

Minnesota Department of Natural Resources

Ecological and Water Resources Division

16543 Haven Road,
Little Falls, Minnesota 56345



September 17, 2014

Mr. Bryan Schafer
Director of Community Development
City of Blaine
10801 Town Square Drive NE
Blaine, Minnesota 55449-8101

Re: Parkside North Environmental Assessment Worksheet

Dear Mr. Schafer:

The Minnesota Department of Natural Resources has reviewed the Environmental Assessment Worksheet prepared for the Parkside North mixed-use development project. We also obtained and reviewed the Finn Farm North Wetland Delineation Report by Kjolhaug Environmental Services and the June 10, 2014 vegetation report by Critical Connections Ecological Services as part of our review. We offer the following comments for your consideration.

Based on our review, we find that the proposed avoidance of the higher-value wetlands, the re-establishment of native-dominated wetland vegetation, and the buffering of wetlands are positive features of the project. However, we have concerns about the impacts to rare species (the state-listed threatened *Rubus fulleri*, a species of bristle-berry) and the loss of the mature oak woodland containing healthy American elm. We recommend that the project proposers explore alternative designs that protect these features and incorporate them into common areas that will also enhance the landscape experience of residents.

Impacts to *Rubus fulleri* population

R. fulleri is a species of raspberry found in five upper Midwestern states, including Minnesota. Prior to the discovery of this species at this site, there were about twelve known occurrences in the state.¹ While this species is not well studied, we know that it is found almost exclusively on sand plains, typically in swales or wet meadows where groundwater is close to the surface. It may also be found in adjacent uplands if there is direct sunlight and little competition. It is known to be sensitive to grazing, changes in groundwater levels, and physical disturbance of its habitat.²

Our primary concern involves the proposed impacts to the population of *R. fulleri*. We have concerns that the 0.2 acre outlot set aside for this species may be too small to accommodate the

¹ From Species Status Sheet for Proposed Amendment of Minnesota Rules, Chapter 6134: Endangered and Threatened Species Statement of Need and Reasonableness, August 10, 2012, appended to June 10, 2014 letter from Critical Connections Ecological Services to Kjolhaug Environmental Services.

² This paragraph based on Smith, W.R. 2008. Trees and Shrubs of Minnesota. Minnesota Department of Natural Resources. University of Minnesota Press, Minneapolis and London.

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natural processes needed to maintain a viable population. While development of a species management plan was mentioned in the EAW, management of any species requires the preservation of its ecological niche. The immediate area surrounding this remnant population will be impacted by the landscape changes planned by the project. Installation of nearby stormwater features has the potential to lower the groundwater table, increase drainage, and change the hydrologic conditions that have allowed the plant population to establish. The removal of the adjacent woodland will alter the light regime and change vegetation distribution, increasing the potential for invasive species.

We recommend that the buffer area surrounding the remnant population be increased, with retention of adjacent woodland. This would maintain more of the existing environment upon which the population depends. Please note that Minnesota's endangered species law (*Minnesota Statutes*, section 84.0895) and associated rules (*Minnesota Rules*, part 6212.1800 to 6212.2300 and 6134) prohibit the taking of threatened or endangered species without a permit from the Minnesota DNR.

Impacts to Mature Woodland

The 16-acre woodland that the EAW describes as "Oak Forest (Central) Mesic Subtype" is dominated by 12-inch to 24-inch diameter red and white oaks, paper birch, red maple, American elm, and common elderberry and prickly ash. The wetland delineation report provides a more comprehensive assessment of the vegetation that includes a number of native species. The presence of mature American elm remaining in the overstory of this woodland is a rare occurrence. Most American elms in Minnesota have been devastated by the Dutch elm disease, and we consider the remaining ones worth preservation.

We recommend that project proposers consider design alternatives that would set aside the 16-acre woodland as a natural area, thereby preserving and incorporating it into the new community.

Other Comments

Item 6e, Future stages. This should be marked as "Yes". The preliminary grading exhibit (Figure 4) clearly shows that streets and four lots are shared with the Woodland Village 5th Addition development.

Item 7, Cover types. Page 12 indicates 2.06 acres of wetlands will be filled, while page 16 indicates 0.69 acres of wetlands will be converted. This apparent discrepancy should be clarified.

