

# 2040 REGIONAL PARKS POLICY PLAN

*Public Hearing Report  
August 27 through October 30, 2014*



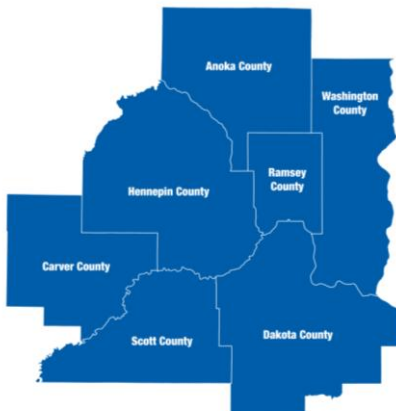
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The Metropolitan Council is the regional planning organization for the seven-county Twin Cities area. The Council operates the regional bus and rail system, collects and treats wastewater, coordinates regional water resources, plans and helps fund regional parks, and administers federal funds that provide housing opportunities for low- and moderate-income individuals and families. The 17-member Council board is appointed by and serves at the pleasure of the governor.

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## Public Hearing Report Overview

The 2040 Regional Parks Policy Plan Public Hearing Report summarizes the comments received on the draft 2040 Regional Parks Policy Plan. The draft plan was released for the purposes of public comment on August 27, 2014 and comments were accepted through October 30, 2014. During that time, the plan was available on the Council's website and through printed copies as requested.

The following spreadsheet summarizes the comments received, who made the comment, the staff response to the comment, and any text changes made to the 2040 Regional Parks Policy Plan.

In sum, 140 individuals provided their comments on the draft 2040 Regional Parks Policy Plan during the public comment period. A total of 15 individuals provided their oral testimony at the public hearing and the remaining submitted written comments.

Individuals who contributed their comments represented a range of constituents, including:

- Regional Park Implementing Agencies--13
- City/Township/Local Government--14
- County Governments--2
- State or Federal agency--3
- Organizations--54
- Residents--54

Based on comment content, a total of 456 individual comments were received. The following pages include a list of contributors, followed by the all of the comments received organized by theme.

A written record of all of the comments made via letter, email, or on the phone is available from the Metropolitan Council upon request.

## How To Use This Document

This document is quite large and is not intended to be printed.

The public hearing report summarizes the comments received, who made the comment as identified by their comment ID number, and the staff response to the comment.

The comments are organized by theme. Many people made similar comments so a generalized summary of comments is preceded by the identifying number of the persons or groups who made the comment. The contributor is identified with their corresponding comment ID number, which can be located in the far left hand column on pages 3 through 7.

## 2040 Regional Parks Policy Plan Public Hearing Report

### List of Comment Contributors

Comment ID	Organization	Name
1	City of Crystal	John Sutter
2	Resident	Mike Fine
3	City of Cottage Grove	Mayor Bailey
4	Sierra Club--North Star Chapter	Michelle Gobely
5	Resident	Jennaya Williamson
6	City of Burnsville	Heather Johnston
7	Dakota County	Liz Workman
8	Scott County	Tom Wolf
9	Resident	Phyllis Droher
10	Parks and Trails Legacy Advisory Committee	Lynnea Atlas Ingebretson
11	Carver County	Gayle Degler
12	City of Elko New Market	Thomas Terry
13	Sierra Club--North Star Chapter	Jill Boogren
14	City of Orono	Jessica Loftus
15	City of New Hope	Susan Rader
16	City of Edina	Ann Kattreh
17	Division of Indian Work	Shanah Regguinti
18	Division of Indian Work	Marisa Carr
19	Anoka County	Karen Blaska
20	City of Richfield	Jim Topitzhofer
21	Resident	Jeffrey Anderson
22	City of Robbinsdale	Regan Murphy
23	Sierra Club--North Star Chapter	Penny Edgell
24	Sierra Club--North Star Chapter	K Feilmeyer
25	City of Saint Paul	Mike Hahm
26	Minneapolis Park and Recreation Board	Liz Wielinski
27	Sierra Club--North Star Chapter	Jennifer Harmening Thiede
28	Resident	Laura Hurley
29	Sierra Club--North Star Chapter	Bryan Wyberg
30	Sierra Club--North Star Chapter	John Schneider
31	Sierra Club--North Star Chapter	Denise Thomas
32	Sierra Club--North Star Chapter	Jonathan Cook

33	Sierra Club--North Star Chapter	Amber Garlan
34	City of Saint Paul	Mike Hahm
35	Sierra Club--North Star Chapter	Kathy Magne
36	Sierra Club--North Star Chapter	Anne McManus
37	Sierra Club--North Star Chapter	Janet Neihart
38	Sierra Club--North Star Chapter	Alice Hausman
39	Sierra Club--North Star Chapter	Mary Engen
40	Sierra Club--North Star Chapter	Ordell Vee
41	Sierra Club--North Star Chapter	Judy Lissick
42	Sierra Club--North Star Chapter	Heather Hundt
43	Resident	Art Link
44	Resident	Sue Schedin
45	Resident	Brad Moir
46	Resident	Wendy Paulsen
47	Resident	Jeremy Spring
48	Resident	John Bergquist
49	Resident	Patricia Ryan
50	Resident	Pat Stevesand
51	Resident	Dianne Rowse
52	Resident	John Carlson
53	City of Maple Grove	Terry Just and Chuck Stifter
54	Resident	Mark Schaenzer
55	City of Champlin	Charles Lehn
56	Resident	Amy Freeman
57	Resident	Patricia Lueth
58	Resident	Maryann Passe
59	Friends of the Parks and Trails of Saint Paul and Ramsey County	Jeanne Weigum
60	Resident	Michael Scheller
61	Resident	Barry Johnson
62	Resident	Reverend Thomas Jenkins
63	Resident	Roger Foster
64	Resident	Rob Chase
65	Resident	Pamela Carlson
66	Resident	Cassie Swanson

67	Resident	Molly Morgan
68	Resident	Christie Soderling
69	Voices for Racial Justice	Gabriella Anais Deal-Marquez, et al
70	Resident	Jackie and David Beyer
71	Resident	Andrew Novak
72	Resident	Anne LaGoo
73	Resident	Peggy Pasillas
74	Resident	Jim Winslow
75	City of Shorewood	William Jones
76	Resident	Jean Oberle
77	Resident	Pat Schoenecker
78	Trust for Public Land	Susan Schmidt
79	Resident	Tim Riehle
80	Resident	Heidi Pearce
81	Resident	Melissa and Chris Gross
82	Resident	Dee Parker
83	Women Observing Wildlife	Catherine Zimmer
84	Sierra Club--North Star Chapter	Alex Tsatsoulis
85	Resident	Laurel Regan
86	Three Rivers Park District	John Gunyou
87	Resident	Edric Lysne
88	Resident	Cathy Swanson
89	Hennepin County	David Jaeger
90	Minnesota Department of Health	Kristen Raab
91	Sierra Club--North Star Chapter	Larry Yank
92	Resident	John Quinn
93	Wilderness in the City	Holly Jenkins
94	Resident	Ed Ambrose
95	National Parks Service	John Anfinson
96	Resident	Mike Fedde
97	Resident	Lynn Utecht
98	Resident	Jessica Swanson
99	Resident	Bob Gold
100	Minnesota Department of Natural Resources	Keith Parker
101	Carver County	Nate Kabat

102	Anoka County	Rhonda Sivarajah
103	Washington County	Autumn Lehrke
104	Sierra Club--North Star Chapter	Benjamin Krohling
105	Sierra Club--North Star Chapter	Kristina Delaudreau
106	Sierra Club--North Star Chapter	Carolyn Wilberg
107	Sierra Club--North Star Chapter	Nellie Harris
108	Sierra Club--North Star Chapter	Diane Borgmann
109	Sierra Club--North Star Chapter	Ben Zimmerman
110	City of Minneapolis	D Craig Taylor
111	Resident	Laura Hedlund
112	Sierra Club--North Star Chapter	Barbara Stamp
113	Sierra Club--North Star Chapter	Angela Anderson
114	Sierra Club--North Star Chapter	Harold Anderson
115	Sierra Club--North Star Chapter	Mrs Duane Gustafson
116	Sierra Club--North Star Chapter	Mackenzie Huth
117	Sierra Club--North Star Chapter	Nancy Hauer
118	Sierra Club--North Star Chapter	Jeff Boogren
119	Sierra Club--North Star Chapter	David Hegdahl
120	Sierra Club--North Star Chapter	Laurence Margolis
121	Sierra Club--North Star Chapter	Paul Moss
122	Sierra Club--North Star Chapter	Paul Wilburg
123	Sierra Club--North Star Chapter	Jennifer Kedward
124	Hope Community	Chaka Mkali
125	City of Plymouth	Diane Evans
126	YWCA	Therese Genis
127	Resident	Bill Weir
128	Resident	Henry Jimenez
129	KweStrong	Lisa Skjefte and Korina Barry
130	Neighborhood House	Allie Riley
131	Friends of the Riverfront	Edna Brazaitis
132	Resident	Laura Hedlund
133	City of Saint Paul	Mike Kimble
134	Resident	Bob Klanderud
135	Resident	Jake Verdin

136	Three Rivers Park District	Boe Carlson
137	Three Rivers Park District	Jonathan Vlaming
138	Little Earth Community	Kai Yang
139	Wilderness in the City	Maryann Passe
140	Sierra Club--North Star Chapter	Jean Ross



Line ID	Comment ID	Theme	Comment	Response
1	132	Development	Concerned about spending nearly \$1 billion for asphalt in parks.	Comment noted.
2	134	Development	Concerns by Native Americans about amount of riverfront and city planning being done on what was their sacred ground.	Comment noted.
3	78	Development	The demand for regional parks located in the Urban Center communities will only increase as population forecasts that underpin Thrive show that demographically diversifying residents will increasingly embrace life in high-density communities.	The cities of Minneapolis and Saint Paul are well-served by the regional parks system. The Minneapolis Park and Recreation Board is acquiring land and developing new park and trail features at Above the Falls Regional Park. Saint Paul is planning and developing regional trails as part of its Grand Round to meet future demands for regional parks and trails.
4	139	Development	An even distribution of minimally developed space needs to be provided for everyone.	Comment noted.
5	100	Development	Pages 66-68 public water access: it is encouraging to see the priority identified for land acquisition that provided access to public water, with the perceptive identification of the risks of letting undeveloped waterfront land slip away.	Comment noted.
6	137	Development	It's impossible to build a new regional park in the first ring suburbs. Do not want the 2040 Regional Parks Policy Plan to constrain creative thinking. Council should soften the language on what is "regional".	The 2040 Regional Parks Policy Plan includes bridging facilities as a potential type of special recreation feature. The bridging facility concept provides flexibility to regional park implementing agencies that are interested in using their expertise and creativity to develop a facility that would attract and introduce new users to the regional parks system. The designation by the Council of parks and trail as "regional" is the gateway to funding provided by the residents of the region as well as the State of Minnesota. The Council is the fiscal agent for these funds and must ensure that these amenities are regionally significant and regionally balanced, rather than solely serving a local audience.

Line ID	Comment ID	Theme	Comment	Response
7	102	Development	The 2040 Regional Parks Policy Plan proposes adding a new category of Special Recreation Features, referred to as "bridging facilities." How would bridging facilities be defined in the regional park classification system? How would the program be financed? Do bridging facilities constitute new lands, leased spaces, facilities, nodes along trail corridors, at malls, or at transit stops? Are they temporary or permanent? Are they of flexible design that changes with technological and demographic changes? Are they principally marketing techniques or recreation services?	Bridging facilities are defined in the 2040 Regional Parks Policy Plan as a type of special recreation feature. The bridging facility concept provides flexibility to regional park implementing agencies that are interested in using their expertise and creativity to develop a facility that would attract and introduce new users to the regional parks system. A bridging facility would be eligible for funding through the Park Acquisition Opportunity Fund, the Regional Parks Capital Improvement Program and Parks and Trails Legacy Funds upon Council approval of a master plan. As capital improvements, they are not intended to be temporary recreation facilities.
8	102	Development	The Council needs to work closely with the park agencies to study the concept of operationalizing "bridging facilities" into the 2040 Regional Parks Policy Plan and funding programs. There are many questions that need to be answered, including the efficacy of any such new facilities or services. Best practices from other major metropolitan areas should be studied. Consideration could be given to pilot projects implemented at key locations in the metro area, to better understand potential outcomes. If enacted, funding for this new category of facilities should not compromised existing regional park funding streams.	The bridging facility concept provides flexibility to regional park implementing agencies that are interested in using their expertise and creativity to develop a facility that would attract and introduce new users to the regional parks system. Similar to other special recreation features, development of a bridging facility is strictly optional, if an agency chooses to pursue it. A bridging facility would be eligible for funding through the Park Acquisition Opportunity Fund, the Regional Parks Capital Improvement Program and Parks and Trails Legacy Funds upon Council approval of a master plan.
9	90	Development	Support Siting and Acquisition -Strategy 1: Land with natural resource features and/or access to water will have priority over other proposed park land.	Comment noted.
10	110	Development	Page 25: It could also be clarified that private operations may function within the boundaries of regional parks, as vendors or accessory uses, to provide services and amenities to park visitors.	Additional language has been added to Recreation Activities and Facilities - Strategy 1.

Line ID	Comment ID	Theme	Comment	Response
11	110	Development	Page 44: We are excited to continue working with local and regional partners to implement projects identified in figure 3-7, including the Above the Fall Regional Park and the Intercity Regional Trail connection.	The Council looks forward to working with its partners to assist in the implementation of regional park and trail master plans.
12	110	Development	Page 67: We support the development of the Above the Falls Regional Park to create regional park amenities more in direct proximity to lower income areas of the city and region.	Comment noted.
13	110	Development	Page 70: Regarding so-called bridging facilities: Could the plan provide some examples? It's still unclear exactly what these are.	The 2040 Regional Parks Policy Plan includes bridging facilities as a potential type of special recreation feature. The bridging facility concept provides flexibility to regional park implementing agencies that are interested in using their expertise and creativity to develop a facility that would attract and introduce new users to the regional parks system.
14	110	Development	Page 70: How can special recreation features meet the goals outlined in the <i>Thrive</i> document?	Special recreation features can help the Council meet the Thrive MSP 2040 outcomes of Stewardship, Equity, Livability, and Sustainability through protecting natural resources, creating choices for all residents to recreate, and providing access to nature and outdoor recreation.
15	131	Development	Recommend caution in profit making ventures (pay to play)--they take on a life of their own that end up excluding some people. Whole buildings have been privatized and no one can use them except for the private entity.	Comment noted.

Line ID	Comment ID	Theme	Comment	Response
16	11	Development	The new category for Special Recreation Features of "Bridging Facilities" is perplexing to park implementing agencies since sound examples have not been provided. Resources are better applied to bridging programs to determine level of interest and if capital investment is warranted.	The 2040 Regional Parks Policy Plan includes bridging facilities as a potential type of special recreation feature. The bridging facility concept provides flexibility to regional park implementing agencies that are interested in using their expertise and creativity to develop a facility that would attract and introduce new users to the regional parks system. Similar to other special recreation features, development of a bridging facility is strictly optional, if an agency chooses to pursue it.
17	26	Development	We are supportive of the acquisition section of the 2040 Regional Parks Policy Plan and especially appreciate aspects that: a) allow for acquisition of land when it is available, even though that may be years ahead of park development dollars and plans being available; b) encourage implementing agencies to plan far ahead for acquisitions that may not happen for years, even decades, by gathering pre-due diligence data about the parcels; c) prioritize land to acquire according to its condition (high quality natural resources, for example) or proximity to water or other important features within the existing regional parks system; d) support the need to add regional park amenities in direct proximity to lower income areas; and e) recognize the threat of redevelopment (or development in more rural areas) within regional park boundaries, and provides options for pre-acquiring these properties so they are not lost for many years to come.	Comment noted.

Line ID	Comment ID	Theme	Comment	Response
18	8	Development	Pages 57-60. As the region considers equitable use of the regional park and trail system, we will need to have a conversations about what types of park use impact equity. We have planned and developed a system that is based on European-American lifestyles. As we look at more diverse populations, diverse park users may not share the same interests.	In 2013, the Council began to explore what will impact park use equity and the policy plan expresses a clear commitment to continue to do so. Research among select communities of color, conducted by the Council, revealed interests are diverse. The Council is committed to ensuring that preferences that reflect all the region's residents are considered in park and trail decision making.
19	4, 13, 23, 24, 27, 29, 30, 31, 32, 33, 35, 36, 37, 38, 39, 40, 41, 42, 84, 89, 90, 91, 95, 104, 105, 106, 107, 108, 109, 110, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 126, 128, 140	Equity	Support the Policy Plan's focus on strengthening equitable use of regional park system.	Comment noted.
20	110	Equity	Support for identifying, developing, and implementing clear metrics that support the evaluation of regional programs and funding sources through an equity lens.	Comment noted.

Line ID	Comment ID	Theme	Comment	Response
21	110	Equity	<p>We support the ongoing discussion and inclusion of equity as a lens through which regional resources are viewed. The regional park system should be a model for equitability in terms of access, natural resources, programming, and funding. We look forward to continued work with the Met Council to define how equity will be implemented through the regional parks system, particularly when it comes to adopting local comprehensive plans and their supporting small area plan documents. Local plans provide a great opportunity to address equity, particularly in terms of access, where these plans interact with the regional park system. Furthermore, we support exploring new metrics that demonstrate progress on the goals outlined in the Thrive MSP 2040 document as they apply to the regional parks system. Evaluations of our past, current, and proposed policies need to demonstrate the impact that investments are having on goals such as equity. We look forward to developing these evaluative measures as well as the "equity toolkit" as identified in the plan in partnership with the Met Council.</p>	<p>The Council looks forward to working with local communities to implement Thrive MSP 2040 and the associated system and policy plans. Involvement from key stakeholders is important to ensure progress on the Thrive outcomes, as well as the tools that will assist us to achieve those outcomes, including the equity lens and Regional Parks Equity Toolkit.</p>
22	110	Equity	<p>Page 8: In reference to the following text, "Strengthen equitable usage of regional parks and trails by all our region's residents, such as across age, race, ethnicity, income, national origin, and ability." It is unclear whether or not this language indicates the possibility for flexibility in how parks are programmed, or if it means that every park will have minimum requirements that need to be met, or perhaps both.</p>	<p>The quote referenced on page 8 is taken directly from Thrive MSP 2040. The Thrive document did not speak to programming or minimum threshold requirements. Several strategies are identified in the 2040 Regional Parks Policy Plan to strengthen equitable usage. However, there is no specific directive related to programming, as operations of the regional parks system falls under the purview of the regional parks system implementing agencies. The policy plan identifies strategies that incorporate our role in the regional parks system.</p>

Line ID	Comment ID	Theme	Comment	Response
23	110	Equity	Page 9: Racial and ethnic disparities as they apply to recreational access and use are a major concern. The plan should focus on prioritizing investments in parks, trails, and recreational amenities in underserved areas with diverse populations, particularly Racially Concentrated Areas of Poverty (RCAPs). Additionally, how will the Council measure the impact of policies and investments on communities?	By and large, state statute determines how funds are distributed to the ten regional park implementing agencies (see page 24 in the policy plan). As such, it is not possible for the Council to prioritize investments to distinct geographic locations throughout the region. The ten regional park implementing agencies can prioritize their allocation toward underserved areas. Details related to monitoring and measuring the impact of Council policies and investments will need to be determined in 2015, after the development of Regional Parks Equity Toolkit, Equity Grant Program, among other plan implementation details.
24	110	Equity	Pages 14-15: The broad overview of the regional system is helpful here, but it would be nice to have a more in-depth review that set the plan up for discussions about connectivity and equity - among other issues. What is the geographic distribution of these facilities? What populations do they serve? The answers to these questions may guide future investments.	The geographic distribution of the Regional Parks System is available within the plan. Please see Chapter 3. In terms of who the Regional Parks System serves, a visitor survey was last conducted in 2008. The Council plans to conduct another system-wide visitor survey in 2016.
25	110	Equity	Page 22: The focus on equity, while applauded by City staff, lacks some focus and definition. Both the Thrive document and the Parks Policy Plan document lack details on what measurements will be used to track whether or not equity issues are being addressed. One resource to consider is the research done by the Dukakis Center at Northeastern University where a rating system for Transit Oriented Development considered metrics that were intended to evaluate equity as an outcome (see <a href="http://www.northeastern.edu/dukakiscenter/wp-content/uploads/eTOD_StationAreaRatingSystem_01092013.pdf">http://www.northeastern.edu/dukakiscenter/wp-content/uploads/eTOD_StationAreaRatingSystem_01092013.pdf</a> ). Perhaps this work could be translated to apply to our regional parks investments.	The 2040 Regional Parks Policy Plan does not include any measures or indicators. The indicator work is being prepared in a separate document by the Council's Regional Policy and Research unit, which will be available for review sometime in 2015.

Line ID	Comment ID	Theme	Comment	Response
26	110	Equity	<p>Page 24: "The Regional Parks System primarily consists of lands located in a high-quality natural resources setting that are contiguous to lakes, rivers, or other water bodies." This statement should be considered through an equity lens. These high-amenity areas are also (not by coincidence) often some of the more affluent areas in the region. Serving populations in lower income areas may mean creating or restoring natural amenities where there currently is little or none - or investing in other systems that help connect areas such as RCAPs to existing regional parks. Staff supports the language found on page 31 that is line with our above comment, "Areas selected for regional parks should contain a diversity of nature-based resources, either naturally occurring or human-built."</p>	<p>The quote on p. 24 is referencing the existing Regional Parks System, as it stands in 2014. The Regional Parks System is a nature based system and given this, it is inherently comprised of elements cited on p. 24. That said, the Council acknowledges the metropolitan area comprises various levels of development and as such, the clause on page 31 attempts to capture that range to support geographic balance throughout the region.</p>
27	110	Equity	<p>Page 29: The City of Minneapolis questions whether or not equity goals will be attainable when considering the location of RCAPs and their proximity to existing regional facilities. If new investments are required, is it realistic that the size of such investments be limited to the size of a regional park as currently defined? The equity goal becomes difficult to achieve as more restrictions are put upon jurisdictions that are tasked with carrying out these goals. Staff does not necessarily suggest changing these standards, rather, we point out this issue to raise awareness of the fact that some new methods may be needed to address the needs of some park users.</p>	<p>The policy plan does not specifically target any of the equity-related policies to any geographic location, most notably target RCAPs. The goal of strengthening equitable usage of regional parks and trails will be a region-wide effort.</p>



Line ID	Comment ID	Theme	Comment	Response
28	110	Equity	Page 67: It is no accident that these are also among the most affluent areas of the region. The equity strategy should address this directly, to ensure that resources are restored and enhanced in other areas of the region as well - not just those naturally endowed with the most appealing features. As previously mentioned, staff supports a regional park definition to include human-built landscapes (page 31).	The content noted on page 67 is related to the Council's siting and acquisition policy. The content in that section is not defining a regional park, but is outlining criteria for lands that should be brought into the regional park system.
29	110	Equity	Page 82: "Where appropriate, equity will be a consideration in Regional Parks System funding and investment ." Equity should always be considered, it is unclear how "where appropriate" would be determined and applied. We suggest you strike the term "where appropriate."	The amount of money each regional park implementing agency receives is, in most cases, allocated by a formula specified in state statute (See overview on page 24 of the policy plan). Based on the Council's definition of equity, none of measures in the formula are directly related to equity. Subsequently, qualifiers to the statement were called for given our statutory limitations.
30	110	Equity	Page 82: "As of 2014, the Council does not have an equity lens developed." The City of Minneapolis looks forward to resolution on this issue. As previously suggested, there are examples to work from nationally that attempt to define and measure equity outcomes. One resource to consider is the research done by the Dukakis Center at Northeastern University where a rating system for Transit Oriented Development considered metrics that were intended to evaluate equity as an outcome (see <a href="http://www.northeastern.edu/dukakiscenter/wp-content/uploads/eTODStationAreaRatingSystem_01092013.pdf">http://www.northeastern.edu/dukakiscenter/wp-content/uploads/eTODStationAreaRatingSystem_01092013.pdf</a> ). Perhaps this work could be translated to apply to our regional parks investments.	Suggestion noted.

