



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

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Emily Schmitz, Senior Planner  
City of Cottage Grove  
12800 Ravine Parkway S.  
Cottage Grove, MN 55106

Dear Emily:

Friends of the Mississippi River (FMR) appreciates the opportunity to comment on the Environmental Assessment Worksheet (EAW) for Pulte Homes' redevelopment proposal for the former Mississippi Dunes golf course.

Mississippi Dunes is a rare and ecologically valuable area. Sand dunes like these are an exceptionally rare landscape in the Twin Cities and across the state. The site also includes 1,900 feet of Mississippi River shoreline, provides habitat for several threatened and endangered species, and adjoins the Grey Cloud Dunes Scientific and Natural Area (SNA). All of these assets make Mississippi Dunes more fragile than most other redevelopment sites in Cottage Grove. Any redevelopment here must be done with the greatest of care.

Given the unique nature of this property and the area's rare ecological resources, this proposed project has the potential for significant environmental effects. Therefore Cottage Grove **should require an Environmental Impact Statement** for this proposed project.

We also request revisions to the following EAW sections:

**10. Geology, soils, and topography/land forms**

**11. Water resources**

The topography and soil types in the project area present special considerations. Because sandy soils are so absorbent, subsurface water movement through the site will be significant. The site's slope towards the river suggests that without mitigation, subsurface water runoff will move towards the river. Slope stability, water volume through the site, and impacts to neighboring sites from this water movement need to be carefully studied.

The EAW should include Minimal Impact Design Standards as a mitigation strategy for the potential project impacts to water resources. Mitigation should include a plan to incorporate stormwater treatment areas throughout the project area to treat water as closely to its source as possible, reducing the risk of harm from subsurface water movement. It will not be very feasible to pipe stormwater from one end of the site over to the other, so the project should not direct all stormwater to just one or two treatment areas as shown in Figures 4 and 5.

This area of the Mississippi River has high chloride levels. To mitigate harm from increased roadways and road salting in and around the project area, all chloride runoff should be captured on site. The project should also include a salt management plan to limit use of road salt on both public roadways and private driveways and sidewalks.

We also encourage the appropriate authorities to closely supervise Pulte Homes' adherence to its Stormwater Pollution Prevention Plan. Pulte Homes has a track record of Clean Water Act violations in at least five states.

### **13. Fish, wildlife, plant communities, and sensitive ecological resources**

Protection concerns for the rusty-patched bumble bee are not limited to the species' "active season." Rusty-patched bumble bees do not migrate; they are likely present at this site year-round. In the winter the queen bees hibernate underground a few inches below the surface. If the queens are killed by construction activity over the winter, the entire colony ceases to exist. The EAW must demonstrate the project's full compliance with the federal Endangered Species Act. The EAW should also include stronger analysis of rusty-patched bumble bees' habitat needs, construction timing, and protective practices that can be undertaken as mitigation strategies.

Bird Species in Greatest Conservation Need, including the endangered Henslow's sparrow, are documented to be present at the Mississippi Dunes site (not simply in the vicinity). Public eBird records by experienced birders document these rare birds' consistent presence. These birds are known to be very sensitive to habitat "patch size" and edge conditions for reproductive success. The proposed project will undoubtedly reduce the birds' habitat area and likely harm their already-fragile populations.

The EAW should include more mitigation strategies to protect these species. Additional mitigation strategies could include timing vegetation removal and grading outside of the birds' nesting season, arranging the site plan to enable as much contiguous habitat as possible, and employing an ecologist to design vegetation that doesn't further degrade adjacent habitat at the SNA by creating improper edge conditions on the Mississippi Dunes property.

The EAW should also include a plan to mitigate impacts of increased human visitorship at the neighboring SNA due to the addition of hundreds of residents next to the SNA. An increase in

off-trail human traffic in the SNA could be particularly harmful because of the site's fragile geology and rare plant species. Mitigation could include design elements (such as the platting home lots, adding trail connections, and using fencing or other barriers) to block egress to the SNA outside of existing trails.

This section should also state that the project's vegetation management practices must be fully compliant with the city's Mississippi River Corridor Critical Area (MRCCA) ordinance.

#### **14. Historic properties**

The project area has an extensive history of human use, including Indigenous settlement. Grey Cloud Island contains rare pre-contact archaeological resources, including Washington County's largest known concentration of burial mounds, and was the site of the only documented Indigenous village in the county. It is reasonable to believe that the Mississippi Dunes project area may also contain archaeological resources given its proximity to these documented sites.

As noted in the draft EAW's correspondence with the State Historic Preservation Office, the majority of archaeological sites in the state have not been recorded. A lack of documented resources on the project site should not be taken as an assurance that such resources do not exist.

Given the project's proximity to sites of immense historic significance, further study should be conducted before concluding that the proposed project will not adversely affect archaeological or cultural resources. The Prairie Island Indian Community, as well as any other interested tribes or Indigenous-led organizations, should be invited to consult on this study.

#### **15. Visual**

We disagree that "there are no scenic views or vistas identified in the city's MRCCA plan" (31). The Public River Corridor View from Hazen P. Mooers Park will be affected by this project. Mississippi Dunes is clearly visible in the photo of this view included in the city's MRCCA plan. The Public River Corridor View from the Grey Cloud Dunes SNA may also be affected. A visual analysis of the project's impacts to these views should be conducted as part of this EAW and appropriate mitigation strategies employed.

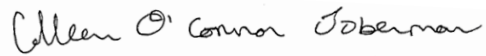
The goal of mitigation should be to preserve a view as similar to the existing view as possible, prioritizing vegetative screening and minimizing the visibility of new structures. Per the DNR, strategies to mitigate visual impacts can include:

- Using building materials that blend in with natural surroundings, such as green or brown materials

- Placing the long axis of structures perpendicular to the river
- Reducing the bulk of structures, such as by using flat roofs or reduced roof pitches
- Increasing setbacks from the river

Thank you for your attention to our comments.

Sincerely,

A handwritten signature in cursive script that reads "Colleen O'Connor Toberman". The signature is written in black ink on a white background.

Colleen O'Connor Toberman  
River Corridor Director