Item 11, Surface waters. Wetlands within the project may harbor a suppressed seedbank of native species. While *R. fulleri* was the only rare species identified within the project boundary, it is possible that other rare wetland species persist in the seed bank under the root masses of reed canary grass. This has been observed at nearby Pioneer Park, where state-listed species have re-established following removal of reed canary grass biomass. We recommend that wetland management plans include the removal of reed canary grass rootmass in an effort to restore rare plant species such as lance-leaved violet, twisted-eye grass, cross-leaved milkwort, tubercled rein-orchid and sundews.

Item 11, Water resources (groundwater). We recommend that the project incorporate groundwater conservation features such as stormwater re-use for landscape irrigation, deeper topsoil in landscaped areas, and drought-tolerant native vegetation for landscaped common areas.

Item 13a, Fish and wildlife resources. Attached is a list of bird species documented by the Minnesota Breeding Bird Atlas within the 9 mi² survey block that contains this project site. The two species of particular interest are sandhill crane and ovenbird, which have been shown to be adversely affected in their distribution by Twin Cities urbanization.³ Ovenbird in particular needs large woodland tracts with deep leaf litter for successful nesting. This further supports the retention of woodland that exists on the site.

Item 13d, Mitigation measures. As noted in the Natural Heritage Information System (NHIS) report, the project falls within a priority area for the state-threatened Blanding's turtle. The Blanding's turtle factsheet attached to that document should be given to all project contractors to inform them of appropriate actions. Also referenced in the NHIS report, we recommend the use of "wildlife-friendly" erosion control materials to avoid mortality to wildlife. This is especially important in areas around wetlands where a diversity of small mammals and herpetofauna are active.

We appreciate the opportunity to review this project. Please direct any questions regarding these comments to Brooke Haworth, DNR Central Region Environmental Assessment Ecologist, at 651-259-5755.

Sincerely,



Liz Harper
Assistant Regional Manager, Central Region
MnDNR Division of Ecological and Water Resources
1200 Warner Road, St. Paul, MN 55106

ERDB 20140334
Attachment (Breeding Bird Atlas results for T31R23a)

³ North, M.R., and W.E. Faber. In review. The Effect of Twin Cities Metropolitan Area Development on Regional Breeding Bird Distributions. Submitted to The Loon.

2009-13 Results for T31R23a (T31R23a)

Species	Results	Species	Results
Canada Goose	Observed (O)	Wood Duck	Confirmed (FL)
Mallard	Probable (S)	Wild Turkey	Observed (O)
Pied-billed Grebe	Confirmed (FL)	Great Blue Heron	Possible (X)
Great Egret	Observed (O)	<i>Bald Eagle</i>	Observed (O)
Sandhill Crane	Observed (O)	Killdeer	Confirmed (NY)
Mourning Dove	Confirmed (NY)	Red-bellied Woodpecker	Observed (O)
Downy Woodpecker	Probable (S)	American Kestrel	Observed (O)
Eastern Wood-Pewee	Probable (T)	Eastern Phoebe	Probable (T)
Great Crested Flycatcher	Observed (O)	Eastern Kingbird	Observed (O)
Warbling Vireo	Observed (O)	Blue Jay	Possible (X)
American Crow	Probable (S)	Northern Rough-winged Swallow	Probable (M)
Tree Swallow	Possible (X)	Barn Swallow	Confirmed (ON)
Cliff Swallow	Possible (X)	Black-capped Chickadee	Confirmed (NY)
White-breasted Nuthatch	Possible (X)	House Wren	Probable (M)
Blue-gray Gnatcatcher	Possible (X)	American Robin	Confirmed (FL)
Gray Catbird	Probable (S)	European Starling	Possible (X)
Cedar Waxwing	Observed (O)	Ovenbird	Possible (X)
Common Yellowthroat	Probable (S)	Yellow Warbler	Observed (O)
Chipping Sparrow	Probable (S)	Song Sparrow	Confirmed (FY)
Northern Cardinal	Confirmed (NY)	Red-winged Blackbird	Probable (C)
Common Grackle	Probable (S)	Brown-headed Cowbird	Possible (X)
Baltimore Oriole	Observed (O)	House Finch	Possible (X)
American Goldfinch	Observed (O)	House Sparrow	Observed (O)