



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

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June 22, 2021

Re: County-owned redevelopment sites

Dear Commissioners:

We are writing to share our comments on the county's ongoing planning process for its properties in Maplewood near the Mississippi River Corridor Critical Area (MRCCA), particularly the 77-acre grasslands property adjacent to the county corrections facility.

Friends of the Mississippi River 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 the river, including a growing membership of over 2,700 people, more than 3,200 volunteers, and 2,000 advocates engaged each year.

FMR is grateful for the county's leadership in quickly securing a contractor to conduct an ecological resources inventory of the grasslands site and the Ponds at Battle Creek. We urge the county to wait for the full inventory findings before making any decisions about future development on the site. (We have shared some more detailed comments with county staff about how to make the survey as informative and thorough as possible.)

In the meantime, we'd like to offer some information about why the grasslands property, in particular, is so ecologically critical and how its benefits can be maximized.

We believe that the ideal outcome for the 77-acre grasslands property would be to preserve all of it as open space, adding it to Battle Creek Regional Park as a protected open space. This property's ecological value is exceptionally high given the statewide rarity of grassland habitat and the presence of rare animal species on the site. The protection benefit is increased by the property's adjacency to additional wildlife habitat; large habitat areas and wildlife corridors are significantly more beneficial than small, fragmented parcels for sustaining wildlife populations.

### **Environmental crisis requires habitat protection**

We understand the housing crisis our community is facing and commend the county for taking an active role in creating more affordable housing, including at properties it owns. FMR

supports the creation of deeply affordable housing and we actively advocate for its inclusion in new development. We believe that all community members deserve to live in affordable and healthy neighborhoods, enjoying equitable access to parks, the Mississippi River, and other assets.

However, we are also facing an environmental crisis. One of our community's responses must protect wildlife populations and natural areas in all parts of the Twin Cities. We can't make the mistake of responding to our housing crisis by worsening our environmental crisis. That's why we urge the county to carefully consider the future of this unique grassland property and rely on science to guide the decision-making process.

### **Habitat fragmentation limits ecological benefit**

We are concerned that some of the recent Perkins+Will development concepts for the grasslands significantly fragment the undeveloped spaces. Should the county decide to develop a portion of the site, development must be clustered to provide the largest contiguous habitat areas possible. *A poorly laid-out development plan might provide very little ecological benefit even if some open space is preserved.*

Many imperiled species are very sensitive to habitat fragmentation, which is one of the reasons behind their staggering population declines. Grassland birds, many of whom have been documented by experienced birders at the county property, are among the most threatened species in the United States. Fewer than two percent of Minnesota's grasslands remain from what existed before European settlement.

Among the birds documented at the county property, several are identified as Species of Greatest Conservation Need and are also known to be sensitive to "patch size." They are less likely to nest in small grassland areas. Birds documented on the county property who are both Species of Greatest Conservation Need and sensitive to patch size include:

- Grasshopper sparrow (Minnesota population has declined 97% since 1966)
- Henslow's sparrow (an endangered species in Minnesota, population has declined 67% since 1966)
- Eastern meadowlark (Minnesota population has declined 68% since 1966)
- Bobolink (Minnesota population has declined 58% since 1966)

To give you an idea of these species' habitat needs, the endangered Henslow's sparrow has been found to need 80+ acres of contiguous habitat for nesting success. Bobolinks need about 40-70 acres.

Birds are often a "canary in the coal mine" when species of all types face catastrophic challenges such as habitat loss and climate change. Their well-documented population declines raise concerns about the health of other species, too. And birds are not the only

species that rely on large, contiguous habitat areas. Some smaller animal species, including some pollinators, won't even cross a paved path. The same is true for some plants.

### **Development size and location matter**

Moreover, not all habitat patches of a given size are created equal. Their position on the landscape is important, too. For example, for the bird species listed earlier, nests near a woodland boundary suffer more predation and nest parasitism. Given that the western edge of the property is adjacent to a wooded area, a preserved grassland area on that side—even if it met the minimum size requirements for sustaining a population of grassland birds—may inadvertently harm these species' chances of survival.

The forthcoming ecological inventory should help guide which areas of the property provide the most valuable habitat and should be prioritized for protection. The best design will take into account not only the site's ecological resources but also the surrounding context. Both the park and the correctional facility have adjacent open space that could help maximize contiguous habitat areas. It's one of the reasons why this parcel is so ecologically valuable.

We also urge you to not lose sight of the fact that the other county-owned properties in the area (Boys Totem Town and the Ponds) are very much linked in the eyes of migratory birds, insects, and other wildlife. All three properties should be considered as a whole before any development plans move forward. It is our sense that the Ponds and Totem Town may be better candidates for partial redevelopment in the areas that are already developed; however, the golf course's habitat areas and the largely intact oak savanna on the Totem Town site should be managed for their natural resource values. Again, ecological inventories can provide more detailed guidance for the county.

We look forward to continuing this conversation with county and city leaders as the planning process continues. Thank you for your thoughtful approach to equity, environmental protection, and development.

Sincerely,

A handwritten signature in black ink that reads "Colleen O'Connor Toberman". The signature is written in a cursive, flowing style.

Colleen O'Connor Toberman  
River Corridor Director