Line ID	Comment ID	Theme	Comment	Response
31	110	Equity	Page 83: How does the Metropolitan Council's recent equity report factor into this discussion?	The Council has not recently published an "equity report". The Council, however, did publish a study in 2014 entitled "Regional Park Use Among Select Communities of Color". The findings from that report informed the development of many of the equity-related policy strategies in the 2040 Regional Parks Policy Plan.
32	101	Equity	<p>Pg. 83 dedicates significant language to describing development of an "equity lens" and an "equity toolkit" that implementing agencies would need to use when developing project proposals to the Council. However the last paragraph states, "The Regional Parks System equity toolkit will not be used for screening purposes or to determine eligibility of funding, but will provide the Council a mechanism to track and monitor progress toward strengthening equitable use of the Regional Parks System." a. The statement, "The Regional Parks System equity toolkit will not be used for screening purposes or to determine eligibility of funding, but will provide the Council a mechanism to track and monitor progress toward strengthening equitable use of the Regional Parks System," is contradictory to language in statements about the Council's role in assessing the ranked list of priority projects and that the Council will seek to determine if proposed projects should be reprioritized. This is a form of screening. We request the Council to clearly define the equity lens, equity toolkit, and implementation of these policies prior to adoption of the Regional Parks Policy Plan.</p> <p>b. We suggest that the Council take the lead on collecting data to track its goals rather than developing unfunded</p>	Clarity has been added to this section. The equity lens and equity toolkit will be developed in 2015, after which implementation will occur after Council adoption. The 2040 Regional Parks Policy Plan specifies additional resources will be made available to conduct further research, including more frequent visitor surveys among other data collection.

Line ID	Comment ID	Theme	Comment	Response
33	101	Equity	<p>Pg. 83 states, “Using the Regional Parks System equity toolkit, the Metropolitan Parks and Open Space Commission and Council will be involved in the prioritization of the project list proposed for funding for the Capital Improvement Program and Parks and Trails Legacy Fund,” then later states, “It is important to note that the review of proposed projects will in no way alter an agency’s share of funding received from either the Capital Improvement Program or the Parks and Trails Legacy Fund,” and goes on to state, “The Regional Parks System equity toolkit will not be used for screening purposes or to determine eligibility of funding, but will provide the Council a mechanism to track and monitor progress toward strengthening equitable use of the Regional Parks System.” a. These statements are contradictory and confusing. We request that the Council clearly explain how the equity toolkit will be used prior to adoption of the Regional Parks Policy Plan. b. We request that any criteria developed to award grants related to advancing equity goals be such that any implementing agency has a reasonable opportunity to successfully apply. We request that new funding be provided to address equity that does not rely on an inconsistent funding stream of unmatched Council Bonds.</p>	<p>Clarity has been added to this section. In terms of the proposed Park Equity Grant Program, each regional park implementing agency will have equal opportunity to apply for the competitive funds available. The Council does not currently have access to another funding stream other than that proposed. Given equity is priority for the Council, the use of Council bonds is warranted to achieve the desired aim.</p>

Line ID	Comment ID	Theme	Comment	Response
34	95	Equity	In 2016, the National Park Service (NPS) will celebrate its 100th Anniversary. The primary goal of our centennial campaign is “to connect with and create the next generation of park visitors, stewards and supporters.” We know that to be relevant in our second century we have to engage new and diverse audiences. For many of the reasons identified in your plan, the NPS is not attracting these audiences. We know that if we can get people to their local or regional parks, we will have a better chance of getting them to national parks. The more the Met Council succeeds at attracting new and diverse audiences to its parks, the better chance we have of succeeding.	The Council continues to look forward to working alongside our regional park implementing agencies, state, and federal partners to strengthen usage of all parks and trails.
35	2	Equity	Parks have equity and access. You are building in needs that do not exist.	Council research has identified disparities exist as it pertains to both use and access to regional parks and trails. In 2008, a visitor survey revealed that nearly 9 out of 10 regional parks and trail users were Caucasian.
36	21	Equity	Commend the Council for its extensive research on the needs of our increasingly diverse communities. If we truly value inclusiveness and diversity in our Twin Cities, then I believe our parks system needs to reflect these values.	Comment noted.
37	128	Equity	Parks ambassador program is good and will broker good relationships.	Comment noted.
38	128	Equity	Support plan, but encourage stronger language related to equity.	The equity-related language in the 2040 Regional Parks Policy Plan is framed within the context of the Council's authority.
39	135	Equity	Unfamiliarity with parks prevents people from participating.	Comment noted. Council research has also confirmed lack of awareness to be the top key barrier to regional park use.
40	135	Equity	Racial equity policies in the Plan are not a "single-issue".	The Council agrees with this statement.

Line ID	Comment ID	Theme	Comment	Response
41	135	Equity	Naming racial equity as a goal is important, but need some teeth. Parks and Trails Legacy Fund is incredibly important. Not just lip service, but putting your money where your mouth is.	Comment noted. The 2040 Regional Parks Policy Plan includes many key strategies related to funding and investment geared toward enhancing equitable use.
42	6	Equity	Adoption of the Plan should not occur until the Plan is complete and defines the "equity lens" and describes the specifics of the "equity toolkit" so the process and policy direction are more transparent and the policy direction is clear. Without details and definition of the equity lens and equity toolkit, it is not possible to identify impacts or evaluate how the Plan affects those governed by it.	The policy plan process began with the development of Thrive MSP 2040, which included extensive public engagement over the course of two years. Thrive provided significant input to the regional parks planning process. The 2040 Regional Parks Policy Plan was developed in 2014 over the course of several Metropolitan Parks and Open Space Commission meetings. The Council lengthened the 2040 Regional Parks Policy Plan adoption process to provide more time for discussion. The Council is committed to continuing to work with regional park implementing agencies and other stakeholders in 2015 to discuss and develop remaining policy implementation details, including the Regional Parks Equity Toolkit.
43	6	Equity	Pg. 83 states "Require regional park implementing agencies to complete a Regional Parks System equity toolkit in grant applications." In this section it states that the toolkit will not be used for screening purposes to determine eligibility of funding. This appears to be in conflict with the previous statement, "the equity toolkit will be used in the prioritization of projects proposed for funding."	Additional clarity has been added to this section. The language in the 2040 Regional Park Policy Plan specifies that the Metropolitan Parks and Open Space Commission and the Council will evaluate the project lists using the Regional Parks System equity toolkit. It also specifies that the Metropolitan Parks and Open Space Commission and the Council will discuss and evaluate the proposed projects based on the benefit a particular project may provide to all the region's residents, the needs and preferences of specific underserved populations, and the unintended consequences of the project. On rare occasions, based on the Council's evaluation, the Council may elect to recommend shifting the order of the prioritized list.

Line ID	Comment ID	Theme	Comment	Response
44	90	Equity	Support Finance - Strategy 5: Where appropriate, equity will be a consideration in Regional Parks System funding and investment.	Comment noted.
45	28	Equity	Support the Plan, in particular equitable programming, design and access	Comment noted.
46	28	Equity	Understand the process in place to ensure organizations are held accountable for Legacy Funds. Concerned that regional park agencies are not held accountable for they spend the funds. Park equity plays a vital role to ensure that these funds remain available in the future.	Comment noted.
47	71	Equity	Park agencies have a responsibility to the Council, and to the people of Minnesota, to develop projects which serve our diversifying population.	The Council agrees with this statement.
48	71	Equity	Equity should be a lens through which projects are weighed for their potential effectiveness and agencies will need to develop this lens as they move forward with developing our park system	A weighting system is not appropriate for Council's Regional Parks System funding streams, given parameters outlined in state statute (See p. 24 in policy plan). The Council will work with all the regional park implementing agencies to ensure that the Regional Parks Equity Toolkit is a meaningful tool to guide their decision making.
49	71	Equity	Agencies developing regional scale projects need to be held accountable to ensure that project development maintains a regional focus--equity is a crucial facet to this regional focus and is an issue that needs to be addressed within our regional system	The Council agrees with this statement.
50	71	Equity	Focus group research illustrates that there are issues within the regional parks system that need to be addressed. This work brought forward the voice of an underserved constituency in major policy decisions. Hopefully opposition to the draft Plan will recognize the merits of this body of work.	Comment noted.
51	69	Equity	Strongly support the equity policy recommendations in the Plan	Comment noted.

Line ID	Comment ID	Theme	Comment	Response
52	129	Equity	Our group has organized a triathlon (run, bike, canoe) at the Minneapolis Chain of Lakes Regional Park for Native women and children. A lot of these people have never been in a canoe. Goal is to expose people to the outdoors and motivate for continued use. Challenge has been in	The proposed Council funded parks ambassador program is intended to help address concerns such as these.
53	129	Equity	Getting permits to use the Minneapolis Chain of Lakes Regional Park or parkways was challenging--they felt like they had to know someone who knows someone. For grass roots efforts of local community members, they might not feel welcome and know who to contact	The proposed Council funded parks ambassador program is intended to help address concerns such as these.
54	129	Equity	Would like information on how to use regional parks, programs and resources. Their group is the entryway for a lot of people who don't feel part of these spaces; they provide the opportunity to get more Native women and families into parks.	The Council looks forward to working with your organization to ensure the information desired is in a preferred format.
55	138	Equity	There is a lack of culturally relevant programs.	The Council is not responsible for programming within the Regional Parks System. The Council will share these concerns with the regional park implementing agencies, who are responsible for all programming within the Regional Parks System.
56	138	Equity	Invitation for committee members to come to their community and have a conversation about why there is a lack of Native people in the regional parks.	Suggestion noted.
57	130	Equity	Concerned about equitable distribution of amenities between jurisdictions. All people pay taxes, but don't have equitable access.	The amount of money each regional park implementing agency receives is, in most cases, allocated by a formula specified in state statute (See overview on page 24 of the policy plan).
58	130	Equity	Suggest increased awareness of outreach, excursions led by parks staff and translations on park signage.	Suggestions noted and language in plan reinforces these suggestions.
59	124	Equity	Concerned that the equity policy recommendations in the Plan are being threatened	Comment noted.
60	69, 124	Equity	While general funds are being spent by park agencies on equity, parks are still described as unwelcoming spaces to communities of color.	The Council will share these concerns with the regional park implementing agencies.

Line ID	Comment ID	Theme	Comment	Response
61	69, 124	Equity	The programs presented in regional parks do not reflect the changing populations and diverse demographics	The Council is not responsible for programming within the Regional Parks System. The Council will share these concerns with the regional park implementing agencies, whom are responsible for all programming within the Regional Parks System.
62	124	Equity	There is a need for an equity analysis. The taxpayers pay for the regional parks and underrepresented communities are the true experts on what works for them. In addition to the expertise of the park agencies, the expertise of those most impacted must be included.	The 2040 Regional Parks Policy Plan calls for extensive engagement in the development and implementation of the equity-related policies. The Council has a strong commitment to ensuring the community is authentically involved in the decision making process.
63	124	Equity	A key indicator of equity is accessibility and being open to all; right now that is not the case. Equity exists when all people have access to opportunities and outcomes. These disparities that we face hurt us all--right now we have the opportunity to not just close the gaps but to institutionalize racial equity, producing transformative systems that benefit all. The policies presented here aim to strengthen equitable use of the park system, to remove barriers and obstacles that have been created, maintained or reinforced.	The Council agrees with this statement.
64	69, 124	Equity	Concerned about pushback from some of the park agencies could silence the voice of community members. These policy recommendations rose from extensive community engagement that should be honored.	Comment noted.
65	124	Equity	While snowboarding, skiing and maple syrup tapping are vital to engaging some; it is not reflective of programming that meets the needs of all. Part of equity is engaging community in the process. We have an opportunity to not only listen to the community but engage them in the implementation of an equitable park system.	Similar to the commitment illustrated in the development of the 2040 Regional Parks Policy Plan, the Council looks forward to engaging the community to assist implementation of the policy plan.



Line ID	Comment ID	Theme	Comment	Response
66	124	Equity	To say the Met Council, as a non-elected board is overstepping their boundaries and attempting a power grab is misleading. If we did not have the strong leadership from the Council, we would have no chance to address disparities. As I see it, the Council is simply trying to enforce its responsibility to the residents of this region.	Comment noted.
67	124	Equity	Equity will not happen by itself; it requires a change in business as usual. In order to achieve equity we have to try new things in order to get new outcomes.	The 2040 Regional Parks Policy Plan puts forward many new proposals in an effort to achieve new outcomes. The Council is committed to ongoing assessment and dialog.
68	69, 124	Equity	This Plan is about mitigating existing disparities and planning for equity centuries into the future.	The Council agrees with this statement.
69	78	Equity	Support the commitment in the Plan to include equity as one of five Thrive outcomes. This direction is consistent with our organization's goal: "everyone has access to quality parks, trails and other natural spaces to play, gather, and inspire within a 10 minute walk from home."	Comment noted.
70	78	Equity	Encourage the Council to commit to putting equity into practice across the full range of its regional park and trail policies.	The Council agrees with this statement. The 2040 Regional Parks Policy Plan articulates equity-related policies that are within our statutory authority and responsibility (See page 24 in the plan for overview).
71	78	Equity	Support the 8 actions listed on pages 62-63.	Comment noted.
72	17, 18, 69	Equity	Parks should be for everyone.	The Council agrees with this statement.
73	18, 69	Equity	Investment in equity requires a focus on outcomes, including standards of accountability to ensure communities of color will have equitable access to parks and resources.	The Council agrees with this statement. The suggestions will be brought forward during the development of the Regional Parks Equity Toolkit, to be developed in close collaboration with regional park implementing agencies, partners, and stakeholders in 2015.

Line ID	Comment ID	Theme	Comment	Response
74	69	Equity	Creating equity includes intentionally incorporating communities of color in the decision making process.	The Council agrees with this statement. The 2040 Regional Parks Policy Plan articulates a firm commitment to engagement throughout all phases of the plan including implementation, post adoption.
75	10	Equity	The 25 Year Parks and Trail Legacy Plan supports the aspirations of the 2040 Regional Parks Policy Plan, including taking explicit measures to at connecting and engaging populations who have been underrepresented in outdoor activities and who represent 74-100% of the population increase in the metro area.	Comment noted. The Council is committed to ensuring Park and Trail Legacy dollars are spent in the manner they were intended.
76	10	Equity	Some people have identified the interests around equity and the people talking about it as single-issue equity advocates or activists. This is an issue for those of us thinking about future generations and not just a single issue hot button trend, but a plan for the future. I am proud to say that the Met Council has been taking this leadership amidst a lot of challenges and apprehension. Change isn't easy, but it does need to happen sometimes.	Comment noted.
77	100	Equity	In terms of addressing the equity issue, the grants and reprioritizing local projects through the equity toolkit lens are important steps.	Comment noted.
78	136	Equity	Three Rivers has been talking a lot about equity, they have made their parks free for all to attend, which resulted in a significant rise in visitors.	Comment noted.
79	25, 133	Equity	Our organization embraces equitable usage and has made equity a top priority, but feels there's room to improve.	The Council looks forward to working with regional park implementing agencies to address equity and assist one another to improve equitable outcomes.

Line ID	Comment ID	Theme	Comment	Response
80	103	Equity	Encourage the Council to conduct targeted studies to understand more specifically the needs and preferences of underserved populations before providing solutions. The 2040 Regional Parks Policy Plan would be more effective if it provided more specific ways that equitable use could be increased, rather than broad brush assessments of what would make parks more equitable.	The Council conducted a comprehensive study prior to plan development. The study explored the preferences among people of color throughout the region. The information gathered helped to inform many of the strategies identified in the 2040 Regional Parks Policy Plan. Several strategies are very specific within the plan. For instance, the plan specifies the type of amenities that would appeal to a broader array of diverse users.
81	103	Equity	Parks have historically been a place for families and community to gather and are still being used for this purpose. Regional parks bring people together from diverse races, ethnicities, classes, ages, abilities and immigrant statuses. Since creating ways to make parks welcoming is a consideration in all capital development projects, it would be difficult to differentiate between capital projects that are being done to enhance equitable usage and what is a "regular" project.	The Regional Park Equity Toolkit and the Park Equity Grant program criteria (both to be developed in 2015) will assist regional park implementing agencies to speak to how their projects will enhance equitable usage.
82	90	Equity	Support establishing a Park Equity grant program.	Comment noted.
83	90	Equity	Support using equity as a funding prioritization criteria.	Comment noted.
84	90	Equity	Support requiring regional park implementing agencies to incorporate a diverse community engagement process.	Comment noted.
85	90	Equity	Council should consider providing further detail on how the regional park implementing agencies can act to remove or reduce barriers (safety concerns, cost, transportation and lack of information about programming and facilities) that prevent use of the regional system (pg. 61).	The 2014 Council report, entitled Regional Park Use Among Select Communities of Color, provides detailed information, derived from focus group participants that speak directly to how to remove or reduce barriers. <a href="#">Click here to access the report.</a>
86	90	Equity	Support Recreation Activities and Facilities - Strategy 3: Strengthen equitable usage of regional parks and trails among all residents, across race, ethnicity, income, and ability.	Comment noted.

Line ID	Comment ID	Theme	Comment	Response
87	90	Equity	Encourage Council to consider strategies to ensure that regional park facilities are more evenly distributed throughout the region to improve access to underrepresented groups and residents that are dependent on public transportation.	Service area analysis indicates that the current Regional Parks System serves the region quite extensively and, in some cases, regional parks and trails have overlapping service areas. The 2040 Regional Parks Policy Plan acknowledges the role of multimodal transportation and includes a commitment to collaborate with Metro Transit or local transportation providers to explore the feasibility of several initiatives, including: a) promoting a transit day pass or family pass to regional parks, b) providing free rides to large special events in regional parks, and c) adding transit stops that are convenient to regional parks and trails.
88	134	Equity	Suggest the Council develop an advisory panel to discuss Native aspects of how they use parks	The Council is prepared to engage in work in 2015 to enhance and ensure the inclusion of the Native community in Regional Parks System decision making.
89	134	Equity	Suggest a program working with Native youth that are at risk or coming out of incarceration to connect them to nature, such as jobs removing buckthorn	Suggestion noted. The Council does not administer restoration projects within the regional parks system. The regional park implementing agencies are responsible for operations and maintenance of the Regional Parks System. As such, the suggestion will be passed onto them.
90	134	Equity	Suggested a Native voice on the panel in the future	The Council is prepared to engage in work in 2015 to enhance and ensure the inclusion of the Native community in Regional Parks System decision making.
91	78	Equity	Support all four directives on page 8, and especially agree with and support the directive to strengthen equitable usage of regional parks and trails.	Comment noted.

Line ID	Comment ID	Theme	Comment	Response
92	78	Equity	Pleased that the Council sought feedback from communities of color as part of development of the Plan. This feedback is important and could be useful if continued in an ongoing manner. Our organization is happy to participate with the Council and the park implementing agencies to continue to collect park usage data and diverse users input to identify what is working well now and what can be improved to meet the goal of equitable usage of regional parks and trails.	Comment noted.
93	137	Equity	Looking for flexibility and agility in the 2040 Regional Parks Policy Plan. Give me the tools to reach out to underrepresented populations.	The 2040 Regional Parks Policy Plan indicates a strong commitment to provide assistance to regional park implementing agencies to engage diverse communities (see p. 66).
94	137	Equity	The Met Council should take the lead on regional awareness information campaign with a unified message promoting parks to all people.	Comment noted. The 2040 Regional Parks Policy Plan states a commitment to create a parks ambassador program, which aims to increase awareness of the Regional Parks System. The ambassador program would be initiated post plan adoption.
95	103	Equity	Pg. 83 of the 2040 Regional Parks Policy Plan states that the method of prioritizing projects is the "Regional Parks System equity toolkit", but the toolkit won't be defined until 2015. There is no discussion on how or when projects will be prioritized. We request that the toolkit be fully discussed and determined before being presented as a strategy in the 2040 Regional Parks Policy Plan.	Clarity has been added to this section. The equity lens and equity toolkit will be developed in 2015. Dates for it's use have been added to the policy plan. The Council is committed to continuing to work with regional park implementing agencies and other stakeholders in 2015 to discuss and develop the remaining policy implementation details.
96	102	Equity	We agree that it is imperative that all residents have the opportunity to enjoy the bountiful resources that the regional parks system provides.	Comment noted.
97	102	Equity	We endorse the principle that facilities and programs should be designed to increase use of the Regional Parks System by all residents of the region, irrespective of race, ethnicity, income and ability.	Comment noted.

Line ID	Comment ID	Theme	Comment	Response
98	102	Equity	We endorse the principle that to the extent feasible, park agencies should provide physically challenged participants with similar park/trail experiences through adaptive programs and facilities.	Comment noted.
99	102	Equity	Recommend that the Council move from a policy that create a minimum allocation of funding for "equity" projects to a collaborative model that creates investments based on: a solid research-based needs analysis of barriers to equitable participation in regional parks usage; an examination of national best practices of proven equity strategies in other major metropolitan park systems; identification of the breadth of equity programs and services currently underway by park agencies from all funding sources; and creation by the Council of a demonstrable system for measuring and evaluating outcomes from equity investments in the regional system. We would prefer to work collaboratively with the Council on common equity goals versus Council imposed directives.	Council research was conducted in 2013-2014 to better understand barriers to park use. The findings of those efforts informed the development of the 2040 Regional Parks Policy Plan. Information is not available in terms of best practices of proven equity strategies from other major metropolitan park districts. The Council looks forward to continuing to work with regional park implementing agencies and other stakeholders in 2015 to discuss and develop remaining policy implementation details.
100	102	Equity	The Council should use other funding sources or finance capacity to establish and sustain a new equity grant program. If the Council is serious about this initiative, it should be deployed with alternative funds that could potentially leverage matching state funds.	The Council seeks to dedicate a portion of their park bonds towards capital projects that seek to enhance equitable use.
101	102	Equity	Investments in the equity grant program need to have demonstrable benefits and measurable outcomes.	Suggestions noted. The Park Equity Grant Program criteria and evaluation process will be determined in 2015.
102	102	Equity	The distribution of equity grants dollars should be based on existing formulas and not be of a competitive nature.	The Council seeks to allocate these funds in a competitive manner, given the amount of funds available.

Line ID	Comment ID	Theme	Comment	Response
103	102	Equity	The 2040 Regional Parks Policy Plan suggests that the Council and MPOSC should be involved in determining the priority of projects submitted by implementing agencies using a yet to be established equity toolkit. We strongly object to the Council making funding decisions on the prioritization of projects submitted by the agencies. The Council does not currently prioritize capital requests as these decisions are made by the local implementing agencies based on: project phasing, leveraging outside dollars, master plan priorities, development needs, and other considerations. Our partnership recognizes that implementing agencies and elected officials are accountable to their electorate, and therefore in the best position to judge the priority needs at a local level.	The Council values the partnership with the regional park implementing agencies and seeks to strengthen the relationship through their involvement in discussions related to the how state and Council funds will be spent within the Regional Parks System. Currently, the process does not include the Council nor it's advisory body, the Metropolitan Parks and Open Space Commission. As both a funder and fiscal agent, it is the Council's responsibility to ensure funds are spent in a manner that is consistent with state statute and the Regional Parks Policy Plan.
104	110	Equity	Page 62: The lack of awareness is telling and we are interested in learning more about this survey. Are the park s located near or accessible to communities of color?	The 2014 Council report, entitled Regional Park Use Among Select Communities of Color, provides detailed information, derived from focus group participants that speak directly to how to remove or reduce barriers. <a href="#">Click here to access the report.</a>
105	11	Equity	We urge the Council to complete the development of the equity lens and equity toolkit in collaboration with implementing agencies before adopting the 2040 Regional Parks Policy Plan.	The Council will collaborate with regional park implementing agencies, partners, and other stakeholders to develop the Regional Parks Equity Toolkit in 2015.

