a park stewardship agreement annually that outlines our work to engage several hundred volunteers at river restoration sites on MPRB land. In that spirit of cooperation and shared goals, we offer the following comments on the EAW.

In general, we are very satisfied with the information provided in the EAW document. We commend MPRB for doing their due diligence to examine potential impacts to the Mississippi River environment and we do not think an EIS is warranted.

6. Project Description

The document (page 6) states, "Once island construction is complete, upland portions would be vegetated with native, habitat-supportive herbaceous seed mixes, shrubs, and trees, and temporary erosion control measures installed; vegetation maintenance would be required for up to five years or until performance standards established by permitting are met."

However, the Planting Plan in Appendix A, L-04 shows sycamore (*Platanus occidentalis* L) plantings, which are not native to Minnesota. Given the fact that sycamore trees are native in Iowa and Wisconsin and their inclusion may be in pursuit of an assisted migration strategy for this species (in response to climate change), we can support this species being planted. We would like to recommend, however, that 50 percent of the sycamore plantings be replaced with Eastern cottonwood (*Populus deltoides*), because of their importance to the riverine ecosystem and because natural cottonwood regeneration along the river has stagnated. Following the existing plan, which states, "allowing cottonwoods to naturally regenerate on lowest areas," without planting new ones, may result in a lack of cottonwoods on the island due to poor natural regeneration.

The plans for a restored Hall's Island show riprap will be used. If possible, a more natural approach is desired, as riprap provides little habitat value and is unattractive. If riprap is used, adding vegetation would increase its habitat value. We recommend adding live stakes between the rocks, or creating lines of vegetation by adding plugs of shrubs, sedges, rushes etc. within the riprap matrix.

Pages 6-8 lay out MPRB's proposed strategy for construction sequencing. The approach of dredging out the middle, then the downstream end and then the finally the upstream end makes sense. This will minimize sediment being released into the water, however there could be some pitfalls. This approach requires that low water conditions persist long enough to complete the in-stream work. With rain and flooding becoming more frequent, we would like to see a contingency or emergency response plan created in the event of unexpected high flows during the winter months.

We strongly support the project purposes of ecological benefits, community connections and recreation.

7. Cover Types

Table 2 on page 10 shows that there will be an increase in lawn/landscaping cover from 0.3 to 3.5 acres. We would like to see the use of no-mow short or native short-grass prairie instead of turf. A suggested alternative for the turf area could be short grass prairie with abundance of forbs for pollinators, or even some small pollinator gardens or patches interspersed with turf.

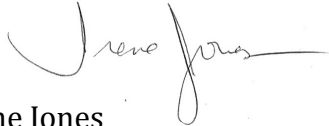
We appreciate the changes to land cover that will take place as a result of this project, such as reducing the amount of vacant lot/sparse vegetation, limiting the increase in impervious surface and the addition of new wetlands, grasslands and woodlands.

We agree with the assessment in sections 9 through 20 that the impacts from this project will be largely positive, and that negative impacts to water resources, fish, wildlife, sensitive ecological features, historic properties, air quality and neighborhood livability will largely be temporary and of little to no long-term consequence.

With the addition of this island and several acres of restored habitat, most of the environmental impacts from this project will be positive in nature. Healthy native plant communities are needed in northeast Minneapolis, and where feasible, these opportunities are essential to improving the quality of life for wildlife and nearby residents as well as other park visitors.

Thank you for your consideration of these comments. Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Irene Jones". The signature is written in black ink and is positioned above the printed name and title.

Irene Jones
River Corridor Program Director

Cc:
President Anita Tabb
Commissioner Liz Wielinski
Assistant Superintendent Michael Schroeder