



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

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Dear Mayor Bailey, Councilmembers, and Commissioners:

Thank you for the opportunity to submit further comments on the Mississippi Dunes draft master plan.

Friends of the Mississippi River (FMR) appreciates our long-standing partnership with Cottage Grove and the many meetings and conversations into which you have welcomed FMR during the Mississippi Dunes planning process. However, we continue to believe that Cottage Grove can and should pursue more public parkland as part of this very rare redevelopment opportunity.

The community feedback included in the November 3 work session packet shows a strong resident preference towards preserving more open space at Mississippi Dunes. Roughly 50 letters and comments are almost unanimous about this. We weren't surprised to see this level of support for parkland, but we are disappointed at the city's response.

We continue to urge you to exercise your full planning authority and to work closely with funding partners eager to assist you in acquiring the additional parkland your residents are asking for.

City has authority over land use

We've been told many times that the city simply can't do anything to secure any additional parkland that the property owner might prefer to develop into housing. But cities have well-established legal authority to guide land use through zoning. The city is not required to rezone this property to accommodate the hundreds of housing units the developer has proposed.

The property's zoning will also influence the cost of purchasing it. The DNR, Washington County, and FMR funding can only be used to pay for park acquisition at fair market value as determined by an independent appraiser. Rezoning would likely significantly increase the land value and therefore the cost of park acquisition. Portions of the property that are desired

for parkland should continue to retain R-1 zoning in alignment with this intended use; this may result in a lower land value and better stewardship of taxpayer funds.

Cities can also condemn land for public use and purchase it at a fair market value. That may not be anyone's preferred route, but the option does exist. All of these municipal rights and powers give the city negotiating power to secure more public parkland at Mississippi Dunes despite a developer's wishes to the contrary.

FMR funding available

FMR remains interested in helping the city with a land purchase at fair market value. As stated in our October 7, 2021, letter to you, FMR has \$250,000 appropriated for habitat acquisition at Mississippi Dunes. For FMR to demonstrate the expected outcomes to our funder, the Lessard-Sams Outdoor Heritage Council, the city's Mississippi Dunes park would need to include at least 15 acres of wildlife habitat. These funds cannot be spent for the acres that will include paved trails, playgrounds, picnic tables and other typical community park features.

FMR also has its own modest fund to support the acquisition of valuable habitat near the Mississippi River. In order for us to consider contributing this additional resource to the Mississippi Dunes property, we would expect the city to expand its planned 33-acre city park by at least an additional 15 acres of wildlife habitat.

As we have discussed in the past, other public and private funding sources are likely available to support park acquisition, restoration, and management. We know that pursuing the funding needed will take time and effort. FMR is very experienced in assembling funds for land protection and remains willing to assist you. A partnership with The Conservation Fund or a similar entity could help bridge timing gaps during acquisition. The Conservation Fund has indicated an interest in supporting this project.

Larger park provides more benefits

The sand dunes in this area are an exceptionally rare landscape in the Twin Cities and across the state. The potential to provide recreational and ecological benefits for residents from Cottage Grove and beyond is high. There is no equivalent site elsewhere in the city. Many communities would be thrilled to have this kind of large Mississippi riverfront park creation opportunity.

As currently proposed, the Mississippi Dunes park is unlikely to serve existing Cottage Grove residents as much as it will serve residents of the future development. A 33-acre park is a neighborhood park, not a regional destination. While the Grey Cloud Dunes Scientific and Natural Area (SNA) next door provides more open space, it provides very limited recreational access. The SNA doesn't even offer official trails.

The potential to expand wildlife habitat by siting a larger Mississippi Dunes park next to the SNA is also important. We have reviewed experienced birders' records from both Mississippi Dunes and the SNA. It's clear that many grassland bird Species in Greatest Conservation Need are living at the former golf course, including the endangered Henslow's sparrow. (We presume that these same publicly available records are being incorporated into the Environmental Assessment Worksheet and would also encourage the city to require a full ecological resources inventory as part of the assessment process.)

Some of the bird species sighted at Mississippi Dunes have had population declines of over 90 percent since the 1960s. Habitat destruction is a significant factor; Minnesota has lost over 98 percent of its grasslands to development and agriculture. These particular species are also very sensitive to habitat "patch size" and won't reproduce on small tracts of land. Large, contiguous wildlife areas are needed to support these collapsing populations.

These wildlife habitats are also essential to human health. We're all part of the same complex ecosystem. Humans are dependent on plants and animals to help keep our air and water clean, to pollinate the plants we eat and sustain the planet that sustains us. We simply don't know enough to decide that sparrows and bees aren't important to human survival. Sometimes we don't fully understand the consequences of extinction until it's too late.

Grey Cloud Island's future uncertain

We have also heard Cottage Grove leaders say that a large Mississippi Dunes park isn't needed because there will eventually be a regional park on Grey Cloud Island. We certainly hope to see that someday. But the timing and scale of that park are not at all guaranteed. It may be decades before Aggregate Industries ends its operations and site remediation can even begin.

That remediation will be extensive and costly. Mississippi Dunes is already a beautiful habitat that can be restored with a fairly light touch, whereas the island is a degraded industrial pit mine. And housing is likely to be a substantial element of that future project, too. Cottage Grove is setting a precedent for prioritizing private development over public parkland, and there's no reason to believe that the outcome on Grey Cloud Island will be any different.

We encourage the city to act on what is within its control right now—Mississippi Dunes—rather than promising residents a distant better future on Grey Cloud Island. That is going to be a much more difficult and expensive project many years from now. By the time a Grey Cloud Island park is open, today's children will be grown. Why deprive them of a great riverfront park when this rare opportunity is sitting right in front of you today?

In summary, there are many strong reasons for Cottage Grove to opt for more parkland at Mississippi Dunes, and many tools and partners available to assist you with that. We hope

that you will act now to preserve this rare opportunity for the community before it's too late to change course.

Sincerely,

A handwritten signature in black ink, reading "Whitney L. Clark". The signature is written in a cursive style with a large initial "W" and a distinct "L" and "C".

Whitney L. Clark
Executive Director