Line ID	Comment ID	Theme	Comment	Response
106	11	Equity	With regard to the equity lens and toolkit, we request the Council and implementing agencies: a) clearly define how it will consider equity when prioritizing projects and evaluating funding requests; b) clearly define how impacts of projects on equity will be measured; c) balance evaluation of equity impacts with other stated goals of the regional parks system, including the major considerations outlined on page 66, the state priority to acquire additional public water frontage on page 68, and legislative mandates to "acquire, preserve, protect and develop regional recreation open space for public use"; and d) allow efforts to promote equitable park usage to be tailored to specific locations based on proximity to target populations and differences in the needs and desires of local populations within the park's primary service area.	Clarity related to prioritization of projects has been added to Finance- Strategy 5. With regards to the other stated goals on page 66 and 68, those goals are related to siting and acquisition of new regional park and trails, not existing regional parks and trails. In terms of tailoring efforts to promote equitable park usage to specific locations, Council research has found similarity throughout the region in terms of both the barriers encountered and the recommendations to enhance regional park and trail use. Differences that did emerge had more to do with race, ethnicity, and cultural background than specific geographical location in the region.
107	11	Equity	Council should invest in thoroughly understanding barriers to equitable park use before deploying solutions. Capital projects are costly and have long lifespans and the region should be highly confident that capital projects will produce intended results before investing scarce capital dollars.	Council conducted extensive research to understand barriers to equitable park use in 2013-2014. A report produced from that work is available on the Council's website. See line 104 above for the link.
108	11	Equity	The 2040 Regional Parks Policy Plan does not clearly explain how progress toward equitable use goals will be evaluated and how implementing agencies are accountable toward these goals. We suggest that so long as an implementing agency is making a good faith effort to provide facilities and programs that appeal to the region's population, implementing agencies should not face funding consequences based on participation of minority populations.	The Council does not view the strategies outlined in the 2040 Regional Parks Policy Plan as "funding consequences", but rather serve to facilitate a mutual aim to improve the services provided to everyone in the region.



Line ID	Comment ID	Theme	Comment	Response
109	11	Equity	We request that the Council to clarify how equitable park use will be measured. Specifically, will use be measured by individual facility, implementing agency, or at a regional scale?	Visitor data is collected at every Regional Parks System unit. However, a representative sample at each unit is cost prohibitive. Data collected, therefore, can be evaluated at the implementing agency level and at the Regional Parks System level.
110	11	Equity	We request that the Council take a more active role in marketing regional parks and regional park programs to minority populations and provide financial support for implementing agencies to advertise facilities in collaboration with each other for programs and facilities which attract primary users beyond the implementing agencies' geographic jurisdiction.	The 2040 Regional Parks Policy Plan states a commitment to create an ambassador program, which aims to increase awareness of the Regional Parks System. The ambassador program would be initiated post plan adoption.
111	26	Equity	We applaud the Council for its focus on equity and look forward to working with the Council, MPOSC, and stakeholders to strengthen equitable usage of the regional parks and trails system by all of the region's residents. This direction is consistent with our comprehensive plan, which sets the goal of increasing premier park and recreation features in north and northeast Minneapolis. It also focuses on tailoring park and recreation programs, services, and facilities to meet the ever changing and increasingly diverse park and recreation needs of the community.	Comment noted.

Line ID	Comment ID	Theme	Comment	Response
112	26	Equity	We urge the Council to take a broader look at equity. We recommend that equity be considered in all master plans and funding requests. Currently, equity is listed as a design consideration for master plan development. We recommend addressing equity more like accessibility and have it be a required element of master plans. The equity toolkit described in Finance Strategy 5 could be used in the master plan process as well. Since the Council finances projects that are approved in master plans, applying the equity toolkit to master plan development will ensure that subsequent funding requests will be consistent with Council's goals and directives related to equity.	The Council supports the Regional Park Equity Toolkit being used in all aspects of park acquisition, planning, development, and operations. Elements of a traditional equity toolkit have already been integrated in to the master plan requirements section. These elements include not only the design considerations, but also incorporate stronger language related to the community engagement process, which "must seek to mitigate existing racial, ethnic, cultural or linguistic barriers and include people of diverse races, ethnicities, classes, ages, abilities and national origin" (p. 77 and 78).
113	26	Equity	We support the Council's intention to conduct additional studies that will inform the planning and management of the regional parks system, especially targeted studies to better understand the needs of and preference across social classes, age, racial and ethnic groups, educational backgrounds and abilities. We recommend that this target research include some statistically valid methods. This will be especially helpful to each implementing agency as it prioritizes its funding request and improvements.	Comment noted. The Council is committed to continued research efforts. Related to types of desired future studies, it is unclear what is meant by "statistically valid methods". In science and statistics, validity is multifold. There is construct, content, criterion, experimental, internal, external, and diagnostic validity. That said, the Council employs sound methodology to their research endeavors, selecting the method(s) appropriate to the research question.
114	25	Equity	We strongly support equitable use of the regional parks and we recognize that there is always room for improvement.	Comment noted.
115	25	Equity	Three years ago the City began to undertake advanced racial equity work throughout the City and we are committed to and supportive of any efforts to help reduce racial disparities.	Comment noted.

Line ID	Comment ID	Theme	Comment	Response
116	25	Equity	We highly value the importance of racial equity work; however, for this work to be effective and meaningful there needs to be due diligence done prior to implementation, including metrics and methods of data collection. The significant policy changes in this plan rely too much on work yet to be done.	The policy plan process began with the development of Thrive MSP 2040, which included extensive public engagement over the course of two years. Thrive provided significant input to the regional parks planning process. The 2040 Regional Parks Policy Plan was developed in 2014 over the course of several Metropolitan Parks and Open Space Commission meetings. The Council lengthened the 2040 Regional Parks Policy Plan adoption process to provide more time for discussion. The Council is committed to continuing to work with regional park implementing agencies and other stakeholders in 2015 to discuss and develop remaining policy implementation details.
117	34	Equity	We fully support the Council's efforts to use an equity lens in the planning of regional parks to help ensure equal opportunity across the region. Using an equity lens in this context will complement our racial equity efforts as we work to bring equity to all services the City provides, including parks and recreation, capital projects, programs and events, to name a few.	Comment noted.
118	34	Equity	In order to measure progress, a baseline of accurate data, achievable goals and flexibility in the type and location of new facilities will greatly help in achieving equity goals.	A baseline was collected in 2008, when a comprehensive visitor survey was conducted. The 2040 Regional Parks Policy Plan expresses a commitment to conduct visitor surveys in the Regional Parks System every five years. This will enable monitoring of progress to strengthen equitable usage of regional parks and trails.

Line ID	Comment ID	Theme	Comment	Response
119	8	Equity	Thrive 2040's outcomes of Stewardship, Prosperity, Equity, Livability, and Sustainability reflect what we do every day as an Implementing Agency for the Regional Park System. Our stewardship work protects, enhances, and restores some of the best habitat in the region; we add to region's prosperity by helping to create places where people want to live, work and play; we help develop safe, healthy, and livable communities; we protect special places for the future; and we constantly work to provide places for all residents to enjoy.	Comment noted.
120	8	Equity	Convening and Information (multiple objectives). This is really where we think the Council can help us thrive by being a leader in this effort. The Council should commit the resources to accomplish these objectives effectively. To date, it appears that most of the convening has focused on the urban core, and specifically Racially Concentrated Areas of Poverty (RCAP). The Council must acknowledge that convening and information throughout the region will be the only way to truly achieve equity.	The 2040 Regional Parks Policy Plan articulates a strong commitment to convening regional park implementing agencies, other partners, and stakeholders. To develop the policy plan, engagement took place in a variety of ways throughout the metropolitan region. The Council did not solely focus on the urban core in these efforts.
121	7	Equity	The Regional Parks Policy Plan fails to recognize and balance equity needs across the region. We recommend that the Council acknowledge that there are equity needs outside of the urban core.	The policy plan does not specifically target any of the equity-related policies to any geographic location. The goal of strengthening equitable usage of regional parks and trails will be a region-wide effort.
122	86	Equity	Our concerns are not about equity; the new policy is not a change for us. We have been, and will continue to be, a leader in providing equitable service for all residents.	Comment noted.
123	86	Equity	We have long been committed to service equity, and we welcome the Council's new emphasis on this important concept of fundamental fairness.	Comment noted.

Line ID	Comment ID	Theme	Comment	Response
124	86	Equity	It is eminently reasonable that such ambiguous concepts as the "equity toolkit," which will be used to prioritize future project funding, should be clearly defined before any decisions are made to significantly shift decision-making authority away from long established funding structures.	The Council is statutorily responsible for prioritizing funds for acquisition and development (MS 473.147, Subd. 1). The "equity toolkit" in reference will be developed with extensive stakeholder involvement and approved by the Council before it is used to facilitate discussion of proposed regional park and trail projects.
125	7	Equity	The 2040 Regional Parks Policy Plan proposes using a Regional Parks System equity toolkit for prioritization of capital projects. As described, this toolkit will prescribe and direct the use of an IA's funds.	The Council hopes the Regional Parks System Equity Toolkit serves an important function in regional park implementing agency investment decision making.
126	7	Equity	The Regional Parks Policy Plan fails to recognize and balance the equity needs across the region.	The 2040 Regional Parks Policy Plan does not target the equity-related policies to any specific geographical area. The aim it to strengthen equitable usage of regional parks and trails throughout the metropolitan region.
127	7	Equity	We agree with the policy and strategy to strengthen equitable usage of regional parks and trails among all residents, across race, ethnicity, income and ability. While the draft Regional Parks Policy Plan does not reference racially concentrated areas of poverty (RCAPs), these areas were the focus of the equity discussion at several Metropolitan Parks and Open Space Committee (MPOSC) meetings referencing the unmet recreation needs in the urban core. The urban core and associated RCAPs have the greatest access to existing regional parks. The focus on RCAPs fails to recognize the growth of people of color and poverty across the region and their recreation needs.	The 2040 Regional Parks Policy Plan makes no explicit mention of racially concentrated areas of poverty (RCAPs). The policy plan does not target the equity-related polices to any specific geographic area. The aim is to strengthen equitable usage of regional parks and trails throughout the metropolitan region.

Line ID	Comment ID	Theme	Comment	Response
128	7	Equity	Counties are truly Minnesota's subject matter experts when it comes to addressing poverty, and the causes of poverty. But these policy plans demonstrate no recognition of this experience and proficiency. Additionally, the Regional Parks Policy Plan contains no data demonstrating the effectiveness of the included strategies.	The 2040 Regional Parks Policy Plan does not include any language that specifically speaks to poverty. No data is available as of yet to demonstrate the effectiveness of the newly proposed strategies, given the Council has yet to implement them. The Council did, however, conduct rigorous study to explore mechanisms that would be most beneficial to address issues of equitable usage and used those findings to assist the development of plan strategies.
129	7	Equity	The 2040 Regional Parks Policy Plan needs to have an action item that specifically works towards increasing awareness of the regional park system by underrepresented populations. The Regional Parks Policy Plan should add the following language: The Metropolitan Council will prepare a public outreach and feedback plan to increase regional awareness and establish strategies to increase use by underrepresented markets and populations.	The 2040 Regional Parks Policy Plan, with its emphasis on equitable usage, includes explicit strategies to increase use by underrepresented markets and populations. The strategies were formulated based upon extensive public engagement and research. Several strategies specified in the plan specifically aim to increase awareness. These efforts include creating a regional park ambassador program with the explicit purpose of enhancing awareness of the Regional Parks System.
130	7	Equity	(Page 62-63) The predominant barriers to equitable use, as stated in the Regional Parks Policy Plan, are awareness, safety, language barriers and weather. These barriers reflect operational, not capital, budget needs. The use of operation and maintenance (O&M) funding, not capital improvement plan (CIP) funding or Parks and Trails Legacy funding, as recommended in the draft plan, is best suited to address needs across the system.	The Council research study cited also asked participants to identify recommendations to enhance use of regional parks and trails. The third most common recommendation across all participants was to enhance the capacity of gathering spaces. As such, there are potential capital expenditures that participants noted would have a direct benefit to equitable use.
131	7	Equity	(Page 62-63) Using the existing funding structure to promote equitable usage would compromise other needs within the regional park system. Any new set-aside grant program should be funded with new dollars; only after all other capital and operational funding obligations are met.	The Regional Parks Equity Grant program would be funded with Council bonds. Funds available for that program would be determined based upon meeting other funding obligations.

Line ID	Comment ID	Theme	Comment	Response
132	8	Equity	We do not argue that equitable use of the regional park system is one of our greater challenges, and we support the broad vision of enhancing equitable use of the system. However, the ultimate outcome of this process is not clearly defined in the 2040 Regional Parks Policy Plan. For example, what level of equity is our goal? Are we only focusing on the Racially Concentrated Areas of Poverty (RCAP)? How have we engaged diverse populations who live outside the urban core? Is the Council willing to commit new funding toward this effort, or will there be a transfer of existing resources? While much of the Plan has specific goals or outcomes identified (e.g. regional park and regional trail search areas), equity outcomes throughout the plan are vague.	The 2040 Regional Parks Policy Plan specifies the aim to strengthen equitable usage of regional parks and trails, across age, race, ethnicity, income, ability , and national origin. The plan makes no mention of Racially Concentrated Areas of Poverty. The Council engaged stakeholders throughout the region during plan development. The plan puts forward the creation of a new competitive grant program for capital projects that aim to strengthen equitable use. The grant program will be funded with Council bonds. Language has been added to the plan to clarify the primary objectives of the equity-related strategies.
133	8	Equity	The Council has an opportunity to be a leader in enhancing use of the regional park system by all residents, and we would hope that the Council facilitates a process where the Council works collaboratively with the Implementing Agencies to define and achieve common equity goals throughout the region, rather than the Council imposing new rules and regulations in an attempt to achieve a yet-to-be-determined equity outcome for the urban core. We strongly encourage the Council to clarify the broad equity statements found throughout the Plan with more specificity.	Clarity has been added to this section. The Council seeks to strengthen equitable use of regional parks and trails throughout the region.
134	7	Equity	We generally support the following from Chapter 4: regional park implementing agencies should act to remove or reduce barriers to prevent use.	Comment noted.
135	7	Equity	We generally support the following from Chapter 4: all new projects and master plans should include ADA review, providing physically challenged visitors with comparable park and trail experiences.	Comment noted.

Line ID	Comment ID	Theme	Comment	Response
136	7	Equity	We generally support the following from Chapter 4: the Council should conduct a visitor survey every 5 years, create an ambassador program and convene stakeholder meetings to increase awareness, educate and promote equitable usage.	Comment noted.
137	110	Funding	Page 26: "Federal and state agencies are encouraged, but not required, to submit master plans for recreational open space units within the seven-county region to the Council for its review ...However, the Council does not grant regional funds to state or federal agencies for capital improvements or for operations and maintenance of these facilities. Figure 3-1 depicts the national, federal and state recreation lands in the region." This statement needs clarification. The map on page 26 shows the boundary of MNRRA, which includes the entire Mississippi riverfront in the region. The riverfront in Minneapolis is also part of the regional park system (Mississippi Gorge, Central Mississippi, Upper Mississippi, etc.) and is certainly supported through regional park funds in the development of parks, trails, and parkways. While these funds don't go to the state and federal entities, they benefit some of the same geography; that should be clarified in the language of the plan.	Clarity has been added to this section.
138	110	Funding	Page 92: "The Council will consider funding soil contamination cleanup..." Is this specifically regarding regional parks funds? There are other Council funded brownfields cleanup programs, typically targeting private development, that are occasionally used by parks.	Clarity has been added to this section.



Line ID	Comment ID	Theme	Comment	Response
139	110	Funding	<p>Page 97: It is appropriate that the agencies have a major role in determining how funds are used. However, it might be helpful if there was a regional assessment in terms of overall need for parks funding based on expected population and employment growth as well as operations and maintenance of new and existing facilities. An assessment of whether the funding sources identified are adequate to meet identified needs is also recommended.</p>	<p>Suggestion noted. Council population forecasts for each jurisdiction were not available at the time of plan development.</p>
140	110	Funding	<p>Page 104: Concerning the passage, "The aggregate cost of acquiring the land and remediation does not exceed the certified appraised value of the land at the time of purchase. The certification of the market value of the property will be based on a third-party field review of the appraisal. The appraisal review must determine that the appraisal followed USPAP. The appraisal review must be submitted to the Council." This standard needs to be more flexible. A site may be heavily contaminated (to the extent the cleanup cost exceeds reasonable market value) and still be a tremendous asset to the regional park system. The value of parks can't just be captured in terms of market value - there are many less tangible benefits, as outlined throughout this document. At the very least, it should be reworded to cap funding for cleanup at the market value - rather than suggesting it's not worth the effort to clean up. While there are other funding sources, they typically require parks to compete against projects that generate property taxes, jobs, etc. - so they aren't always competitive by those programs' standards. There may also be an equity dimension to this, as contaminated sites are often in less advantaged areas of the region.</p>	<p>This policy directs the spending of Park Acquisition Opportunity Funds. This clause is specific to opportunities where land can be obtained at or below market value because the cost of remediation is less than what the purchase price would be if the land was not contaminated. It is not appropriate to use limited Park Acquisition Opportunity Funds for the costs of contaminated land cleanup above and beyond the market value of the property.</p>

Line ID	Comment ID	Theme	Comment	Response
141	110	Funding	Page 107: While this section accounts for the costs of building out the system, it is not clear whether or not existing funding sources are adequate to meet this need - or if new ones need to be identified. It also seems to lack data on the ongoing operations and maintenance costs associated with system build- out. Both of these should be clarified in the plan.	State statute (MS 473.147, subd. 1) specifies that the plan must estimate the cost for acquisition and development of the Regional Parks System. As such, the cost estimate only includes an estimate for those aspects, acquisition and development. Table 5-1 provides an overview of the Council's Capital Improvement Plan. The table provides an estimate of the investments the state and Council will make toward capital costs. Operations and maintenance funding provided to regional park implementing agencies can be found in Table 5-2. Clarification has been added to this section.
142	101	Funding	Pg. 16 Regional Park System Management Structure acknowledges the partnership between agencies and the Metropolitan Council. A stronger statement should be made cornering the I.A.'s role in providing operations and maintenance funding.	Additional language added to that section.
143	101	Funding	Pg. 82 We request that the Council cite the Statute which provides the authority for the Council to require implementing agencies to adhere to the determined minimum level of spending as it pertains to their annual share of the Parks and Trails Fund appropriation.	The Parks and Trails Legacy Plan identified 5-year priorities, of which half fell within the pillar of Connect People and the Outdoors. The Council, as the fiscal agent, is responsible to uphold the Parks and Trails Legacy Plan and ensure that the money is spent in a manner intended. On average, since fiscal year 2010, 3% or less of Parks and Trails Legacy dollars have been spent to Connect People and the Outdoors.
144	101	Funding	Table 5-1 provides a summary of the six-year parks capital improvement plan funding sources and expenditures. Supporting text should be provided to explain where the dollar amounts come from and, show current funding needs to implement master planned projects vs. the amount of anticipated funding, and propose strategies to address funding gaps.	Additional language has been added to that section of the plan to identify funding sources. Table 5-3 provides an estimate of how much funding is needed to implement acquisition and development of the system plan.

Line ID	Comment ID	Theme	Comment	Response
145	101	Funding	Pg. 99 states, "the Council will identify a minimum percentage of Parks and Trails Legacy appropriations that should be used to 'connect people and the outdoors'. Once determined and approved by the Council, the Council will require regional park implementing agencies to adhere to the determined minimum level of spending as it applies to their annual share of the Parks and Trails Fund appropriations." We request that the Council clarify how connection dollars will be distributed to the implementing agencies.	Clarity has been added to this section. Additional language has been added to indicate there will be no change to an agency's share of Parks and Trails Legacy dollars, given the formula is specified in MN statute 85.53.
146	9	Funding	The Met Council should not interfere nor control any funds allocated to Three Rivers Park District. Met Council involvement would add an unneeded layer of administration. Three Rivers Parks and programs are now well led, they see very high use, they are free to all, and use funds responsibly.	The Council, as both a fiscal agent and a funder, has a role and responsibility in ensuring state and regional dollars are spent in the manner intended. The authority is provided in state statute (see overview in 2040 Regional Parks Policy Plan on p. 24).
147	43	Funding	The Met Council is not in the best position to decide how funds for parks in Dakota County are allocated.	The Council, as both a fiscal agent and a funder, has a role and responsibility in ensuring state and regional dollars are spent in the manner intended. The authority is provided in state statute (see overview in 2040 Regional Parks Policy Plan on p. 24).
148	45, 46, 56, 57, 58, 60, 61, 62, 64, 67, 73, 74, 79, 80, 81, 82, 85, 87, 92, 93, 94	Funding	The Plan must include a requirement that 20% of Parks and Trails Legacy appropriations must be used to "Take Care of What We Have" for natural resources apart from development.	On average, 33% of Regional Parks System's Parks and Trails Legacy appropriations have been spent to "Take Care of What We Have". The Parks and Trails Legacy fund is intended to support parks and trails of Minnesota. The Parks and Trails Legacy Plan specifies that funds must be used across four distinct pillars. Each pillar has a subset of associated strategies. In sum, there are a total of 75 different strategies across the four pillars. The Council is not in the position to direct regional park implementing agencies to direct their spending to a small subset of strategies.

Line ID	Comment ID	Theme	Comment	Response
149	44, 48, 51, 66, 72	Funding	The Plan must include a requirement that 25% of Parks and Trails Legacy appropriations must be used to "Take Care of What We Have" for natural resources apart from development.	On average, 33% of Regional Parks System's Parks and Trails Legacy appropriations have been spent to "Take Care of What We Have". The Parks and Trails Legacy Plan specifies that funds must be used across four distinct pillars. Each pillar has a subset of associated strategies. In sum, there are a total of 75 different strategies across the four pillars. The Council is not in the position to direct regional park implementing agencies to direct their spending to a small subset of strategies.
150	49	Funding	The Plan must include a requirement that 30% or more of Parks and Trails Legacy appropriations must be used to "Take Care of What We Have" for natural resources apart from development.	On average, 33% of Regional Parks System's Parks and Trails Legacy appropriations have been spent to "Take Care of What We Have". The Parks and Trails Legacy Plan specifies that funds must be used across four distinct pillars. Each pillar has a subset of associated strategies. In sum, there are a total of 75 different strategies across the four pillars. The Council is not in the position to direct regional park implementing agencies to direct their spending to a small subset of strategies.
151	96	Funding	All Legacy Funds should be used for forestry or eco repair	On average, 33% of Regional Parks System's Parks and Trails Legacy appropriations have been spent to "Take Care of What We Have". The Parks and Trails Legacy Plan specifies that funds must be used across four distinct pillars. Each pillar has a subset of associated strategies. In sum, there are a total of 75 different strategies across the four pillars. The Council is not in the position to direct regional park implementing agencies to direct their spending to a small subset of strategies.

