



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

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Dear planning commissioners:

Thank you for the opportunity to comment on Champlin's proposed Mississippi River Corridor Critical Area (MRCCA) ordinance.

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

The Mississippi River is a natural, cultural and historic wonder that helps define our metro area. In recognition of this, its 72-mile stretch through the Twin Cities is not only a state-designated Critical Area but also a national park afforded special protective policies.

The MRCCA ordinance adoption process is an important opportunity for communities to define their goals and expectations for years to come. A successful ordinance will guide riverfront use in a way that reflects the city's environmental, development, and recreational priorities while providing clarity for landowners and developers.

### **Ordinance is thoughtful and incorporates resident feedback**

On the whole, we're pleased with Champlin's draft MRCCA ordinance and the community engagement conducted during its development.

Champlin's ordinance exceeds minimum state standards in some notable ways. A few of the ordinance's strongest improvements are:

- Inclusion of clear, strong standards to ensure that variances and CUPs do not negatively harm the river or its important features. This includes a requirement that structures may not request both a height *and* setback variance together.
- Lighting standards that will reduce light pollution, providing safer passage for migratory birds that rely on the Mississippi River Flyway.

We'd like to make a few small recommendations that could strengthen and clarify your ordinance:

**Recommendation: Additional mitigation options for variances and CUPs**

- (c)(3)a: Additional mitigation options to list could include:
  - Increasing, enhancing, and/or connecting habitat for pollinators, birds, and other wildlife
  - Increasing open space dedication

**Recommendation: Lengthen project notification period**

- (c)(8): We recommend adding this requirement (also recommended by the DNR): “The DNR will be notified at the time of application submittal of master plans, PUDs, preliminary, and final plats.” This provision was included in both Newport and Minneapolis’ ordinances.
- (c)(8)b: We also recommend lengthening the DNR and National Park Service notification period for discretionary actions from ten days to 30 days.

The DNR, in particular, can provide valuable technical assistance for reviewing plans and protecting natural resources; providing early notice gives more time for the DNR to do this and prevents surprises late in the process.

We’ve seen cities run into challenges when the DNR isn’t brought into planning processes early enough. If the DNR raises technical or compliance concerns on short notice, planning commission meetings become more confusing than they need to be and/or decisions end up delayed. Early engagement with the relevant agencies makes the process much smoother for all parties.

**Recommendation: Expand vegetation management standards**

The MRCCA ordinance offers an opportunity to promote healthy plant communities along the riverfront. Champlin could consider these additions to the Vegetation Management section of the ordinance:

- (e)(7)b: Consider adding “removal of healthy trees over four inches in circumference” to the list of activities for which a permit is required.
- (e)(7)e.6: We recommend that vegetation restoration plans must be prepared by “a qualified individual with demonstrable experience and knowledge related to management of natural areas such as natural resource manager or ecologist.”

FMR’s staff ecologists recommend this wording to ensure that the plans are prepared by someone with specific expertise in natural vegetation that not all lawn care professionals may have.

Please don't hesitate to contact me at [ctoberman@fmr.org](mailto:ctoberman@fmr.org) or 651-222-2193 x29 to discuss any of our comments further. FMR also has extensive MRCCA ordinance resources (including videos, handouts, and interactive maps) available at [www.fmr.org/river-rules](http://www.fmr.org/river-rules).

Thank you for your time and consideration.

For the river,

A handwritten signature in black ink that reads "Colleen O'Connor Toberman". The signature is written in a cursive style and is positioned above a light gray rectangular background.

Colleen O'Connor Toberman  
River Corridor Program Director