Line ID	Comment ID	Theme	Comment	Response
152	88	Funding	The Plan should include that a percentage of Parks and Trails Legacy appropriations be used to "Take Care of What We Have" for natural resources apart from development.	On average, 33% of Regional Parks System's Parks and Trails Legacy appropriations have been spent to "Take Care of What We Have". The Parks and Trails Legacy fund is intended to support parks and trails of Minnesota. The Parks and Trails Legacy Plan specifies that funds must be used across four distinct pillars. Each pillar has a subset of associated strategies. In sum, there are a total of 75 different strategies across the four pillars. The Council is not in the position to direct regional park implementing agencies to direct their spending to a small subset of strategies.
153	68	Funding	Funding is tilted toward development, while maintenance of existing resources is severely underfunded	The Council has grant programs in place (e.g., Capital Improvement Program and Park Acquisition Opportunity Fund) that are explicitly for acquisition and development. These grant programs account for a large portion of the investments the Council provides to help fund the Regional Parks System. These funds can only be used for those purposes.
154	63	Funding	The Plan should prescribe that a third or more of every dollar spent is devoted to removing invasive species.	On average, 33% of Regional Parks System's Parks and Trails Legacy appropriations have been spent to "Take Care of What We Have". The Parks and Trails Legacy fund is intended to support parks and trails of Minnesota. The Parks and Trails Legacy Plan specifies that funds must be used across four distinct pillars. Each pillar has a subset of associated strategies. In sum, there are a total of 75 different strategies across the four pillars. The Council is not in the position to direct regional park implementing agencies to direct their spending to a small subset of strategies.
155	71	Funding	It is within the scope of the Council's work, as fiscal agent for Legacy funding, to oversee how funds are used by recipients of these dollars.	The Council agrees with this statement.

Line ID	Comment ID	Theme	Comment	Response
156	99	Funding	The Plan ignores the obvious difference in spending between capital improvements and ecological stewardship.	The plan identifies the funding sources available. The funding streams described specify what types of expenditures are permitted. As the plan illustrates, several grant programs are explicitly for acquisition, development or redevelopment purposes only. The Council does not have any funding programs explicitly geared for ecological stewardship. However, the regional park implementing agencies can utilize their Parks and Trails Legacy Fund and Operations and Maintenance Fund allocations for such purposes.
157	124	Funding	Since funding from the Council comes from the 7 county region and the state, having a regional and local perspective is needed. An elected body is responsible to its constituents only, therefore measures and outcomes need to be in place to ensure that the funds will be spent in a way that benefits the region, not just the park agencies.	The Council agrees with this statement and looks forward to increased dialog with regional park agency partners as it pertains to how funds are spent. Outcomes and measurements will be developed and monitored post plan adoption.
158	78	Funding	Support the set-aside competitive park equity grant program	Comment noted.
159	93	Funding	Agree that a minimum percentage of Parks and Trails Legacy appropriations should be used to "Connect People and the Outdoors".	Comment noted.
160	83	Funding	We voted for the Legacy amendment to ensure adequate habitat and open space for wildlife. Restoration is more important to wildlife than trail development and should receive the majority of funding. Once habitat has been firmly established, then development can be considered.	Legacy funds are allocated across four domains: 1) Arts and Culture Heritage Fund, 2) Clean Water Fund, 3) Outdoor Heritage Fund, and 4) Parks and Trails Fund. The Council receives appropriations from the Parks and Trails Fund dollars, which are expressly for supporting parks and trails of Minnesota. The 25 year Legacy Plan articulates how the Park and Trail Legacy funds are intended to be used.

Line ID	Comment ID	Theme	Comment	Response
161	10	Funding	The Parks and Trails Legacy Advisory Committee took the time this summer to review and further define what the 25 Year Parks and Trails Legacy Plan means regarding "Connecting People and the Outdoors." The Advisory Committee defined "Connecting People and the Outdoors" to be projects that are non-capital items that attract new users and retain existing users. Currently less than 3% of Parks and Trails Legacy Funds are spent in the metro area to Connect People and the Outdoors. This is of concern to the Parks and Trails Legacy Advisory Committee.	Comment noted.
162	100	Funding	Current funding formulas seem to be designed to continue to skew the provision of facilities and access. Because these projects are generated by county, multi-county or city park agencies, how are holes in the system addressed? If an agency is in fiscal stress, they may not have recreation investment as a large priority and may not bring projects forward. Inequity develops and continues to develop because of how funding is prioritized.	Comment noted. The existing funding formulas are set in state statute. Each regional park implementing agency is allocated funds based on the formula. Each regional park implementing agency, therefore, puts forward projects that fall within the amount of their allocation.
163	136	Funding	Need a clear picture of what "Connecting People and the Outdoors" looks like--need more time to understand the measurement and what the outcomes are.	Please refer to the Parks and Trails Legacy Plan, available <a href="#">here</a> .
164	133	Funding	Concerned with provision that MPOSC and Met Council become involved in prioritizing projects. Impacts are unknown and may affect matching grants and leveraging of other funding sources.	Clarity and additional language has been added to this section. Language has been added to that section to reflect that priority will still be given to projects with matching grant funds.

Line ID	Comment ID	Theme	Comment	Response
165	103	Funding	Most of the items identified in the 2040 Regional Parks Policy Plan to enhance park use are not capital in nature. Request that the Council identify an additional non-capital funding source that would provide grants to more effectively meet the equity needs presented in the 2040 Regional Parks Policy Plan and would allow agencies to apply for non-capital items like programming equipment, event supplies, marketing materials, etc.	No other new funding sources are available to the Council at this time to provide for non-capital spending. The Council encourages regional park implementing agencies to utilize their share of Parks and Trails Legacy Fund and Operations and Maintenance Fund dollars for non-capital projects.
166	103	Funding	Since all of the strategic directions identified in the Parks and Trails Legacy Plan work to make the regional parks system more welcoming to all, we request that the discussion on determining a percentage of funds to be used only in the "Connect People and the Outdoors" category of Parks and Trails Legacy Plan (just one of 4 strategic directions) be discussed further prior to plan adoption.	Discussions with regional park implementing agencies transpired on November 14, 2014. Discussion included how the process of determining the minimum percentage would occur after the plan is adopted. The Council is committed to working with regional park implementing agencies and other stakeholders to discuss and implement the 2040 Regional Parks Policy Plan.
167	102	Funding	We support the four principal priorities for parks in the 25 Year Parks and Trails Legacy Plan. We do not agree that the Council should identify a minimum percentage of Legacy appropriations to be used to "Connect People and the Outdoor." This would create an arbitrary mandate on the use of funds that is not based on sound research and demonstrable outcomes related to equity access. It seems inconsistent to single out just one of the four priorities for a mandated funding level.	On average, since fiscal year 2010, 3% or less of Parks and Trails Legacy dollars have been spent to Connect People and the Outdoors. The Parks and Trails Legacy Plan identified 5-year priorities, of which half fell within the pillar of Connect People and the Outdoors. The Council, as the fiscal agent, is responsible to ensure that the money is spent in a manner intended.
168	102	Funding	All four of the funding categories from the 25 Year Parks and Trails Legacy Plan are interrelated and all of them contribute to access equity.	The Parks and Trails Legacy Plan does not specifically mention access equity, thus the Council cannot evaluate the comments merits. The only mention of equity in the Parks and Trails Legacy Plan is in relation to fund distribution.



Line ID	Comment ID	Theme	Comment	Response
169	102	Funding	There are a number of equity oriented programs and services being provided by the implementing agencies that are not funding through Legacy or CIP programs. These have not been discussed in the 2040 Regional Parks Policy Plan planning process. Unless all resources and efforts are being considered by the Council, an arbitrary percentage of equity funding from just one source places this policy directive further out of context with demonstrated need.	The Council values the efforts the regional park implementing agencies do to strengthen equitable usage of the Regional Parks System. The plans focus on Parks and Trails Legacy dollars is intended to ensure the money is being spent in the manner the residents of MN put forward. The Council is not involved with how regional park implementing agencies spend money outside of the investments they administer.
170	10	Funding	It would be a huge misstep for the Parks and Trail Legacy Advisory Committee, the Met Council, and the park implementing agencies if we fail to ensure that the basic and very clear expectation of the people of Minnesota in "Connecting People and the Outdoors" is missed in 20 years when it comes time for us to account for how we've spent these funds. It's important to say what we've done and who we've done it for.	The Council agrees with this statement.
171	102	Funding	Recommend that the Council stay with the current system of implementing agencies making their own determination of priorities in CIP and Legacy funding requests consistent with the current funding distribution formula. The Council should continue its coordinating role.	The Council, based on state statute, has greater a role and responsibility than that of a coordinating role (See page 24 in the 2040 Regional Parks Policy Plan for an overview of the Council's role in the Regional Parks System).
172	102	Funding	We embrace the major goals and strategies of the 2040 Regional Parks Policy Plan, but decision making on project sequencing and priorities is best left to the agencies implementing the plan.	The 2040 Regional Parks Policy Plan continues to reinforce the important role regional park implementing agencies and local elected officials have in prioritization of projects. The Council is committed to partnering with regional park implementing agencies to discuss projects. The plan articulates an aim for the Council to be involved in the discussion of the creation of the prioritized project list that is forwarded to the Legislature.

Line ID	Comment ID	Theme	Comment	Response
173	110	Funding	Pages 61-62: We are supportive of the information listed in the four bullet points on the bottom of page. In particular "create set aside competitive equity program for capital projects, specifically targeted toward projects that would enhance equitable usage of the Regional Park System" and "Work with regional park implementing agencies to prioritize funding requests using equity as a key factor."	Comment noted.
174	110	Funding	Page 79: Would it be possible to give examples of what is meant by "excessively ornate or elaborate facilities"? This is very subjective and may be seen as contradicting earlier guidance for special recreational features which are meant to be unique destinations attracting large numbers of people. Fairness is important, but if the focus is just on doing things as inexpensively as possible, this detracts from the profile and appeal of our regional park system.	The context of this discussion in the 2040 Regional Parks Policy Plan relates to cost-sharing for projects that exceed regional need. The determination of "excessively ornate or elaborate facilities" is made by the Metropolitan Parks and Open Space Commission and the Council as part of the review and approval of master plan to determine what project costs are eligible for regional parks funding. A regional park implementing agency may use its own funds or seek alternate forms of funding for these projects.
175	110	Funding	Page 80: What are the high-priority projects? Is this defined anywhere, or is there a list of projects? Who makes this determination?	This comment is in reference to Finance Strategy 2 with regard to the Regional Parks Capital Improvement Program (CIP). High priority projects are initially determined by the regional park implementing agency. The 2040 Regional Parks Policy Plan indicates that the Metropolitan Parks and Open Space Commission and Council will be involved in the prioritization of the project list proposed for funding using the Regional Parks System equity toolkit.

Line ID	Comment ID	Theme	Comment	Response
176	110	Funding	Page 81: Concerning the passage, "Projects that provide essential facility improvements and natural resource enhancements to allow for the initial public use of a regional park once there is adequate demand and acquisition base to support the development." It is unclear if this means construction of new facilities or improvements to existing ones.	This comment is in reference to Finance Strategy 2 with regard to the Regional Parks Capital Improvement Program (CIP). Essential facility improvements may apply to construction of new facilities or improvements to existing facilities, depending on the site. These improvements would be delineated in a regional park master plan. Projects funded through the CIP must be consistent with a Council-approved master plan.
177	110	Funding	Page 81: How is it determined when screening or fencing is "excessive?" Where is it most appropriate to begin with?	This comment is in reference to Finance Strategy 2 with regard to the Regional Parks Capital Improvement Program (CIP). Screening and fencing costs may be grant-eligible costs through the CIP. The Metropolitan Parks and Open Space Commission and Council will consider these costs when reviewing master plans and development funding requests.
178	110	Funding	Page 83: If it doesn't alter the share of funds received, what is the function of the equity assessment? Is it just to "track and monitor progress" as stated below? Is there a consistent use identified for this assessment across all the policy plan categories?	The purpose of the Regional Parks Equity Toolkit is to enhance decision-making and track and monitor progress. The Regional Parks Equity Toolkit is specifically for the Regional Parks System. No other system will utilize it. However, the Council-wide equity lens will be used throughout the Council. The equity lens will serve as the basis for the collaborative development of the Regional Parks Equity Toolkit.
179	11	Funding	Provide a consistent funding source comprised of new money, not CIP dollars, to support population outreach, equity programs and CIP projects targeted for equity distribution.	The Regional Parks Equity Grant program would be funded with Council bonds, not CIP funds. Beyond the obligatory state fund matches, it is at the Council's discretion how Council bond funds are spent.

Line ID	Comment ID	Theme	Comment	Response
180	11	Funding	Defer prioritization of capital projects to elected boards of implementing agencies that are accountable to their electorate and most knowledgeable about local population needs and priorities	The 2040 Regional Parks Policy Plan continues to reinforce the important role regional park implementing agencies and local elected officials have in prioritization of projects. The Council is committed to partnering with regional park implementing agencies to discuss projects. The plan articulates an aim for the Council to be involved in the discussion of the creation of the prioritized project list that is forwarded to the Legislature.
181	26	Funding	We agree with the statement on page 83: "it is important to note that the review of proposed project will in no way alter an agency's share of funding receive from either the Capital Improvement Program of the Parks and Trails Legacy Fund."	Comment noted.
182	26	Funding	We do not support the Council's proposal to expand its role in the prioritization of funding request for the Parks and Trails Legacy Fund. The Council should not disturb State funding programs that have greatly benefitted the region and have demonstrated consistent and reliable support from the Legislature. The ten implementing agencies are in the best position to determine how to allocate these resources within approved master plans. It is fair to ensure that the master plans the implementing agencies propose to pursue are providing park serves to all groups of citizens.	The 2040 Regional Parks Policy Plan continues to reinforce the important role regional park implementing agencies and local elected officials have in prioritization of projects. The Council is committed to partnering with regional park implementing agencies to discuss projects. The plan articulates an aim for the Council to be involved in the discussion of the creation of the prioritized project list that is forwarded to the Legislature.
183	26	Funding	The table on page 21 suggests that the Council matches Parks and Trails Legacy Funds for non-acquisition projects. This is not accurate and should be amended.	The table has been revised.

Line ID	Comment ID	Theme	Comment	Response
184	26	Funding	The appropriation of Operations and Maintenance funds is determined by Minn. Stat. Section 473.351, subd. 4. Parks and Trails Legacy grants are also determined by this statute. The current allocations of funds under this formula were the subject of extensive policy discussions by all ten implementing agencies. After years of discussions, the ten implementing agencies and the Council came to an agreement on a formula that provides each agency with a fair allocation of resources from the Capital Improvement Program and Parks and Trails Legacy Fund. This fair allocation of resources has allowed the implementing agencies to present a unified and coordinated effort to request funds from the Legislature. We agree that no change should be made in these formulas or allocations.	The Council agrees with this statement.
185	26	Funding	On page 106, the 2040 Regional Parks Policy Plan provides the level of operating and maintenance funds that been covered by state appropriations since 1985. This section should include discussion of how well the funding level is meeting Minn. Stat. 473.351, subd. 3 as presented on page 88.	Page 106 is focused on our grant programs and the funds the Council provides to regional park implementing agencies. Statements related to the funding level and Minn Stat. 473.531, subd. 3 are located in a different section of the Regional Parks Policy Plan and can be found on pp. 91-92.

Line ID	Comment ID	Theme	Comment	Response
186	26	Funding	<p>Finance Strategy 3 will ensure a minimum percent of the Parks and Trails Legacy Fund appropriations to implementing agencies will be used to "Connect People and the Outdoors", which is one direction in the 25 Year Parks and Trails Legacy Plan. The Legacy Plan lists 7 strategies of the "Connect People and the Outdoors" strategy. We support the range of strategies available to address this strategic direction of the Legacy Plan. We also support the direction in the 2040 Regional Parks Policy Plan to work with implementing agencies and other stakeholders to determine a minimum percentage of spending on this strategic direction, as along as all strategies in the Legacy Plan for the direction are considered. If this definition has been formally changed, we may not be able to support using a minimum percentage due to the critical projects we are working to fund in north and northeast Minneapolis to address equity, where we are focused on providing regional park access in traditionally underserved and underrepresented areas. We are committed to balancing the delivery of regional parks across the city and will need flexibility in this funding source to accomplish this goal.</p>	<p>In June of 2014, the Parks and Trails Legacy Advisory Committee unanimously supported the definition or scope of Connect People and the Outdoors as follows: 'Connecting people to the outdoors are projects that are non-capital items that attract new users and retain existing users.'</p>
187	26	Funding	<p>We request that Council staff also collaborate with implementing agency staff when determining which strategic direction or directions are assigned to specific funding requests. Currently, Council staff determines which strategic direction is most applicable to each funding request. In some cases, consultation with our staff may have resulted in assigning different strategic directions, especially for projects at Theodore Wirth RP and Above the Falls RP. This will alter the overall percentage of spending in the "Connect People and the Outdoors" strategic direction that the Council had previously reported.</p>	<p>The Parks and Trails Legacy Plan specifies that funds should be used across four pillars. The three coordinating partners, Metropolitan Council, Minnesota Department of Natural Resources, and Parks and Trails of Greater Minnesota, analyzed prior projects using the same analytical methods for consistency across agencies.</p>

Line ID	Comment ID	Theme	Comment	Response
188	25	Funding	We are concerned with the provision in which the Council and MPOSC will become involved in the prioritization of grant funding using equity as a lens. How will that be executed? With a lack of definition the impacts to implementing agencies is completely unknown. This policy sets a dangerous precedent in planning for the future of regional parks. In 2007, after careful and thoughtful deliberation, the Council approved the policy change allowing implementing agencies to prioritize their own projects. This change has allowed the agencies to line up matching funds more logically and reliably, with the confidence that the Council dollars would be available. Local prioritization has saved money and time by the logical phasing, bidding, and constructing of parks and trail with a consistent, dependable funding stream.	Language has been added to this section. The 2040 Regional Parks Policy Plan states reprioritization will in no way apply to regional park implementing agency projects that have secured a Federal or State match.
189	34	Funding	Any new initiatives outlined in the 2040 Regional Parks Policy Plan should come from new Council funding streams as we know that current funding levels are inadequate to meet current needs and mandates.	The Regional Parks Equity Grant program would be funded with Council bonds. Funds available for that program would be determined based upon meeting other funding obligations. The Council does not have other funding streams to access at this time.
190	34	Funding	Most of the implementing agencies' operating funds for the regional parks come from local funding. Recognizing this funding is important in getting the full picture of regional parks funding.	Suggestion noted. This is beyond the scope of the 2040 Regional Parks Policy Plan.

Line ID	Comment ID	Theme	Comment	Response
191	34	Funding	As the Council approved in 2007, the implementing agencies should continue to prioritize their park projects, with advice from Council staff and MPOSC. Implementing agency prioritization helps to augment Council funds with other funding streams, and realizes other cost and time efficiencies in the phasing of park projects. The success of local prioritization of capital projects is underscored by the 2013 visit count, which reported over 9.4 million visits in St. Paul and the 2008 Regional Park and Trails Survey, in which the City had good representation by diverse groups at its regional facilities and events. Using those numbers, we estimate around 2 million visits to our regional parks and trails by persons from diverse groups in 2013.	The 2040 Regional Parks Policy Plan continues to reinforce the important role regional park implementing agencies and local elected officials have in prioritization of projects. The Council is committed to partnering with regional park implementing agencies to discuss projects. The plan articulates an aim for the Council to be involved in the discussion of the creation of the prioritized project list that is forwarded to the Legislature.
192	8	Funding	Pages 20-21. This section does a commendable job of outlining the multiple state and regional funding sources that help acquire, build, and operate the Regional Park System. However, the Plan omits data that reflects the financial commitment Implementing agencies have made in developing and operating the system. While the initial state and regional contributions play a significant role in getting parks and facilities to an operating stage, the Implementing Agencies then assume nearly 90% of the costs to operate the system forever. In order to accurately portray the funding scenario, the Plan should incorporate statistics about local contributions and commitments in this section.	Language has been added to this section.



Line ID	Comment ID	Theme	Comment	Response
193	8	Funding	<p>Create a set-aside grant program with Met Council park bonds for capital projects that specifically aim to address strengthening equitable usage of the regional parks system. The Council and the Implementing Agencies have worked hard to develop an allocation process for the regional park funding that strives to allocate funding proportionately among the agencies based on services and needs. The agencies that are within areas targeted for equity use in the draft 2040 Regional Parks Policy Plan already receive a proportionately higher percentage of funding, and the residents in these areas generally have access to multiple regional park services areas. If the Council chooses to use funding to address equity, the Council should pursue new funding sources and utilize existing formulas for allocating these dollars among agencies.</p>	<p>As the 2040 Regional Parks Policy Plan illustrates, the Regional Parks Equity Grant program does not aim to target funds to a specific geographic location. Every regional park implementing agency has an opportunity to apply for those funds. Equitable use is a priority for the Council and calls for the use of Council bonds for that purpose.</p>

Line ID	Comment ID	Theme	Comment	Response
194	8	Funding	<p>Ensure regional park implementing agencies adhere to the 25-year Parks and Trails Legacy Plan to "connect people to the outdoors". The analysis used in developing this policy by Metropolitan Council staff was not reflective of what is happening with Parks and Trails Legacy Fund by Implementing Agencies. In the grant administration process, the Council categorizes funding into one four categories: Acquiring Land/Creating Opportunities, Connecting People to the Outdoors, Taking Care of What we Have, and Coordinating Among Partners. In this process, many projects are categorized by the Council as Creating Opportunities. We would argue that in creating opportunities we are also connecting people to the outdoors - the two are interrelated. The Council should acknowledge that funding any of the four categories also achieves the broad goal of connecting people to the outdoors. Do not create new rules forcing agencies to fund a specific category, as proposed on Page 99 of the Plan.</p>	<p>The Parks and Trails Legacy Plan specifies that funds should be used across four pillars. The three coordinating partners, Metropolitan Council, Minnesota Department of Natural Resources, and Parks and Trails of Greater Minnesota, analyzed prior projects using the same analytical methods for consistency across agencies. With regards to creating new rules, the Council must ensure the Park and Trails Legacy Fund appropriations are used in the manner intended to ensure long term support of the Legacy Amendment and a continued funding stream.</p>

Line ID	Comment ID	Theme	Comment	Response
195	8	Funding	<p>Work with regional park implementing agencies to prioritize funding requests, using equity as a key factor. We are concerned that this policy will evolve into criteria for funding decisions by the Council. As we have been told by Council staff, the proposed equity initiative and "Equity Toolkit" is intended to help agencies evaluate how proposed projects would impact equitable use of regional parks and trails in the agency's prioritization and decision making process, and will not be used as criteria by the Council to make funding decisions. However, Page 83 of the Plan states that "the Metropolitan Parks and Open Space Commission and Council will be involved in the prioritization of the project list proposed for funding for the Capital Improvement Program and Parks and Trails Legacy Plan" (see below). This is contradictory. We fully expect that the Council will adhere to staffs' interpretation of the use of equity in prioritizing funding requests. Although equity will be considered at the agency level, it won't be used at the Open Space or Council level to set agency priorities.</p>	<p>The 2040 Regional Parks Policy Plan continues to reinforce the important role regional park implementing agencies and local elected officials have in prioritization of projects. The Council is committed to partnering with regional park implementing agencies to discuss projects. The plan articulates an aim for the Council to be involved in the discussion of the creation of the prioritized project list that is forwarded to the Legislature.</p>
196	8	Funding	<p>Finance Strategy 2, pages 80-81. In the past, Capital Improvement Program funds could be used for acquisitions and for reimbursement for prior acquisitions. This policy resulted in huge success in acquiring some of the most important parts of the regional park system in Scott County. Removing the ability to use Capital Improvement Funding for acquisitions would be detrimental to future success. We request that you reinstate acquisition and reimbursement for prior acquisitions as eligible Capital Improvement Program expenses.</p>	<p>Language has been added to the plan.</p>

Line ID	Comment ID	Theme	Comment	Response
197	8	Funding	<p><i>Using the Regional Parks System equity toolkit, the Metropolitan Parks and Open Space Commission and the Council will be involved in the prioritization of the project list proposed for funding for the Capital Improvement Program and Parks and Trails Legacy Fund. We strongly object to this proposal without more clarification on what "involvement" means. The Implementing Agencies are in the best position to determine priorities for funding. While we support the Council facilitating the overall effort for equity, the Council shouldn't dictate how to get there by controlling how funding is invested at the local level. We believe the local agencies are in the best position to make these decisions.</i></p>	<p>Clarity has been added to this section. The 2040 Regional Parks Policy Plan continues to reinforce the important role regional park implementing agencies and local elected officials have in prioritization of projects. The Council is committed to partnering with regional park implementing agencies to discuss projects. The plan articulates an aim for the Council to be involved in the discussion of the creation of the prioritized project list that is forwarded to the Legislature.</p>
198	8	Funding	<p><i>Using Council bonds, the Council will create, fund, and administer a set-aside competitive grant program for capital projects explicitly aimed to strengthen equitable usage of the Regional Parks System. While we support the goal of this program, we believe the proposal is flawed. First, the program proposes to use "surplus" regional park bonding capacity. There is no such thing as a "surplus" bonding capacity if you take into account the already identified and unfunded regional park system needs. The Council has chosen to not bond to the full capacity in past years to meet this need. If the Council is serious about equity, it should identify new funding streams for this work.</i></p>	<p>The Regional Parks Equity Grant program would be funded with Council bonds. Funds available for that program would be determined based upon meeting other funding obligations. The Council does not have other funding streams to access at this time.</p>

Line ID	Comment ID	Theme	Comment	Response
199	8	Funding	We don't believe that investing in capital projects will result in an "equity" return on the investment. We believe that equity can be enhanced through programmatic changes, such as awareness and programming. While new facilities should be considered and be eligible for funding under the grant program, we believe that limiting this set-aside competitive grant program to capital projects will also limit its success.	The Regional Parks Equity Grant program would be funded with Council bonds. Council bonds can only be spent on capital projects. A Council research study asked participants to identify recommendations to enhance use of regional parks and trails. The third most common recommendation across all participants was to enhance the capacity of gathering spaces. As such, there are potential capital expenditures that participants noted would have a direct benefit to equitable use.
200	7	Funding	Our greatest concern is that the draft 2040 Regional Parks Policy Plan diverts future funds based on equity when overall funding has been inadequate. For example, operation and maintenance funding (as required by statute) has never been realized, there have been recent reductions in state bond funds, and we have advanced funded the regional park system by approximately \$18 million, placing additional burden on local government. The Council should conduct a comprehensive review of all regional park funding sources, including state bond fund proceeds, and advocate for full statutory funding to ensure equitable distribution of regional funds before any new programs are created.	Comment noted. Suggestions are outside of the purview of the 2040 Regional Parks Policy Plan.
201	86	Funding	As a pass-through funding organization, the Council has a legitimate interest in insuring state and regional funds are allocated consistent with overarching regional policies. To effectively do so, it is important that the Council be a good partner in the coalition that has successfully managed our regional parks and trails system that has become the envy of the nation.	The Council's role and responsibility in the Regional Parks System is far greater than serving as a pass-through funding organization. The Council looks forward to continuing to work with our partners and stakeholders to ensure the Regional Parks System continues to prosper.
202	86	Funding	Great concern regarding Finance Strategy 3: Ensure Parks and Trails Legacy Funds are spent in a manner that conforms to the statewide Parks and Trails Legacy Plan (P.81)	Comment noted.

Line ID	Comment ID	Theme	Comment	Response
203	86	Funding	Great concern regarding Finance Strategy 5: Where appropriate, equity will be a consideration in Regional Parks System funding and investment. (P. 82)	Comment noted.
204	86	Funding	It is important to recognize that the Council oversees a relatively minor portion of the total funding for the Regional Parks System. Less than ten percent of the \$100 million in total annual operating costs of the ten Park Implementing Agencies come through Council allocations, and our locally funded capital expenditures also typically account for more than the grants provided from state or regional sources.	Comment noted. State, regional, and local dollars all contribute the Regional Parks System. This attests to the importance of partnership and collaboration. The 2040 Regional Parks Policy Plan notes the importance of local contributions to the Regional Parks System.
205	7	Funding	The 2040 Regional Parks Policy Plan proposes to expand the Council's role and diminishes and undermines the role of local elected officials responsible for delivery of the regional park system. It is important that the Council does not usurp the authority of local elected officials in the improvement of the regional park system.	The 2040 Regional Parks Policy Plan continues to reinforce the important role regional park implementing agencies and local elected officials have in prioritization of projects. The Council is committed to partnering with regional park implementing agencies to discuss projects. The plan articulates an aim for the Council to be involved in the discussion of the creation of the prioritized project list that is forwarded to the Legislature.
206	7	Funding	The 2040 Regional Parks Policy Plan should recognize the role of the IA's in funding the vast majority of both capital and operation and maintenance (O&M) expenses related to the regional parks system.	Comment noted. Statements and illustrations of these important contributions can be found throughout the 2040 Regional Parks Policy Plan. Costs to operate and maintain the Regional Parks System can be found in Table 5-2. The plan also specifies that the amount provided by the state only accounts for an average of 9% of the total cost to operate and maintain the Regional Parks System. The plan does not provide capital expenditures by regional park implementing agencies.

Line ID	Comment ID	Theme	Comment	Response
207	7	Funding	The idea that major funding decisions will be made by a large group of "other partners and stakeholders" along with the IA's is not acceptable. The IA's own, manage and improve the regional parks system, have their own elected governance boards, are the experts in the field, and are best suited to determine how funding results in the highest public return.	Thrive MSP 2040 specifies three principles to guide Council work, one of which includes collaboration. The Council's Participant Engagement Plan outlines how the Council will be more inclusive in their decision making. The Council has an explicit commitment to enhance engagement with communities effected by Council funding and investment decisions.
208	7	Funding	The Council should advocate eliminating the special fund for North Mississippi Regional Park. Legislation of this type works against the intended equitable distribution of regional funds.	Comment noted.
209	7	Funding	(Page 62-63) The Council should advocate for full statutory operation and maintenance (O&M) funding before new programs are created. The Regional Parks Policy Plan makes no mention of the State's legal obligation under Minnesota State Statute 473.351 that " ...Each implementing agency must receive no less than 40 percent of its actual operation and maintenance expenses to be incurred in the current calendar year budget as submitted to the parks and open space commission." In fact, IA's have never received, on average, more than 9.47% of their actual operating expenditures incurred in any calendar year since the Statute's 1985 inception.	The Minn statute 473.315 language is included in Chapter 4, Finance Strategy 8. That strategy also states "continued state supplemental support to finance 40% of operation and maintenance costs of the regional system will also be sought". Table 5-2 also provides the average percentage of Operations and Maintenance funded by the state between the years of 1985 and 2013.
210	7	Funding	(Page 62-63) Current Council/State CIP, Acquisition Opportunity Funds (AOF) and Park and Trail Legacy funds fall short of current needs within the regional park system.	Comment noted.

Line ID	Comment ID	Theme	Comment	Response
211	7	Funding	<p>(Page 62-63) The goal of Regional Park implementing agencies is to "connect people to the outdoors."            We do this every day through the parks CIP which includes infrastructure and amenities relating to parks. The assertion that the Council will unilaterally ensure this is occurring, is assumptive and usurps the role of local elected officials in operating a regional park system. More appropriate language would include:  <i>The Metropolitan Council and regional park implementing agencies will work together to ensure the 25-year Parks and Trails Legacy Plan's intent to "connect people to the outdoors."</i></p>	Comment noted. Revisions have been made to that section of the plan.
212	7	Funding	<p>(Page 62-63) The Council does not currently prioritize IA's capital requests. Our Board of Commissioners establishes capital improvement priorities based on the approved master plans, recreational trends/needs, use, phasing, leveraging of funds, available budget and an array of other considerations including equity. The Board of Commissioners annually approves and authorizes a budget for prioritized capital projects.</p>	Comment noted.
213	7	Funding	<p>(Page 63) It is important that the Council does not usurp the authority of local elected officials. The Council does not manage capital improvements or operate a park system, and are not experts in prioritizing park system infrastructure and service provisions.</p>	<p>The 2040 Regional Parks Policy Plan continues to reinforce the important role regional park implementing agencies and local elected officials have in prioritization of projects. The Council is committed to partnering with regional park implementing agencies to discuss projects. The plan articulates an aim for the Council to be involved in the discussion of the creation of the prioritized project list that is forwarded to the Legislature.</p>



Line ID	Comment ID	Theme	Comment	Response
214	7	Funding	(Page 81-82) The regional park implementing agencies and the respective Boards are the best suited to determine how all funds including Park and Trail Legacy funds are used for the strategic growth of the park system. The Council should not have any authority requiring park agencies to use funds for specific purposes as long as the expenditure is in accordance with an approved master plan and associated with a park or trail unit in the metropolitan regional park system.	The 2040 Regional Parks Policy Plan continues to reinforce the important role regional park implementing agencies and local elected officials have in prioritization of projects. The Council is committed to partnering with regional park implementing agencies to discuss projects. The plan articulates an aim for the Council to be involved in the discussion of the creation of the prioritized project list that is forwarded to the Legislature.
215	7	Funding	The Metropolitan Council does not have the authority to dictate how implementing agencies spend Legacy funds.	The Parks and Trails Legacy Plan identified 5-year priorities, of which half fell within the pillar of Connect People and the Outdoors. The Council, as the fiscal agent, is responsible to uphold the Parks and Trails Legacy Plan and ensure that the money is spent in a manner intended. On average, since fiscal year 2010, 3% or less of Parks and Trails Legacy dollars have been spent to Connect People and the Outdoors.
216	7	Funding	Chapter 4; Strategy 6 (Finance Policy) - Regional park and trail system needs and associated improvements has outpaced Council and State funding resulting in increased and unfair local investment in the system. Under the current funding structure, there is an unfair burden placed on local taxpayers to fund the regional park system. The County has over \$18M approved for eligibility for future reimbursement. In 2013 and 2014, the County invested in Regional Park and trail capital improvements using local funds of \$6M and \$9M respectively. The County's share of Council CIP funding is \$900K and State Park and Trail Legacy funding of \$1.2M per year.	Comment noted.

Line ID	Comment ID	Theme	Comment	Response
217	7	Funding	Chapter 4; Strategy 6 (Finance Policy) - There is a need for increased Council advocacy for additional Regional Park funding. The 2040 Regional Parks Policy Plan should require the Council to comprehensively evaluate current and future needs and expense, compare how current funding provides for this expense, and establish revenue options to deal with any shortfall.	Comment noted. Suggestions are outside of the purview of the 2040 Regional Parks Policy Plan.
218	7	Funding	The Council should fund all approved reimbursements before other new funding programs are created.	Approved reimbursements are funded by the Capital Improvement Program. The regional park agencies chooses when to request reimbursement from its share of the Capital Improvement Program. Those funds are allocated to regional park implementing agencies based upon a formula specified in the policy plan (see p. 101).
219	7	Funding	Chapter 5 - Finance - We support the inclusion of the following language: <i>Acquisition for inholdings per approved master plans owned by local units of government is an eligible Park Acquisition Opportunity Fund expense.</i>	The Park Acquisition Opportunity Fund rules in Chapter 5 require that all properties proposed for acquisition be within Council-approved master plan boundaries and do not make a distinction or requirement regarding ownership of the properties being acquired.
220	7	Funding	Chapter 5 - Finance - We support the inclusion of the following language: <i>Acquisition for inholdings per approved master plans acquired by local units of governments via parks dedication may be reimbursed based on the parks dedication cash equivalent and is an eligible Park Acquisition Opportunity Fund expense.</i>	This would be a substantive change to the 2040 Regional Parks Policy Plan that also requires close consultation with the agencies that provide funds for the Acquisition Opportunity Fund Grant program. As such, we cannot add the proposed language at this time.
221	7	Funding	We agree with the policy that condemnation and associated expenses for acquisition of a master plan approved inholding are eligible Park Acquisition Opportunity Fund expenses.	Comment noted.

Line ID	Comment ID	Theme	Comment	Response
222	110	General	Supportive of effective coordination between other regional systems and the parks system. To achieve the goals of stewardship, prosperity, equity, livability, and sustainability through the regional parks system, careful attention must be paid to how the transportation, housing, and water resources systems support our regional parks.	Comment noted.
223	110	General	The City supports development of local plans, and local planned land uses, that are compatible with the regional parks vision. We agree with the Council and believe that compatible land uses are not limited to low-density styles of development. Furthermore, the City encourages the Council to consider how dense land uses, transportation, and built form can help to achieve the Metropolitan Council's equity goals as outlined in Thrive MSP 2040.	Comment noted. Suggestions are outside of the purview of the 2040 Regional Parks Policy Plan. The Council's Housing Policy Plan (HPP) and Transportation Policy Plan (TPP) consider and identify ways to increase equity in the region through the Council's various roles in dense land uses, transportation and built form. However, the Council's roles in the region are limited. Cities remain responsible for recognizing their unique situations and crafting plans that accommodate their own needs and regional systems. To the extent possible, specific actions are outlined in both the HPP and TPP.
224	110	General	The City supports the Council's efforts to protect the regional parks system from negative impacts and to mitigate those impacts. Specifically, the City supports development of a framework to address the impacts of transportation, such as aviation noise, to the regional park system.	Suggestion noted. This is beyond the scope of the 2040 Regional Parks Policy Plan.

Line ID	Comment ID	Theme	Comment	Response
225	110	General	Support the legislative directive to preserve large recreational open spaces in the metropolitan area. Preservation of these lands is important to Minneapolis resident's quality of life and to the city and region's economic, social, and environmental health. While we acknowledge the role that the regional parks play in the great metropolitan area, we encourage the Council to more directly acknowledge the role that the local park system plays in supporting the regional parks system - as well as how the local parks system can serve to meet the goals outline in the greater Thrive MSP 2040 document. Achieving the outlined goals of stewardship, prosperity, equity, livability, and sustainability is a tall task, and they become even more difficult to visualize and reach without encouraging local partners to emphasize the importance of local parks.	The 2040 Regional Parks Policy Plan includes a discussion on the role and importance of local parks in terms of their contribution to the overall outdoor recreation system. The policy plan, however, is specifically aimed to address policies and strategies related to the Regional Parks System to meet statutory requirements (Minn. Stat. 473.147). The Council does not have any authority related to local parks.
226	110	General	Page 6: We encourage the Met Council to consider not only how the regional parks system can meet the desired Thrive outcomes directly (i.e. - parks that serve underserved populations), but how the regional parks system can achieve positive outcomes in related systems like stormwater management and air quality improvement.	Suggestion noted. While the Council acknowledges the critical importance the Regional Parks System plays in environmental quality, data related to the direct impacts provided by the Regional Parks System are not available.
227	110	General	Page 15: Additional context would be helpful in understanding key elements of the region's existing conditions so that decisions about future actions can be compared to a baseline. For example, an explanation of why these standards are set would be helpful. How do these particular facilities meet the outlined Thrive goals today? How will they meet them in the future? The document should be setting us up for action, and setting guidelines for decision making about investments - answering these questions up front would get the region closer to addressing those goals.	Suggestion noted. This is beyond the scope of the 2040 Regional Parks Policy Plan.

Line ID	Comment ID	Theme	Comment	Response
228	110	General	Page 22: "In the 1880s, Horace Cleveland said: "Look forward for a century, to the time when the city has a population of a million, and think what will be their wants ..." In terms of this quote, it might be worth noting that he's referring to Minneapolis, whose parks were among the first regional parks and have set the precedent and standard for others regionally and internationally.	This clarification has been made in the 2040 Regional Parks Policy Plan.
229	110	General	Page 27: The site location definition seems to focus on suburban patterns of development. We question the definition's importance in classification of local parks. Perhaps the connection would be clearer with additional narrative describing how local parks can also contribute to the goals outlined in the Thrive document.	The description of local parks in Table 3-1 of the 2040 Regional Parks Policy Plan is meant to serve as a general guideline. Communities tailor planning for their local parks and trails according to their needs. The Council does not have the authority to determine standards for local parks.
230	110	General	Page 27: In reference to the "mini-park" definition, please clarify that this may be privately owned and/or incorporated within a development site - as opposed to a free standing facility which the rest appear to be. Would this also incorporate plazas or parklets, or are they considered beyond the scope of this typology?	This clarification has been made in the 2040 Regional Parks Policy Plan.
231	110	General	Page 27: We recommend that the Met Council define "physiography" or use a more colloquial term.	"Physiography" has been changed to "physical geography."
232	110	General	Page 27: While "proximity to elementary schools" characterizes many neighborhood parks, it does not necessarily include all of them.	This has been revised to read: "proximity to elementary schools <i>or residential neighborhoods</i> ."
233	110	General	Page 31: The reasons behind why these attributes make a good regional park may be evident to the authors, but the reader should be able to clearly connect why these attributes contribute to reaching the goals for the park system as outlined in <i>Thrive</i> .	Text has been added to this section to describe how the Regional Parks System can help the Council meet the Thrive MSP 2040 outcomes.
234	110	General	Page 73: The term "special population groups" should be defined here.	Language has been changed in this section.

Line ID	Comment ID	Theme	Comment	Response
235	110	General	Page 89: Concerning the language, "The Council may require plan modifications to local comprehensive plans ..." Who makes this determination? This could be problematic to implement. If the impacts include (as listed earlier on this page) traffic, noise, and visual obstruction, this could be used to describe the orderly and proper development of urban areas - such as along the riverfront in Downtown Minneapolis. It is not possible to guarantee that areas adjacent to parks will be quiet, lower density areas - in fact, in some cases it is the exact opposite.	The Council will review local comprehensive plans based on the 2040 Regional Parks Policy Plan. In the situation in which the comprehensive plan is determined to have a negative impact on the Regional Parks System, the Council will first negotiate with the community to try to find a solution that still conforms to the Policy Plan and meets local objectives. In the rare event in which these discussions are not successful, the Council retains its authority under state statute to require a community to modify its plan.
236	110	General	Page 90: Concerning the passage, "Increasing population densities adjacent to urban Regional Parks System units is not a detriment to those units if the urban development is designed in ways that are sensitive to areas that enjoy scenic views and the natural features of the Regional Parks System unit, and do not interfere with the operation and maintenance of the unit." This language helps contextualize the above section. Perhaps this should be included earlier, so it is clearer that the policy does not appear to be explicitly anti-urban?	Comment noted. Chapter 4 is structured to state the Council policy, then indicate strategies to accomplish the policy. Each strategy is outlined and then followed by clarification of specific circumstances that may be applicable to the strategy. The System Protection - Strategy 1 that is cited in the comment is not intended to be "anti-urban" and applies to all of the regional park implementing agencies.
237	110	General	Page 99: It would be useful to cross-reference these goals with the goals in <i>Thrive</i> . Where are these programs working in concert? Where are opportunities for synergy?	The goals listed are directly from the Parks and Trails Legacy Plan which was developed by the Minnesota Department of Natural Resources with input from the residents across the State of Minnesota. This plan applies to all of Minnesota and is not tied to Thrive MSP 2040. However, the strategic directions delineated in the Parks and Trails Legacy Plan will help meet the Thrive outcomes of Stewardship, Equity, Livability and Sustainability.

Line ID	Comment ID	Theme	Comment	Response
238	110	General	Page 114: This is very general language. What exactly is a park benefit? Could this just be a revenue stream that supports other park and recreational functions?	This policy is in reference to the use of regional parkland prior to its development as a regional park. A regional park implementing agency may have an opportunity to rent or lease existing buildings or amenities to be used for park purposes before formal park development.
239	101	General	Pg. 22 Planning for 2040, the statement referencing “two new regional parks” for Carver County is better stated as “two proposed additional regional parks”.	The statement has been revised to read: "Also proposed are two additional regional parks in Carver County and a regional park in the northwest corner of Anoka County--an area that has been identified as a potential park since 1974."
240	101	General	Pg. 61 Recreation Activities and Facilities Strategy 4, delete the word “to” insert the word “which” before the word “prevent”.	This sentence has been revised.
241	101	General	Pg. 112 indicates that ranking of projects within each regional park agency’s allocation is a component of the Regional Parks CIP process. We request the Council to define who determines the project ranking within regional park agencies. We support regional park agencies playing the primary role in ranking projects within their respective districts.	Clarity has been added to this section.
242	29	General	We need more parks for the future, to support a growing population in the Metropolitan area, and to preserve our fast disappearing open, natural space.	The 2040 Regional Parks Policy Plan outlines the System Plan. The System Plan adds almost 15,000 acres of regional parkland and quadruples the regional trail miles by 2040.
243	95	General	Getting all people into nature helps promote learning and a healthier lifestyle.	Comment noted.
244	128	General	Add language related to changing demographics.	A discussion of regional growth and demographics can be found in Chapter 1 of the 2040 Regional Parks Policy Plan.

Line ID	Comment ID	Theme	Comment	Response
245	77	General	Local control for specific things is best handled under the leadership voted by the people of that region. That's why I'm writing to ask you to avoid conflict of natural resource based regional parks from being directed by a non-voted group with limited input by the citizens most affected. I believe some things are best served by the oversight of a regional leadership team like Met Council, but local parks should remain in the domain of the local communities with their own elected officials. The closer people are to the issues of their own communities in such instances, the better their chances are for their voices to be heard.	Local parks are not within the purview of the Metropolitan Council. The role and responsibility of the Metropolitan Council is strictly in relation to the Regional Parks System.
246	12	General	The Plan notes that investments in the Rural Center are limited (p 10). It seems inconsistent to invest in a regional sewer interceptor connection to the City of Elko New Market and not invest in related elements of urban growth, including, but not limited to, regional park facilities.	Page 10 of the Plan states: " <i>Aside from the Regional Parks System</i> , investments in regional service and infrastructure are limited in the Rural Service Area."
247	6	General	The Plan would be greatly enhanced by including statistics about the amount of "Park" and "Park Reserve" land that exists and is proposed in each of the counties on a per capita basis. The Plan emphasizes the need for "equitable distribution of resources" and data would be helpful to allow cities and the general public to assess this element of the Plan.	The 2040 Regional Parks Policy Plan is a long-range plan. An analysis based on per capita basis would not take into consideration long-range population projections, which indicate very different conditions in 2040 than today.
248	59, 90	General	Support for the directive to "provide a comprehensive regional park and trail system that preserves high-quality natural resources, increases climate resiliency, fosters healthy outcomes, connects communities, and enhances quality of life in the region	Comment noted.
249	43	General	I would like the unelected Met Council to be abolished because it is one more layer of government trying to duplicate functions of existing elected government.	Comment noted.



Line ID	Comment ID	Theme	Comment	Response
250	59	General	Thank you for making stewardship, prosperity, equity, livability, and sustainability your desired outcomes.	Comment noted.
251	5	General	I disagree with the 2040 Plan. No one wanted to improve Minneapolis when it was 90% minority, but now everyone is so involved in integrating the city. You only see what you want to see, not what people are really concerned with.	Comment noted.
252	17, 18, 71, 126	General	Support the 2040 Regional Parks Policy Plan.	Comment noted.
253	131	General	Thanks to staff for excellent bones of the Plan with some thought provoking changes.	Comment noted.
254	131	General	Attended DNR Legacy Workshop and heard that we have an entire generation that doesn't know how to connect to nature; I share the concern for future of parks.	Comment noted.
255	124	General	Our current park system is good, but is not reflective of the growing needs of the region.	The Council agrees with this statement.
256	18	General	As a Hennepin County resident, a lover of the outdoors, and a professional working with low income American Indian youth in Minneapolis, I believe it is imperative that this plan is passed.	Comment noted.
257	100	General	Thrive's directives for the 2040 Regional Parks Policy Plan resonate with our mission. Our agency is equally concerned with developing future generations of nature-based parks and recreation enthusiasts.	The Council looks forward to working together with partners to develop future generations of recreation enthusiasts.
258	100	General	Our agency's Conservation that Works Agenda strongly aligns with the themes of connecting people to nature, emphasizing inclusiveness as an outcome.	Comment noted.
259	100	General	We applaud your efforts to integrate exciting new concepts from Thrive into the 2040 Regional Parks Policy Plan.	Comment noted.
260	59	General	Support efforts to develop policies to integrate parks with housing and transportation.	Comment noted.

Line ID	Comment ID	Theme	Comment	Response
261	133	General	There's a lack of detail regarding significant changes in new policy.	The Council is committed to continuing to work with regional park implementing agencies and other stakeholders in 2015 to discuss and develop remaining policy implementation details.
262	133	General	More due diligence should be done before implementation of policies.	The Council is committed to continuing to work with regional park implementing agencies and other stakeholders in 2015 to discuss and develop remaining policy implementation details.
263	102	General	Consider holding more frequent collaborative workshops and listening sessions between the regional park agencies and Council staff to build a unified, well synchronized, and balanced approach to addressing all of the priorities established in the State SCORP, Legacy Program and Regional Parks Policy Plan--not just the equity issue.	Suggestion noted. The 2040 Regional Parks Policy Plan states a commitment to convening meetings with regional park implementing agencies and other stakeholders. The additional topics suggested could be incorporated into those sessions.
264	110	General	We support a strong and rational connection between the Parks Policy Plan, the Transportation Policy Plan, the Housing Policy Plan, and the Water Resources Policy Plan. Investments in each system should be coordinated to maximize impact and fiscal efficiency. Proposals for expansion of the regional park system should be congruent with investments in other infrastructure. Attention to this detail is vitally important to impacting racial and ethnic disparities when it comes to populations served by the regional parks system. This issue is worthy of further in-depth analysis to determine specifically how investments in the transportation and housing systems can remove barriers to accessing the regional parks system.	The 2040 Regional Parks Policy Plan encourages regional trails to connect to transit, lifecycle and affordable housing, and areas of infill and redevelopment. The Policy Plan also includes a strategy to coordinate regional wastewater conveyance facilities with regional parks and trails for efficient use of public funds.

Line ID	Comment ID	Theme	Comment	Response
265	11	General	Compared to the 2030 Regional Parks Policy Plan which focused on growing the system to meet growing population needs, the 2040 Regional Parks Policy Plan presents a significant priority shift to maintaining the existing system and applying an equity focus to the system's visitor population. While we agree that equitable park use is essential, it also requests the Council be deliberate and balance needs for expansion, development, and redevelopment of the park system to meet demands of growing population.	The 2040 Regional Parks Policy Plan outlines the System Plan. The System Plan adds almost 15,000 acres of regional parkland and quadruples the regional trail miles by 2040.
266	26	General	The 2040 Regional Parks Policy Plan contains a wide range of information from overarching policy to specific examples. In some cases, it is difficult to understand the difference between policy, procedures, implementation tactics or a case example. This could lead to confusion and conflict during planning and approval processes. We recommend providing a clearer hierarchy of information in the document. This could be achieved by including subsections in the chapter that delineate policies, procedures, implementation tactics, etc.	As stated in the introduction of Chapter 4, the Regional Parks Policy Plan includes policies for recreation activities and facilities, planning, siting and acquisition, finance and system protection for the Regional Parks System. Strategies for accomplishing each policy are stated briefly, explained in more detail, and followed by the history and development of each strategy.

Line ID	Comment ID	Theme	Comment	Response
267	26	General	We urge the Council to consider using the same level of specificity throughout each section. For example, on pg. 63, the last strategy encourages park and trail design that conforms to changing recreational preferences. Three examples are provided that include providing amenities for aging populations, providing no-fee picnic areas and clustering amenities for multigenerational family gathering. The second example is specific amenity versus amenity types. It may be desirable to keep this level of direction in the draft plan. If so, it would be helpful to define statements this specific as implementation tactics and identify a specific measure of success for each tactic. This would provide clarity to implementing agencies on the level of unmet demand and/or when a tactic could be considered complete.	Comment noted. Language has been added to that section of the plan to denote the bullets are examples.
268	26	General	We appreciate the recognition of "naturally occurring or human built" in the definition of regional parks on pg. 31. This is especially critical for Minneapolis as it seeks to restore and recreate natural resources along the Mississippi River through the Above the Falls Regional Park Master Plan. We encourage this reference to be used throughout the document in related sections for regional parks.	This reference has been added to Siting and Acquisition Strategy 1 in Chapter 4 of the 2040 Regional Parks Policy Plan.
269	7	General	The partnership of the ten IA's and the Council should be recognized and respected. Thrive MSP 2040's principle of collaboration needs to be actualized through greater integration and authority of the ten-agency partnership in the regional policy setting process.	The Council agrees with this statement. The Council looks forward to collaborating with the regional park implementing agencies to further discuss plan details and implementation. Additional language has been added to the plan that supports the pivotal role the regional park implementing agencies have in operation and maintenance of the Regional Parks System.

Line ID	Comment ID	Theme	Comment	Response
270	8	General	We fully support continuing the existing framework for planning, acquisition, and development that is carried forward into the 2040 Regional Parks Policy Plan. We believe this strategy will continue to achieve outcomes that will serve today's residents and create new legacies for future generations.	Comment noted.
271	7	General	We generally support the following from Chapter 4: all residents should have the opportunity to enjoy the regional park system.	Comment noted.
272	68	Governance	Control of parks should remain local. One size fits all approach is unrealistic, inflexible, and harmful to good stewardship of the parks.	The Regional Parks System is designed to serve residents of the metropolitan region. As such, by their very nature, they are intended to be a regional asset, not just a local asset.
273	136	Governance	The partnership of the implementing agencies with the Met Council has built the system into what it is.	The Council agrees with this statement.
274	25, 133	Governance	Our organization appreciates the relationship with the Council.	Comment noted.
275	7	Governance	The Regional Parks Policy Plan proposes to expand the Council's role and diminishes and undermines the role of local elected officials responsible for delivery of the regional park system. We recommend that the Council respect the authority and commitment of local elected officials to the improvement of the regional park system.	The 2040 Regional Parks Policy Plan continues to reinforce the important role regional park implementing agencies and local elected officials have in prioritization of projects. The plan articulates an aim for the Council to be involved in the discussion of the creation of the prioritized project list that is forwarded to the Legislature.
276	86	Governance	We believe this crucial relationship can be strengthened for the future by formally integrating the Park Implementing Agencies into the policy development and fiscal allocation processes of the Council. A similar structure is already successfully used for policy and funding issues associated with the Regional Transportation System.	The structure of Metropolitan Parks and Open Space Commission is defined by State Statute. Restructuring is outside of the purview of the 2040 Regional Parks Policy Plan.

Line ID	Comment ID	Theme	Comment	Response
277	86	Governance	The ten Park Implementing Agencies are all governed by separate locally elected boards, and each has its own similar, but unique, mission. Despite these differences, we have all worked together successfully over the past 40 years in a partnership that comprises the Regional Parks System. The current balance of funding authority took many years to develop, and has been working well for many years. Each agency also partners successfully with local governments, stakeholder groups and other nonprofit and private entities. The current relationship between the Park Implementing Agencies and the Council is not as strong. The ten Park Implementing Agencies are the Regional Parks System, yet we have no formal role in the Council processes that determine policies which can significantly impact our operations.	The structure of Metropolitan Parks and Open Space Commission is defined by State Statute. Restructuring is outside of the purview of the 2040 Regional Parks Policy Plan.
278	86	Governance	We recommend that the membership of the Metropolitan Parks and Open Space Commission (MPOSC) be restructured so it is comprised of locally elected officials representing each of the ten Park Implementing Agencies	The structure of Metropolitan Parks and Open Space Commission is defined by State Statute. Restructuring is outside of the purview of the 2040 Regional Parks Policy Plan.
279	86	Governance	In a system primarily funded by locally derived taxes and fees, the locally elected officials responsible for raising those funds should appropriately have a seat at the table during any debates over policy issues that would impact their responsibilities. Equally important, these officials are in a position to provide the Council with technically and politically knowledgeable advice about regional park and trail issues.	The structure of Metropolitan Parks and Open Space Commission is defined by State Statute. Restructuring is outside of the purview of the 2040 Regional Parks Policy Plan. The regional park implementing agencies were engaged throughout the planning process. The Council is committed to working with park implementing agencies and other stakeholders in 2015 to discuss and implement the Policy Plan.

Line ID	Comment ID	Theme	Comment	Response
280	86	Governance	The governing boards of the Park Implementing Agencies are responsible for and accountable to users of our Regional Parks System, and together we have hundreds of specialized staff who are experts in the parks, trails and recreation field. It is not logical that these ten elected boards should have no official voice, not even at the advisory level, in the development of Regional Parks System - policies and the interpretation of those policies. The Council would be well served by the opportunity to draw on this expertise for advice on Regional Parks System issues, and to more closely integrate into their governance those agencies directly responsible for the operation of that system.	The structure of Metropolitan Parks and Open Space Commission is defined by State Statute. Restructuring is outside of the purview of the 2040 Regional Parks Policy Plan.
281	126	Health	Public park space is important to preventing many chronic diseases such as obesity, diabetes and heart disease. These diseases affect minorities such as Latinos, African Americans, and Native Americans at higher rates. Having parks that are friendly and inviting to them is very important in getting them out and being active. This is important for their health and our communities' overall future health, since they make up such a large percentage of the population and will continue to grow.	The Council acknowledges the role parks and trails play in addressing health disparities and looks forward to opportunities to work with partners and stakeholders to ensure the health benefits attained by park and trail use are available to all.

Line ID	Comment ID	Theme	Comment	Response
282	103	Health	The 2040 Regional Parks Policy Plan should identify in greater detail the fundamental health benefits of parks and trails which help provide individual access to an active lifestyle, builds healthy, stable communities, and offers children a place to play which is critical for child development. The development of trails enables and encourages people to exercise and providing exposure to nature improves psychological and social health. The 2040 Regional Parks Policy Plan should include a specific strategy on the health benefit of regional parks and trails.	Language has been added.
283	49, 51, 52, 54, 61, 65, 66, 68, 70, 72, 76, 88, 97	Lebanon Hills	Concerned about paved trail in Lebanon Hills Regional Park.	Comment noted. Proposed development in Lebanon Hills Regional Park is being considered through Dakota County's process to update the regional park master plan and is outside of the scope of the 2040 Regional Parks Policy Plan.
284	65	Lebanon Hills	Do not add a bike path through Lebanon Hills Regional Park.	Comment noted. Proposed development in Lebanon Hills Regional Park is being considered through Dakota County's process to update the regional park master plan and is outside of the scope of the 2040 Regional Parks Policy Plan.
285	46, 48, 49, 54, 64, 72, 76, 79, 80, 81, 88	Lebanon Hills	Concerned about development of Lebanon Hills Regional Park.	Comment noted. Proposed development in Lebanon Hills Regional Park is being considered through Dakota County's process to update the regional park master plan and is outside of the scope of the 2040 Regional Parks Policy Plan.
286	79	Lebanon Hills	Bike lane could be added to Cliff Road to serve transportation cyclists purpose instead of a bike transportation trail through Lebanon Hills Regional Park.	The Regional Bicycle Transportation Network as part of the 2040 Transportation Policy Plan has identified a Tier 2 regional bicycle network corridor in the vicinity of Cliff Road.



Line ID	Comment ID	Theme	Comment	Response
287	61	Lebanon Hills	It's appropriate for the Council to work on commuter trails outside the Lebanon Hills Regional Park Boundary.	The Regional Bicycle Transportation Network as part of the 2040 Transportation Policy Plan has identified a Tier 1 regional bicycle network corridor in the vicinity of Pilot Knob Road and Tier 2 regional bicycle network corridor in the vicinity of Cliff Road.
288	57	Lebanon Hills	Concerned about paved trail in Lebanon Hills Regional Park and Spring Lake Park Reserve.	Comment noted.
289	57	Lebanon Hills	Trails for non-motorized transportation in Lebanon Hills and Spring Lake Park Reserve will not be safe for other trail users.	Safety for trail users is very important and can be affected by the design and width of the trail. These considerations are a local decision made by the park implementing agency as part of a regional park master plan and subsequent trail development. This comment has been shared with Dakota County.
290	57	Lebanon Hills	The overspending on trails through Lebanon Hills and Spring Lake Park Reserve is a poor use of money; there are more important uses of our tax dollars, such as for education, vehicle roads and bridge improvements.	Regional parks system funding through the Metropolitan Council must be used to support regional parks and trails. These funds are not available for other public programs such as general education or roadway improvements.
291	52	Lebanon Hills	Money allocated to improving Lebanon Hills Regional Park would be best spent by removing non-native plants such as buckthorn and restoring native plants.	The Parks and Trails Legacy fund is intended to support parks and trails of Minnesota. The Parks and Trails Legacy Plan specifies that funds must be used across four distinct pillars. Each pillar has a subset of associated strategies, with 5-year priorities identified. In sum, there are a total of 75 different strategies across the four pillars. Removing non-native plants and restoring native plants are two important endeavors, but the Legacy Plan specifies funds should be spent across the four pillars. Regional park implementing agencies may make the determination of how to spend their allocations within the pillars. Additionally, these agencies may also use operations and maintenance funds for this work.

Line ID	Comment ID	Theme	Comment	Response
292	97	Lebanon Hills	Please leave Lebanon Hills Regional Park paths unpaved. I understand the disability thing--but there are far more parks they can go to that have paved paths.	Comment noted. Proposed development in Lebanon Hills Regional Park is being considered through Dakota County's process to update the regional park master plan and is outside of the scope of the 2040 Regional Parks Policy Plan.
293	68	Lebanon Hills	Picnic areas planned for the north side of Jensen Lake at Lebanon Hills Regional Park will be clearly visible from the trail on the south side of lake. Nature appreciation cannot coexist with this type of development.	Comment noted. Proposed development in Lebanon Hills Regional Park is being considered through Dakota County's process to update the regional park master plan and is outside of the scope of the 2040 Regional Parks Policy Plan.
294	68	Lebanon Hills	Lebanon Hills Regional Park is more like a park reserve than a regional park. In its relatively undeveloped state, it is unique resource for the metro and deserves a primary goal of preservation of its natural resources.	Comment noted.
295	110	Mapping	Page 24: Regarding the maps found throughout chapter three, in particular the existing and planned regional parks maps: It would be helpful to set the context for the reader with a narrative to accompany these maps. How does the geographic distribution and programming of these facilities meet regional needs and goals as outlined in Thrive?	The narrative for the maps is located in the section preceding each map. Text has been added to Chapter 3 identifying the ways in which the Regional Parks System advance the outcomes described in Thrive MSP 2040.
296	110	Mapping	Page 38: Should clarify that the numbers on the map correspond to the list of trails on the previous pages.	This clarification has been made in the 2040 Regional Parks Policy Plan.
297	110	Mapping	Page 56: Details on corridors and boundaries are difficult to see at this scale. Will there be more zoomed-in maps available as well to give a clearer picture of these areas? How does the planned geographic distribution of these facilities serve the future growth of the region in a way that provides equal access to residents?	After adoption by the Council, the 2040 Regional Parks Policy Plan will be available on the Council's website. This platform will allow the user to zoom and expand maps. Additionally, the System Statements that the Council will issue to local communities in 2015 will include more detailed maps to be used for local planning purposes.
298	1	Mapping	The Crystal Lake Regional Trail is listed in Table 36 on page 43, but it is missing from Figure 37 on page 44.	Figure 3-7 has been updated to include the planned Crystal Lake Regional Trail.

Line ID	Comment ID	Theme	Comment	Response
299	6	Mapping	Figure 3-7, Planned Regional Parks and Trails Not Yet Open to the Public should be modified as follows: the section of the MN River Greenway Regional Trail map on page 44 should be adjusted to the general trail alignment shown on Figure 51 from the current Burnsville Comprehensive Plan.	The alignment of the MN River Greenway Regional Trail is consistent with the trail alignment in the Burnsville Comprehensive Plan. It was difficult to see the trail on Figure 3-7 due to the overlap with the county boundary line. The map has been revised for more clarity on the trail alignment.
300	89	Mapping	It should be noted that Hennepin County has created a GIS based inventory of many aspects of the natural environment and ecosystems county-wide and has made this information web available for general use.	Comment noted.
301	100	Mapping	The State and Federal Land Map (p 26)--showing the MNRRA corridor as federally owned does not seem accurate. A boundary would be more appropriate. Scientific and Natural Areas are not shown. Our organization's 80 acre campus on Fish Hatchery Road is not shown.	Figure 3-1 has been revised to show the boundaries of Mississippi National River and Recreation Area and the Lower St. Croix National Scenic Riverway and include Scientific and Natural Areas. The 80 acre campus of the Minnesota Department of Natural Resources does not help fulfill regional recreation open space objectives and is thus not afforded protection under the Metropolitan Land Planning Act, so it has not been included on this map.
302	100	Mapping	Figure 3-11 The 2040 Systems Plan Map is a very important graphic, but it is difficult to read at that scale and it seems buried in the document. Maybe it could be in the introduction, then presented layer by layer and represented at the end of the chapter.	Comment noted. Due to the complexity of the map, Council staff chose to describe and map the Regional Parks System elements in a layer by layer, systematic fashion to avoid confusion for the reader.
303	100	Mapping	Figure 4-1 Bicycle Map could be easier to read and shown bigger if legend is relocated.	The 2040 Regional Parks Policy will undergo final layout and design after the Policy Plan is adopted by the Council. Additionally, the Policy Plan will be accessible through the Council's website, which will allow the reader to zoom and expand all maps.

Line ID	Comment ID	Theme	Comment	Response
304	26	Mapping	We urge the Council to recognize portions of Above the Falls Regional Park that are open to the public and should be included in the list on pages 31 and 32. The portions that are open should also be shown on Figure 3-6 and the park should be listed as partially open in Table 3.5. This would be similar to how partially open trails that are reference on page 36.	Above the Falls Regional Park has been added to Table 3-2 and Figure 3-2 as a Regional Park Open to the Public, and removed from Table 3-5.
305	110	Master Plans	Page 72: Concerning the passage that says, "Public services: A description of any non-recreational public services and facilities, such as roads or sewers, needed to accommodate the proposed recreational use, including the timing of these services and the arrangements necessary to provide them." The plan should say more about this matter. What roads are considered to be eligible parts of the regional park plan, and which ones are not? This has been a concern in the development of parks in Minneapolis.	This section has been clarified in the 2040 Regional Parks Policy Plan.
306	110	Master Plans	The region could use standards for master plans that help achieve goals outlined in Thrive, such as equity.	The 2040 Regional Parks Policy Plan includes design considerations for master plans that aim to strengthen equitable usage. Additionally, more robust requirements for public engagement and participation have been added to the criteria for developing a master plan. This engagement can help regional park implementing agencies identify ways to strengthen equitable usage of the regional park and trail.
307	110	Master Plans	Page 110: It is unclear whether a regional park boundary adjustment would meet these criteria (for amending the policy plan). Would that result in a policy plan amendment, or just a change to one of the regional park master plans?	A minor adjustment to a regional park boundary can be accomplished through an amendment to the master plan for the regional park.

Line ID	Comment ID	Theme	Comment	Response
308	101	Master Plans	Pg. 73 and 74 identifies public engagement and participation requirements for parks and trail master plans. a. The Council needs to clarify expectations by defining how these requirements will be measured. b. The Council is encouraged to play an active role in mitigating barriers to public engagement by providing resources and a means to reach populations outside an agency's jurisdiction.	Clarity has been added to this section. Master plans also must include a public engagement plan and participation process that seeks to mitigate existing racial, ethnic, cultural and linguistic barriers and includes people of diverse races, ethnicities, classes, ages, abilities and national origin to develop a regional park or trail master plan. The Council will provide staff assistance, where appropriate.
309	101	Master Plans	Pg. 74 outlines requirements for linking trail master plans. The Council should include guidance for meeting these requirements when linking trails are planned in conjunction with a highway project. Linking trail master plan requirements should be satisfied by the typical roadway corridor study process.	Master plans are used as the basis for the distribution of regional parks funding for acquisition and development. Linking regional trails may follow roadway corridors; however, it is unlikely that the entire extent of a regional trail and a roadway corridor will be coterminous. Additionally, regional park implementing agencies may have no control over when a roadway corridor study is conducted. Once a regional trail master plan has been approved by the Council, the implementing agency is eligible for funding for acquisition and development and the Council will require that the trail alignment be acknowledged in a local comprehensive plan. Therefore, it is in the regional park implementing agency's best interest to develop its own regional trail master plan.
310	3	Master Plans	The master plan for Grey Cloud Island Regional Park is out of date. The ultimate development of the island needs to result from a collaborative effort that meets policies and outcomes in Thrive, but of local directives as well. The Policy Plan should reflect this planning process.	As a long range planning document, the 2040 Regional Parks Policy Plan does not specify when master plans for specific regional parks or trails should be updated. The need for, and timing of, the development of a master plan is typically determined by the regional park implementing agency. This comment has been forwarded to Washington County.
311	89	Master Plans	Support for the stewardship and natural resources requirements for greenway master plans.	Comment noted.

Line ID	Comment ID	Theme	Comment	Response
312	58	Master Plans	Master plan requirements should encourage park units to seek and respond to prioritizing the whole management of a park, from putting in trails to programming	Master plans are used as the basis for the distribution of regional parks funding for capital expenditures including acquisition and development. The specific programming of a regional park is a local decision for which the Council has no authority.
313	130	Master Plans	The master plan requirements in the Plan provide much needed content on participation and engagement.	Comment noted.
314	102	Master Plans	We endorse the principle that stakeholder and community engagement processes should continue to be undertaken when developing master plans and comprehensive plans associated with regional parks and trails.	The Council agrees with this statement.
315	110	Multimodal	Page 13: Meeting multimodal transportation goals should also include providing transit access in, around, and through regional parks where possible. This is a stated goal of the National Park Service for the Mississippi National River and Recreation Area (MNRRA), which includes regional riverfront parkland in Minneapolis (see <a href="http://www.nps.gov/miss/parknews/alternative_trans_plan.htm">www.nps.gov/miss/parknews/alternative_trans_plan.htm</a> ). It also offers the potential to relieve some of the traffic and parking burden for some of the most heavily used regional parks.	Planning Strategy 2 of the 2040 Regional Parks Policy Plan indicates that the Council will collaborate with Metro Transit or local transit providers to determine the feasibility of adding transit stops that are convenient to regional parks and trails, where feasible.
316	110	Multimodal	Page 77: Regarding Planning strategy 2 "Promote enhanced multimodal access to regional parks, regional trails and the transit system," we are supportive of this strategy and think it should be explored in greater detail and depth.	Comment noted.

Line ID	Comment ID	Theme	Comment	Response
317	101	Multimodal	Pg. 63 and 64 reference Regional Trails and the Regional Bikeway Transportation Network. Combining commuter bike traffic with recreational users may not be compatible without adding additional trail width or other considerations to accommodate additional traffic and higher speeds of commuters.	Comment noted. The 2040 Regional Parks Policy Plan does not include design standards for trails. Trail width and other accommodations should be taken into consideration at the local level when planning regional trails that are also intended to serve the regional bicycle transportation network.
318	118	Multimodal	We are fortunate to be able to bike to so many wonderful parks in our neighborhood --Minnehaha Falls, Lake Nokomis, Lake Hiawatha, the Mississippi River -- and are excited to see Como Park is now easy to get to by train and the new bus connection, as well as by bike.	Comment noted.
319	90	Multimodal	Support Planning - Strategy 2: Promote enhanced multimodal access to regional parks, regional trails and the transit network, where appropriate.	Comment noted.
320	34	Multimodal	We are interested in partnering with the Council on its multimodal access initiative. We believe helping people get to metro regional parks by transit and bike/ped trails will have a significant impact on increasing equitable access to our parks. Metro Transit bus routes that go directly to the parks or trails entry area would be a meaningful first step.	The Council looks forward to working with the regional park implementing agencies, transit providers, and other stakeholders to enhance multimodal access to the regional parks system.

Line ID	Comment ID	Theme	Comment	Response
321	4, 13, 23, 24, 27, 29, 30, 31, 32, 33, 35, 36, 37, 38, 39, 40, 41, 42, 84, 89, 91, 104, 105, 106, 107, 108, 109, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 126, 140	Multimodal	Support the Policy Plan's focus on promoting greater multimodal access to Regional Parks System.	Comment noted.
322	110	Natural Resources	Page 12: While the focus of plan consistency is on natural resource protection and assets, the original charge for the regional park system (as stated on p. 14) is to develop "regional recreational open space for public use. " While these two goals can work in tandem, shouldn't there be something in the local planning directives that addresses the more "active" use of parks as opposed to just the passive approach of conservation? While staff acknowledges that the Thrive document has already been finalized, we encourage the Met Council to consider addressing the issue of "active" use of parks through local comprehensive planning efforts by encouraging municipalities to plan for their local parks systems in a way that supports the aforementioned desires . By doing so, local parks can better integrate with and complement the regional system.	Suggestion noted. The Council does not have authority over local parks, so this is beyond the scope of the 2040 Regional Parks Policy Plan. However, the Council will provide guidance and information to local communities through the Local Planning Handbook to help inform local comprehensive planning.



Line ID	Comment ID	Theme	Comment	Response
323	110	Natural Resources	Page 12: Does Natural Resource Protection also refer to extractive resources? Are our regional park investments being made in such a way that both preservation of open space and protection of extractive uses can be accomplished with consistent and complementary actions?	The context of natural resource protection in the 2040 Regional Parks Policy Plan refers to lakeshore, wetlands, hardwood forests, native prairies and groundwater recharging areas. The regional parks system protects and preserves these natural resources. The presence of viable aggregate resources is not a factor in determining the appropriateness of preservation of these lands within the regional parks system. In cases where viable aggregate resources are overlain by environmentally sensitive lands, including lands supporting high quality natural resources, the Council finds site protection and preservation to be an acceptable and preferential long-term land use rather than mining of the aggregate resources, which would permanently destroy the sensitive natural resources of the site.
324	101	Natural Resources	Pg. 58 Recreation Activities and Facilities Strategy 1, the 4 <sup>th</sup> bullet should be softened to state, "...and not substantially impact its natural resources in a negative way."	Suggestion noted. The language in the 2040 Regional Parks Policy Plan indicates that recreational activities should be in harmony with and not result in degradation of natural resources within the regional parks system. The suggested language could be considered to find it acceptable to allow unspecified but potentially extensive levels of degradation (on a cumulative basis) of natural resources by recreational activities, which the Council does not consider appropriate or consistent with management of the regional parks system.
325	59	Natural Resources	Appreciate the acknowledgment that it is vital to protect natural resources that are the foundation of prosperity.	Comment noted.

Line ID	Comment ID	Theme	Comment	Response
326	68	Natural Resources	Concerned about the Plan's emphasis on parks as a recreation resource, rather than a natural area resource	The Council is mandated to provide for a Recreation Open Space System (Minn Stat 473.147). While the Council places priority on natural resource protection, the Regional Parks System was created by the Legislature to provide for recreational opportunities in the metropolitan region.
327	58	Natural Resources	The Plan needs a policy that preserves minimally developed parkland in as large of pieces as possible and ensure it is distributed across the system.	The 2040 Regional Parks Policy Plan requires park reserves to be at least 1,000 acres in size and at least 80% of the land to be managed as natural lands that protect the ecological functions of the native landscape.
328	139	Natural Resources	The Plan lacks an overview of a natural resource piece.	The Metropolitan Council operates a water quality monitoring program that measures the quality of effluent leaving metropolitan wastewater treatment facilities, ambient water quality conditions in area rivers and lakes, and the quality of water leaving tributary watersheds within the seven county metropolitan area. The Council's watershed outlet monitoring program collects data about stream base flow and runoff (snowmelt and rainfall) events. Our lake monitoring program, which was instituted in the 1980's, has allowed the Council and its volunteer partners to collect water quality data on over 150 of the region's 950 lakes, helping to assess both their current conditions, and to see how lake conditions are changing over time. Additionally, the Council worked with the Department of Natural Resources in 2003 to develop a map of Regionally Significant Ecological Areas, and with the Minnesota Geological Survey in 2000 to develop an inventory of viable aggregate resources within the seven county metropolitan area.
329	139	Natural Resources	Met Council should monitor natural resources regionally	Comment noted. The Council, however, does not have statutory authority to do so.

Line ID	Comment ID	Theme	Comment	Response
330	59	Natural Resources	Support efforts to develop policies to protect the region's water quality.	Comment noted.
331	68	Natural Resources	Equal access can never be applied fully to a natural area. Making sure people have an opportunity to enjoy the parks is not the same as changing the parks so people will use them. A park is of value in and of itself and development of natural areas must be limited in order to preserve and enjoy them.	Minn. Stat. 473.147 requires the Council to develop a policy plan that identifies areas to provide a system of regional recreation open space to reasonably meet the <i>outdoor recreation needs</i> of the metropolitan area. The 2040 Regional Parks Policy Plan emphasizes the need to balance providing facilities with the impact those facilities have on a regional park.
332	93	Natural Resources	The Plan should provide guidance which will assure a legacy of healthy ecosystems and access to open recreation space close to home for future generations.	The foundation of the 2040 Regional Parks Policy Plan is built upon providing regional recreation open space and protecting natural resources.
333	139	Natural Resources	There is a lack of wilderness and minimally developed recreation space	The 2040 Regional Parks Policy Plan requires park reserves to be at least 1,000 acres in size and at least 80% of the land to be managed as natural lands that protect the ecological functions of the native landscape.
334	100	Natural Resources	The 2040 Regional Parks Policy Plan could be strengthened by discussing the ecological services that the system provides, not only the regional park reserves, but the regional parks especially in the urban core of the metro area. The regional parks along the Mississippi River, for example, are part of an important national flyway. Water and air quality benefits are also provided to residents of the region.	Additional language has been added to the Policy Plan. The environmental benefits of parks and open space have been added to the beginning of Chapter 2.

Line ID	Comment ID	Theme	Comment	Response
335	100	Natural Resources	The 2040 Regional Parks Policy Plan could be strengthened by outlining the threats to these systems--among the most obvious are incremental development decisions; increased stormwater discharges that threaten stream stability and degrade water quality; and invasive species that destabilize native ecosystems. These threats can be expected to become worse as effects of climate change create flashier storms and more extreme weather, leaving plants and animals more susceptible to diseases. Recreation values are diminished when the water, plant and animal communities are degraded.	Additional language regarding climate change has been added to the Policy Plan. Language in Chapter 2 frames the discussion in terms of benefits afforded by parks and open green space, rather than framing it in terms of threats.
336	100	Natural Resources	The 2040 Regional Parks Policy Plan could be strengthened by creating a strategy that specifically focuses on restoring natural areas in all elements of the regional parks system. The strategy could appear under the System Protection Policy or the Recreation Activities and Facilities Policy, assuming that high quality passive recreation activities such as birding require a healthy ecosystem "facility."	Minn. Stat. 473.147 requires the Council to develop a policy plan that identifies areas to provide a system of regional recreation open space to reasonably meet the <i>outdoor recreation needs</i> of the metropolitan area. The 2040 Regional Parks Policy Plan emphasizes the need to balance providing facilities with the impact those facilities have on a regional park.
337	90	Natural Resources	Council should provide guidance to regional park implementing agencies on addressing the impacts on natural resources from climate changes. Climate change impacts include changes in the geographic range of species, including flora and fauna; the spreading of invasive species and changes to aquatic habitats as a result of warming surface waters. Consider working with the MN Department of Natural Resources and the University of Minnesota on these issues.	Additional language regarding climate change has been added to Chapter 2 in the 2040 Regional Parks Policy Plan.

Line ID	Comment ID	Theme	Comment	Response
338	111, 132	Other	Suggest food foraging in regional parks for berries, nuts, fruit.	The Council's role with the 2040 Regional Parks Policy Plan is to plan for the outdoor recreation needs of the metropolitan area and determine how regional parks funding is allocated and administered. Food foraging in a natural resources based system can potentially present challenges and is an operational issue that is best determined by the individual regional park implementing agencies.
339	100	Other	While it is understood that the Council addresses only the 7 county area, some discussion of planning and coordination with bordering counties (in both states) would be helpful, both in text and graphically in the maps.	The Council acknowledges that coordination with adjacent counties is important and works with the Minnesota Department of Natural Resources and the Greater Minnesota Regional Parks and Trails Commission to help implement the Parks and Trails Legacy Plan. The 2040 Regional Parks Policy Plan is required by Minn. Stat. 473.147 to plan for a system of regional recreation open space that reasonably will meet the needs of the people of the metropolitan area. The Council's authority is limited to the 7-county metropolitan area, so the inclusion of maps and text for bordering counties may be misinterpreted. However, text has been added to the 2040 Regional Parks Policy Plan that encourages park implementing agencies to coordinate with adjacent counties during the development of a regional park or trail master plan, if applicable.
340	136	Other	Areas to do better included awareness, opportunities for access, research for where the barriers are, recognition from the Legislature in their role in making recommendations for the legacy funds.	Comment noted.
341	127	Park/Trail Activities	Not enough mention of inline skating in the Plan.	A description of inline skating can be found under Recreation Activities and Facilities Strategy 1 in Chapter 4 of the 2040 Regional Parks Policy Plan.

Line ID	Comment ID	Theme	Comment	Response
342	90	Park/Trail Design	Support ensuring that park and trail design align with changing preferences	Comment noted.
343	103	Park/Trail Design	Request additional information on specific design elements that would help address equity concerns--that could be incorporated into future planning documents.	Design considerations for master plans to strengthen equitable usage of the Regional Parks System can be found under Planning Strategy 1 in the 2040 Regional Parks Policy Plan. Master plans also must include a public engagement and participation process that seeks to mitigate existing racial, ethnic, cultural and linguistic barriers and includes people of diverse races, ethnicities, classes, ages, abilities and national origin to develop a regional park or trail master plan. Feedback from this engagement will help inform how to address equity concerns.
344	103	Park/Trail Design	2040 Regional Parks Policy Plan identifies amenities such as picnic areas near parking lot and providing benches, design non-fee picnic areas that accommodate mid-sized groups, and clustering amenities for multigenerational family gatherings. The swim pond area in Lake Elmo Park Reserve is a good example of where this is already being done.	Comment noted.
345	102	Park/Trail Design	We endorse the principle that regional park and trail design should be flexible to conform to changing recreational	Comment noted.

Line ID	Comment ID	Theme	Comment	Response
346	103	Process	Commend the hard work of staff to put together the 2040 Regional Parks Policy Plan in a relatively short amount of time. Timeframe was too short to incorporate meaningful dialogue necessary to answer important questions. Recommend that the process be extended to allow meaningful dialogue between the Council and the implementing agencies.	The policy plan process began with the development of Thrive MSP 2040, which included extensive public engagement over the course of two years. Thrive provided significant input to the regional parks planning process. The 2040 Regional Parks Policy Plan was developed in 2014 over the course of several Metropolitan Parks and Open Space Commission meetings and additional stakeholder involvement. The Council lengthened the 2040 Regional Parks Policy Plan adoption process to provide more time for discussion. The Council is committed to continuing to work with regional park implementing agencies and other stakeholders in 2015 to discuss and develop remaining policy implementation details.
347	25	Process	We have strong concerns regarding the 2040 Regional Parks Policy Plan due to lack of detail and the ambiguity around many of the significant changes in policy. Without an understanding of how these policies will be implemented, we cannot give adequate response to the proposed changes.	The Council is committed to continuing to work with regional park implementing agencies and other stakeholders in 2015 to discuss and develop remaining policy implementation details.
348	8	Process	This is an important initiative that will set the stage for future generations. The process for developing and approving the Plan has been accelerated. The Council should not force through changes based on an arbitrary timeline and without significant dialog with Implementing Agencies, which up to this point has not occurred.	The 2040 Regional Parks Policy Plan was developed in 2014 over the course of several Metropolitan Parks and Open Space Commission meetings. Development of the plan included multiple discussions with regional park implementing agencies, as well as stakeholder involvement. The Council lengthened the 2040 Regional Parks Policy Plan adoption process to provide more time for discussion. The Council is committed to continuing to work with regional park implementing agencies and other stakeholders in 2015 to discuss and develop remaining policy implementation details.

Line ID	Comment ID	Theme	Comment	Response
349	8	Process	Rather than reviewing each of the four policy plans collectively, the plans have staggered review timelines making it impossible to ensure that there is consistency among the plans and a common vision.	All system and policy plans need to be adopted in 2015 to allow time for system statements to be written.
350	8	Process	We would ask that you consider tabling a recommendation on the 2040 Regional Parks Policy Plan until the Implementing Agencies can meet and work collectively with Council staff to address our concerns. This approach has proven to be very effective in the past, and we are confident would add value to this initiative.	The Council lengthened the 2040 Regional Parks Policy Plan adoption process to provide more time for discussion. Council staff and regional park implementing agencies had a discussion on November 20, 2014. The Council is committed to working with regional park implementing agencies and other stakeholders in 2015 to discuss remaining policy implementation details.
351	7	Process	There was an inadequate amount of time for elected officials and stakeholders to adequately shape review and provide thoughtful and meaningful input on this comprehensive policy document. We recommend that the process be extended to include a two-way dialogue with local elected officials.	The policy plan process began with the development of Thrive MSP 2040, which included extensive public engagement over the course of two years. Thrive provided significant input to the regional parks planning process. The 2040 Regional Parks Policy Plan was developed in 2014 over the course of several Metropolitan Parks and Open Space Commission meetings and additional stakeholder involvement. The Council lengthened the 2040 Regional Parks Policy Plan adoption process to provide more time for discussion. The Council is committed to continuing to work with regional park implementing agencies and other stakeholders in 2015 to discuss and develop remaining policy implementation details.



Line ID	Comment ID	Theme	Comment	Response
352	86	Process	We continue to have significant concerns about the process used to develop the 2040 Regional Parks Policy Plan, and more important, the future implications of that plan for the partnership between the Council and ten Park Implementing Agencies, who own and are responsible for operating our Regional Parks System. We first raised these concerns more than six months ago in a letter addressed to MPOSC, and have consistently reiterated these same issues at the few opportunities permitted for public input. It is disappointing that none of these concerns has ever been addressed as the policy setting process has continued, with the Park Implementing Agencies relegated to the role of outside commenters, rather than treated as collaborative partners.	The Council lengthened the 2040 Regional Parks Policy Plan adoption process to provide more time for discussion. The Council is committed to continuing to work with regional park implementing agencies and other stakeholders in 2015 to discuss and develop remaining policy implementation details.
353	86	Process	We recommend that the Council recognize the Park Implementing Agencies' past and ongoing commitments and accomplishments to the provision of equitable service, and immediately engage them in the regional policy planning to support these shared goals. (Comment letter provided examples of past and ongoing efforts of the agency).	Opportunities for engagement were provided throughout the plan development process and the Council is committed to continuing to working with regional park implementing agencies and other stakeholders in 2015 to discuss and develop remaining policy implementation details.
354	86	Process	It is unfortunate that the Council ignored our actions that provide equitable service to all residents and our attendant expertise, and instead opted to draft equity policies without engaging the ten Park Implementing Agencies, who are directly responsible for actually providing park services to residents throughout the Twin Cities region.	Opportunities for engagement were provided throughout the plan development process and the Council is committed to continuing to working with regional park implementing agencies and other stakeholders in 2015 to discuss and develop remaining policy implementation details.

Line ID	Comment ID	Theme	Comment	Response
355	86	Process	We strongly encourage the Council to table any further action on the 2040 Regional Parks Policy Plan until such time that the ten Park Implementing Agencies are effectively engaged in the policy planning process, like we should have been throughout the past year. Tabling the draft plan will provide the time needed to reestablish the trust which underpins the partnership between the Council and the ten implementing agencies.	The Council lengthened the 2040 Regional Parks Policy Plan adoption process to provide more time for discussion. The Council is committed to continuing to work with regional park implementing agencies and other stakeholders in 2015 to discuss and develop remaining policy implementation details.
356	86	Process	Unfortunately, the 2040 Regional Parks Policy Plan does not advance our shared interests, because the Council has not been a good partner. The top down draft plan was not developed collaboratively with those agencies most knowledgeable about park, trail and recreation services, and most important, actually responsible for implementing the plan. This is especially troubling when the draft plan proposes to move prioritization and decision-making authority out of the hands of the ten Park Implementing Agencies, and under the province of the Council.	Council staff spent over 25 hours engaged in policy discussions with regional park implementing agency staff during the development of the Regional Parks Policy Plan. Additionally, their input on draft policies were welcomed at five Metropolitan Parks and Open Space Commission meetings.
357	86	Process	There has been a troubling pattern of indifference to and seemingly willful exclusion of those agencies directly accountable for the regional parks system (examples cited in comment letter).	Council staff spent over 25 hours engaged in policy discussions with regional park implementing agency staff during the development of the Regional Parks Policy Plan. Additionally, their input on draft policies were welcomed at five Metropolitan Parks and Open Space Commission meetings.
358	86	Process	This is not the way the Council should be treating their purported "partners" in the Regional Parks System. To insure the effective implementation of the Regional Parks Policy Plan, those of us actually responsible for managing that system <i>must</i> be in the loop and at the table, and not relegated to the role of after-the-fact spectators.	Council staff spent over 25 hours engaged in policy discussions with regional park implementing agency staff during the development of the Regional Parks Policy Plan. Additionally, their input on draft policies were welcomed at five Metropolitan Parks and Open Space Commission meetings.

Line ID	Comment ID	Theme	Comment	Response
359	86	Process	The partnership between the Council and the ten Park Implementing Agencies has been weakened by the policy planning process that excluded those of us directly responsible for planning, developing, operating and funding the regional park system.	The Council highly values the partnership with regional park implementing agencies and the shared interest in the Regional Parks System. The Council is committed to continuing to work with regional park implementing agencies in 2015 to discuss and develop remaining policy implementation details.
360	7	Process	The Council provided an inadequate amount of time for stakeholders to adequately shape, review and provide thoughtful and meaningful input on this comprehensive policy document.	The policy plan process began with the development of Thrive MSP 2040, which included extensive public engagement over the course of two years. Thrive provided significant input to the regional parks planning process. The 2040 Regional Parks Policy Plan was developed in 2014 over the course of several Metropolitan Parks and Open Space Commission meetings and additional stakeholder involvement. The Council lengthened the 2040 Regional Parks Policy Plan adoption process to provide more time for discussion. The Council is committed to continuing to work with regional park implementing agencies and other stakeholders in 2015 to discuss and develop remaining policy implementation details.
361	7	Process	While the plan repeatedly states that the Council has sought input from IA representatives, there have only been a handful of meetings between Council staff and IA's to discuss the merits of the plan, and in at least two of those meetings, IA input was severely restricted by Council representatives. When input was provided, the draft Regional Parks Policy Plan was left unchanged.	Council staff spent over 25 hours engaged in policy discussions with regional park implementing agency staff during the development of the Regional Parks Policy Plan. Additionally, their input on draft policies were welcomed at five Metropolitan Parks and Open Space Commission meetings.
362	7	Process	We request the Council slow the process and provide opportunities for added dialogue with elected officials from the ten IA's and other stakeholders to address pending issues and strengthen support of an improved policy document.	The Council lengthened the 2040 Regional Parks Policy Plan adoption process to provide more time for discussion.

Line ID	Comment ID	Theme	Comment	Response
363	110	Recreation	Page 24: There are also some active recreation areas within regional parks, and they are among some of the most popular and well-used elements (e.g. Como Park, Hyland Park Reserve, Elm Creek Park Reserve, Minnehaha Park). This should be acknowledged in the plan.	Page 24 contains a high level introductory statement about regional parks. A description of recreation within the Regional Parks System is included as part of Recreational Activities and Facilities - Strategy 1 in Chapter 4.
364	110	Recreation	Page 62: It's worth noting that "playground use" is not on the list of approved regional park uses. However, it may be an important component to attracting diverse populations, which tend to be younger on average and have more children than the general population; as outlined in the Thrive document, these are demographic trends that are projected to hold true for the region as a whole.	Additional language has been added to Recreation Activities and Facilities - Strategy 1.
365	90	Recreation	Support Recreation Activities and Facilities- Strategy 2: Most heavy recreational use should be accommodated in the more urban parks.	Comment noted.
366	138	Recreation	Costs are too high for transit, parking and entering a park.	Comment noted.
367	139	Recreation	If we don't allow access for all people to develop a sense of nature, we will lose people's relationship to nature. People in the urban area need to be able to escape the built environment.	Comment noted.
368	100	Recreation	It is good to see OHV (Off Highway Vehicles) acknowledged as a recreational use and mountain biking is acknowledged with caveats.	Comment noted.

Line ID	Comment ID	Theme	Comment	Response
369	100	Recreation	State Parks, Lands and Trails Section (p 24). The national and state water trail designations in the metro should be included in the discussion. There are 6 state water trails and their attendant system of boat and canoe launches that run through or touch the metro. DNR and its local unit of government partners actively manage the State Water Trails for canoeing, kayaking, boating and camping. 72 miles of Mississippi River and 4 miles of the Minnesota River have been designated as a national water trail and management planning efforts are underway. This information should be included on page 24 in the federal section.	This information has been added to the discussion of State Parks, Lands, and Trails in Chapter 3.
370	90	Recreation	Support Recreation Activities and Facilities-Strategy 1: Activities in regional parks must be tied to the natural resources of the parks, but not adversely affect them.	Comment noted.
371	90	Recreation	Support Recreation Activities and Facilities-Strategy 4: Bicycle and pedestrian facilities should be coordinated between the Regional Parks System and the transportation system.	Comment noted.

Line ID	Comment ID	Theme	Comment	Response
372	110	Recreation	<p>Page 58: "Land is acquired for the Regional Parks System with the intent that it may eventually be developed in a way that provides for the recreational activities listed above. Adherence to this basic list of activities has served the regional system well over the last 40 years and has helped to fend off efforts to acquire and develop Regional Parks System lands for other ventures." While this statement may be true in general, there are a number of exceptions to this in various well-used parks. This includes playgrounds and play areas, concessionaries (including food), and event and performance space. All of these seem consistent with the guidance to "reasonably will meet the outdoor recreation needs of the people of the metropolitan area." Furthermore, the size of these parks often act as a natural barrier to adjacent land uses, lessening the chance that nuisance land uses have a negative impact on nearby parks. In that light, it is disappointing to see such a small list of uses that should be accommodated in a regional park. Perhaps this isn't meant to be exclusive, but it reads that way. We should be exploring innovative ways to serve all residents of the region. Are there surveys - planned or completed - that provide evidence to support these activities and desires?</p>	<p>Comment noted. In 2016, a visitor study will be conducted in the Regional Parks System that will explore recreation preferences.</p>
373	26	Recreation	<p>We recommend that the section on inline skating also include roller skiing.</p>	<p>Roller skiing has been added to the text of Recreation Activities and Facilities Strategy 1.</p>
374	26	Recreation	<p>The definition of mountain biking should be refreshed. It should reference sustainable design standards, such as those provided by the International Mountain Bicycling Association and a stronger relationship with trail running, snowshoeing and events.</p>	<p>The discussion of mountain biking in Recreation Activities and Facilities Strategy 1 has been revised.</p>

Line ID	Comment ID	Theme	Comment	Response
375	26	Recreation	With regard to night trail use, we recommend that the evaluation of the potential impact to nocturnal wildlife when lighting trails within regional parks, preserves or along a "greenway" type of trail should be included.	The discussion of night use in Recreation Activities and Facilities Strategy 1 has been revised.
376	26	Recreation	We urge the Council to provide more clarity about the types of recreation amenities that are eligible for regional park funds. Specific considerations: picnicking--consider articulating two categories for picnic facilities--small and group--and articulate the amenities that would support each. For example, group areas commonly include play areas, wading pools, swim ponds, open play areas or other family-focused amenities that contribute to an exceptional picnicking experience. Winter recreation--consider more fully articulating the list of winter uses, such as tubing, sledding, snowshoeing and multiple forms of skiing.	Additional language has been added to Recreation Activities and Facilities - Strategy 1. Picnic areas were not reclassified in the plan, however. Given the Council supports picnicing, there is no need to distinguish between the various forms.
377	8	Recreation	Recreation Activities and Facilities Strategy 1. The current policy greatly inhibits a conversation about other types of uses that could draw in diverse users. For example, highly popular foot golf may attract more diversity into our parks. However, these facilities have been developed within golf courses, which are not recognized in the regional system and are not eligible for regional park funding. A simpler example could be a basketball court, which is also not supported under the current policy. While we work hard to differentiate the regional park system from municipal operations - and we support protecting important natural resources - the Plan should allow flexibility for alternative uses that may challenge the concept of compatibility with a traditional natural resource based system if the activity achieves broader goals.	The 2040 Regional Parks Policy Plan expanded the opportunities provided in the Regional Parks System to include "informal ball fields". Council research identified that amenity as the most commonly preferred addition.

Line ID	Comment ID	Theme	Comment	Response
378	7	Recreation	We generally support the following from Chapter 4: the Council and the implementing agencies should encourage recreation based on changing public needs.	Comment noted.
379	131	Research	Suggest increasing the frequency of the park user survey and increasing research on how to connect underserved people to parks.	The 2040 Regional Parks Policy Plan states a commitment to more frequent visitor studies within the Regional Parks System. A statewide survey is tentatively planned to occur in 2016.
380	131	Research	Suggest evaluating projects to see how they worked (or not). For example, there has been a lot of money invested in North Mississippi Regional Park, but has not resulted in a lot of visitors.	Comment noted.
381	130	Research	Findings of the focus group research clearly indicated the need for awareness and availability of parks.	Comment noted.
382	133	Research	Concerned with current methods of data collection. It does not capture true usage, such as large Hmong events that draw over 100,000 people.	Comment noted. The next planned extensive visitor survey done in the Regional Park System has been developed by researchers at the University of Minnesota. Their prescribed methodology will be followed.
383	102	Research	We endorse the principle that targeted studies and research should be undertaken to better understand the public needs and preferences of the Regional Parks System.	Comment noted.
384	11	Research	We request that the Council update the 2008 visitor origin data to understand current use patterns and regional park service areas.	The 2040 Regional Parks Policy Plan states a commitment to more frequent visitor studies within the Regional Parks System. A statewide survey is tentatively planned to occur in 2016.
385	11	Research	We request that the Council update primary service areas for regional facilities, which are currently based on 2008 data, to more accurately determine equity goals.	The primary service areas will be updated after the visitor survey has been implemented in 2016.
386	25	Research	We do not believe that the current methods and metrics used for data collection and measurement capture the diversity of the population that use our parks daily.	Comment noted. The next planned extensive visitor survey done in the Regional Park System has been developed by researchers at the University of Minnesota. Their prescribed methodology will be followed.



Line ID	Comment ID	Theme	Comment	Response
387	25	Research	The City covers 90% of the regional park operating costs through its general fund budget. That's significant funds that go to the day to day use for our diverse populations. In addition to the diversity of daily use, we have large events of cultural significance that take place in our parks as well--the Hmong Sports Festival (estimated attendance over 100,000) and Dragon Boat Festival (estimated attendance 10,000+).	Comment noted.
388	34	Research	We believe that more quantitative data collected and updated on shorter time intervals will give implementing agencies and the Council the most accurate information from which to build a plan and measure progress.	The Council agrees with this statement. The 2040 Regional Parks Policy Plan specifies the visit survey will occur every five years. Historically, it has occurred once every ten years.
389	8	Research	The Plan should clarify visitation data. Page 14 refers to 47 million visitors while page 15 identifies 46 million.	The figures have been updated.
390	110	System Additions	Page 66: Has there been any analysis in gaps or deficiencies in providing for parks based on the forecasted distribution of population across the region?	A comprehensive analysis of the regional parks system to identify service area gaps based on forecasted population was conducted as part of the development of the 2030 Regional Parks Policy Plan. Several regional park search areas and regional trail search corridors were added to the Plan based on this analysis. The total population forecast for 2040 is less than 2% greater than the total population forecast for 2030, therefore a system analysis was not conducted as part of this planning process. The demographic composition of the population is rapidly changing, however, which is why the 2040 Regional Parks Policy Plan focuses on strengthening equitable use of the regional parks system.

Line ID	Comment ID	Theme	Comment	Response
391	110	System Additions	Page 67: "All privately owned parcels within a Council-approved master plan boundary are "inholdings" until they are acquired. Some parcels have homes on them and are called "residential inholdings." The acquisition of inholding parcels - especially those containing homes or those likely to be developed for residential or other urban uses - should be protected by first-right options to purchase, official mapping, life estates or other means. It is imperative that efforts are made to acquire these parcels because every time the land is sold to another private party, the land remains unavailable for Regional Parks System purposes. If once-vacant land is developed for housing or other uses, it may become unreasonably expensive to acquire and is essentially lost to the Regional Parks System." We agree with this statement. The City cannot prevent the redevelopment of these inholdings with non-park uses if there is no public entity with the resources available to acquire sites on a timely basis. This is an especially critical issue for both the Above the Falls Regional Park and portions of the Central Mississippi regional park. We support the Metropolitan Council in creating a more robust acquisition strategy.	The Council implements a Park Acquisition Opportunity Fund to assist regional park implementing agencies with land acquisition. This grant program is comprised of State dollars from the Environment and Natural Resources Trust Fund and the Parks and Trails Legacy Fund; the Council issues bonds to match these funds. Additionally, agencies may seek land acquisition funds through the Council's Regional Parks Capital Improvement Program and the park agency's allocation of Parks and Trails Legacy fund appropriations.
392	19	System Additions	Table 3-7, Master Plan Boundary Adjustments shows an adjustment to the Rice Creek Chain of Lakes Park Reserve of 325 acres. Anoka County requests this be removed from the table. Anoka County will not be requesting an adjustment to the current boundary of Rice Creek Chain of Lakes Park Reserve.	Table 3-7 and Figure 3-8 have been revised to remove the master plan boundary adjustment designation for Rice Creek Chain of Lakes Park Reserve.
393	29	System Plan	Maximize acreage dedicated to regional parks--need more regional parks for the future to support a growing population and preserve open, natural space.	The 2040 Regional Parks Policy Plan includes search areas for 3 regional parks and boundary expansions to 3 existing regional parks based on future population growth and the need to preserve open space and high quality natural resources.

Line ID	Comment ID	Theme	Comment	Response
394	110	System Plan	<p>Page 67: "The Council, with the advice of the Metropolitan Parks and Open Space Commission, will work with regional park implementing agencies to systematically review inholding parcels that have been developed to determine whether the land is essential to protect the natural resources that define the park." How and when will this be conducted? Is there a methodology developed? Who will make the final determination on what parcels to include? How can this be conducted <i>before</i> inholdings parcels are developed (instead of after)?</p>	<p>The review of inholding parcels is done on an as-needed basis, usually during the development or review of a master plan. The Council, with the advice of the Metropolitan Parks and Open Space Commission, reviews master plans and determines the inclusion of lands within a regional park boundary. This process can be conducted before inholdings are developed, but the basis for this strategy is to ensure that regional parks funding for acquisition is used in an efficient manner.</p>
395	110	System Plan	<p>Page 84: Concerning the passage, "Reimbursement will be considered for early acquisition of land that is not currently designated as regional recreation open space by the Council in the 2040 Regional Parks Policy Plan under certain conditions." Another condition might be that the jurisdiction in which this site is located has guided the site for park or recreational use in their comprehensive plan, or is in the process of amending their comprehensive plan to make this designation.</p>	<p>This strategy in the 2040 Regional Parks Policy Plan acknowledges the rare instances where a regional park implementing agency may be in the process of seeking inclusion of parkland into the Regional Parks System and has a time-sensitive opportunity to purchase land for the park that would be lost if they had to wait for the Council's Policy Plan to be amended. If the Council's Policy Plan had not yet acknowledged the property as future parkland, it is highly unlikely that the local jurisdiction's comprehensive plan would have guided the property for park or recreational use. An amendment to a local comprehensive plan to acknowledge regional parkland usually follows the Council amending its Regional Parks Policy Plan and issuing local system statements. Adding the suggested condition to this strategy would place an undue burden to a time sensitive acquisition.</p>

Line ID	Comment ID	Theme	Comment	Response
396	14, 15, 16, 20, 22, 53, 55, 75, 89, 125	System Plan	Request that the Council include Three Rivers Park District's proposed regional trail system in its entirety in the 2040 Regional Parks Policy Plan.	As part of the development of the 2040 Regional Parks Policy Plan, Council staff reviewed the Three Rivers Park District proposed regional trail system. The proposed regional trails were analyzed based on the requirements for regional trails outlined in the Regional Parks Policy Plan, including a look at regional balance and regional importance. Approximately 101 miles of proposed regional trails were found to meet the criteria and were recommended to be added to the Regional Parks System as part of the 2040 Regional Parks Policy Plan.
397	12	System Plan	It would be good to know whether or not long range plans for the Southwest Dakota County Regional Park Search Area still exist.	The 2030 Regional Parks Policy Plan indicated that the Southwest Dakota County Regional Park Search Area was subject to the outcome of the Dakota County Park System Plan. The County completed an extensive planning process to develop the County System Plan; the regional park search area was not a component of the plan. The Met Council updated the 2030 Regional Parks Policy Plan in 2010 and removed the regional park search area from the Regional Parks System.
398	12	System Plan	Page 50 of the Plan identifies a regional trail search corridor that bisects Elko New Market in an east-west fashion. Assuming trail construction will be a collaborative effort, the City is interested in knowing what implementation steps are recommended.	Regional trail search corridors depict the general recommended connections that a future regional trail should make within the regional parks system. The alignment of a trail is identified through a master planning process. Scott County will develop a master plan for the regional trail in the future and will include Elko New Market in the planning process. After the Council has approved the regional trail master plan, Scott County will be eligible to seek regional funding for acquisition and development of the trail.

Line ID	Comment ID	Theme	Comment	Response
399	89	System Plan	System includes expanding it to 70,000 acres and tripling the trail miles from 340 today to more than 1,100 miles by 2040." This statement should include the existing system acreage as a baseline to fully understand what this goal entails.	This statement has been revised to read: "...the vision for the Regional Parks System includes expanding parkland from 54,000 to almost 70,000 acres and tripling the trail miles from 340 today to more than 1,100 miles by 2040."
400	127	System Plan	There should be another regional park on Lake Minnetonka.	The regional parks system includes 2 parks on Lake Minnetonka and an additional 5 regional parks, park reserves and special recreation features within a 2 mile radius of the lake. Regional trails are located on both the north and the south side of the lake, and the 2040 Regional Parks Policy Plan identifies 2 regional trail search corridors to provide connections between the existing trails. Regional park service area analysis shows that the Lake Minnetonka communities are currently well served by the regional parks system.
401	59	System Plan	Support efforts to expand the parks system to provide additional recreation opportunities for the growing population.	Comment noted.
402	8	System Plan	Pages 45-56. We have not proposed any boundary adjustments, additions, or deletions for the Plan. When the County completed its 2030 Comprehensive Plan, we undertook significant public engagement and analysis for the existing park and trail system plan. We anticipate having some conversation about boundary adjustments and search areas in the 2040 comprehensive planning process. Although we don't anticipate significant changes, we do ask for the ability for changes to be considered at a future date.	Changes to the Regional Parks Policy Plan, including the addition or deletion of a regional parks system unit, can be considered during a periodic update of the Regional Parks Policy Plan, or may be considered as an amendment to the plan. The Council is required to comprehensively review the Regional Parks Policy Plan every four years and update the plan, if necessary. Amendments may occur outside of the comprehensive review and update process. Chapter 6: Management Procedures describes the criteria and process for amending and updating the Regional Parks Policy Plan.

Line ID	Comment ID	Theme	Comment	Response
403	86	System Plan	As one clarion example of the consequences of ignoring this expertise, only portions of our 2040 conceptual regional trail network were included in the system plan of the 2040 Regional Parks Policy Plan. Most significantly, our planned regional trail through the racially diverse communities of Brooklyn Center and Brooklyn Park was eliminated, an action contrary to the equity principles of the Regional Parks Policy Plan. This ill-conceived decision ignored our year-long planning process involving more than 2,700 citizens, dozens of meetings with stakeholders, and our coordinated effort with Hennepin County to ensure the two trail systems would complement each other.	The Council appreciates the planning process that Hennepin County and Three Rivers Park District conducted to develop their bicycle plan. Council staff reviewed the proposed regional trail corridors based on the requirements for regional trails outlined in the 2030 Regional Parks Policy Plan, including a look at regional balance and regional importance. Approximately 101 miles of proposed regional trails were found to meet the criteria and were recommended to be added to the Regional Parks System as part of the 2040 Regional Parks Policy Plan. Proximity to racially diverse communities is not a factor in the determination whether a trail should be considered regional.
404	110	System Protection	Page 89: Concerning the passage, "System Protection - Strategy 1: Local comprehensive plans may need to be changed if planned land uses would have a negative impact on current or planned regional park lands or facilities." This section generally lacks definition for what constitutes a negative impact. There is a high probability that these decisions could be arbitrary if metrics are not developed and adopted as part of this process.	The Council will review local comprehensive plans based in the 2040 Regional Parks Policy Plan. In the situation in which the comprehensive plan is determined to have a negative impact on the Regional Parks System, the Council will first negotiate with the community to try to find a solution that still conforms to the Policy Plan and meets local objectives. In the rare event in which these discussions are not successful, the Council retains its authority under state statute to require a community to modify its plan. As a long-term, high-level policy document, the 2040 Regional Parks Policy Plan cannot foresee and describe every specific instance of significant impacts on the Regional Parks System.

Line ID	Comment ID	Theme	Comment	Response
405	110	System Protection	<p>Pages 89-90: What safety issues need to be considered? Does this refer to public safety or traffic safety? And if there is excessive noise, air, or water pollution, we should most certainly be regulating that in other ways besides through the regional parks plan (for instance, through the water plan and through MPCA led enforcement).</p>	<p>In the context of determining projects that represent a substantial departure from the 2040 Regional Parks Policy Plan or impacts on the Regional Parks System, the context of a proposed project or plan that impacts the safety of the Regional Parks System users will be evaluated by the Council. As a long-term, high-level policy document, the Policy Plan cannot foresee and describe every specific instance of impacts on the Regional Parks System. In the situation in which the comprehensive plan is determined to have a negative impact on the Regional Parks System, the Council will first negotiate with the community to try to find a solution that still conforms to the Policy Plan and meets local objectives. In the rare event in which these discussions are not successful, the Council retains its authority under state statute to require a community to modify its plan.</p>
406	110	System Protection	<p>Page 90: "A project that is consistent with a Council-approved local comprehensive plan is exempt from metropolitan significance reviews for metropolitan system effects." This language appears inconsistent to statements made on the previous pages. The strategy states: "Local comprehensive plans may need to be changed if planned land uses would have a negative impact on current or planned regional park lands or facilities." However, here it says the project won't be reviewed if it's consistent with a local comprehensive plan. The document needs to be clarified in this regard.</p>	<p>This language comes directly from Minn. Administrative Rules 5800.040 and 5800.050. The Council has the authority to require proposed comprehensive plans to be changed if they would have a negative impact on the Regional Parks System. Once the Council has authorized a comprehensive plan to be put into effect, a project that is consistent with that comprehensive plan is exempt from metropolitan significance reviews.</p>

Line ID	Comment ID	Theme	Comment	Response
407	101	System Protection	Pg. 89 System Protection – Strategy 1 states, “Local comprehensive plans may need to be changed if planned land uses would have a negative impact on current or planned regional park lands or facilities.” We agree that local land use surrounding existing and planned regional park lands should be compatible with the preservation purposes of regional parks. To advance this goal while minimizing conflicts with local communities, particularly in the case of planned regional parks, we encourage the Council to acknowledge in this strategy that identification of planned regional parks and trail corridors should be done in collaboration with implementing agencies and with the involvement of impacted local communities.	The 2040 Regional Parks Policy Plan requires that regional park implementing agencies include local communities in the development of a regional park or trail master plan. System Protection - Strategy 1 is applicable once a regional park or trail master plan has been approved by the Council.
408	110	Trails	Page 64: The City encourages including language about how the parks plan works with the regional bike plan. The narrative here is just a description of the bike plan; it would be helpful to know how other regional policies, for instance in the TPP, will support the desires outlined in the parks plan.	Additional discussion has been added to this section of the 2040 Regional Parks Policy Plan.
409	110	Trails	Page 8: Consider acknowledging the importance of the trail system as part of the transportation network (as outlined in the Transportation Policy Plan). "Connecting communities" seems to understate the role the trail system plays in the regional transportation network.	The text in this section is a direct quote from Thrive MSP 2040, which was adopted by the Council in May 2014. The relationship between the regional trail system and the transportation network is discussed in Chapter 4.
410	110	Trails	Page 28: More clarity is needed on how the plan distinguishes the difference between local and regional trail facilities. It states that local facilities are contained within a single jurisdiction, but this is true for many links of the regional trail network as well. Also, from the way the chart is put together, it appears that parkways are classified as local and county only, not part of the regional system - although they are part of the regional system in many places.	Additional information on what constitutes a regional trail can be found in Siting and Acquisition Strategy 3 in Chapter 4 of the 2040 Regional Parks Policy Plan. Parkway streets travel through regional parks and are adjacent to regional trail corridors, but are not considered a component of the Regional Parks System.



Line ID	Comment ID	Theme	Comment	Response
411	110	Trails	Page 36: "The regional trail network, especially in the urban areas, serves as commuting routes for bicyclists in addition to serving recreational purposes." This section should cross reference the Transportation Policy Plan's directive to build a regional bicycle network for transportation.	The focus of Chapter 3: System Plan is to describe the components of the Regional Parks System, both existing and planned. Some portions of the regional bicycle transportation network are part of the Regional Parks System, but not all. In order to avoid confusion regarding this distinction, the relationship between the regional trail network and the regional bicycle network is described in Chapter 4 under the Strategy that bicycle and pedestrian facilities should be coordinated between the Regional Parks System and the transportation system.
412	110	Trails	Page 36: "However, trail users are traveling from one city or county to another. It is this inter-jurisdictional trail length that makes these trails regionally significant." Is this really the case? Is there data about how trail users are traveling on these corridors in terms of distance and whether or not they cross jurisdictional lines? Perhaps this just needs rephrasing for clarity. It seems jurisdictional boundaries are likely not the defining characteristic that you are intending to highlight, rather, it is the trip-length and purpose that are important.	In the definition of regional recreation open space, Minn. Stat. 473.121 directs the Council to determine land and facilities that are of regional importance. The foundation of regional importance in the 2040 Regional Parks Policy Plan comes from serving a "regional audience" and is taken into consideration in the distribution of regional parks funding. Serving a regional audience is defined by non-local visits--the number of visits a park agency hosts from people who live outside of its jurisdiction. In the context of regional trails, it is appropriate to evaluate a trail's connections between jurisdictions to ensure that a trail is of regional importance.

Line ID	Comment ID	Theme	Comment	Response
413	110	Trails	<p>Page 42: Staff reiterates comments submitted for the TPP in that there is some concern that investments already made in the regional trail system within the City limits may result in future instances of non-competitiveness for grant funds for trails. This may be a problem when considering where the need is for these facilities regionally, particularly in light of the equity goal.</p>	<p>Grants for regional trails using regional parks funding are not competitive in nature. Each park implementing agency receives an allocation of the Regional Parks Capital Improvement Program and Parks and Trails Legacy Funds. The park agencies determine which projects these funds are used for. In general and as applies to federal transportation funding rules, existing facility reconstruction projects are eligible for regionally-allocated federal transportation funds if they are replacing a facility at the end of its useful life or include improvements to meet ADA requirements, or safety or other deficiencies. Resurfacing of a facility is eligible only if other improvements to remove a facility deficiency are included in the proposed project.</p>
414	110	Trails	<p>Page 43: Above the Falls Regional Park will also include a regional trail facility, linking to other regional trails. Is this assumed, although not called out separately here? Staff recommends adding these trails to the list for clarity. Otherwise it would be helpful to clarify in the document text that regional parks containing trails, such as those proposed on the upper riverfront, are adequately identified in the document through their inclusion in the regional park's master plan.</p>	<p>Above the Falls Regional Park will include a trail, but the trail within the regional park is not a stand alone regional trail corridor.</p>
415	110	Trails	<p>Page 48: This table should also call out Main Street/East River Parkway potential regional trail connection in the Central Mississippi Regional Park area. Page 48: Are these planned investments consistent with the Regional Bike Plan?</p>	<p>The potential Main Street/East River Parkway trail is not included in Table 3-9 because it is a planned trail within Central Mississippi Regional Park and is not a stand-alone regional trail search corridor. Regional trails that provide direct transportation connections to and between regional destinations, as identified in the Regional Bicycle System Study, were included in the Regional Bicycle Transportation Network in the 2040 Transportation Policy Plan.</p>

Line ID	Comment ID	Theme	Comment	Response
416	110	Trails	Page 63: "Encourage regional park and trail design that conforms to changing recreational preferences" This definition should also include trail extensions and improvements in underserved areas, to provide better linkages to regional parks.	The section cited in the comment refers to strategies to meet the Recreation Activities and Facilities policy. The criteria for the designation of new regional trails is located in Siting and Acquisition -Strategy 3.
417	110	Trails	Page 68: There needs to be more clarity on what it means to "not duplicate an existing trail." Especially in urban areas, there is sometimes a need for multiple parallel facilities because they serve different purposes - for instance, on-street commuting routes and off-street recreational routes.	In determining which trails qualify for regional status, the Council evaluates each proposal based on its specific geographic context and applicable trail purposes. The Council understands that there are instances where an on-street bicycle lane and an off-street recreational trail are desirable.
418	110	Trails	Page 69: Regarding the 1.5 mile separation between parallel regional trails: there is concern this standard could be too limiting in busy areas. Examples: riverfront trails along both banks are much closer than this; and sometimes there are separate trail facilities for both bicycle and pedestrian users.	The 2040 Regional Parks Policy Plan states that parallel trails that are not separated by natural or human-built barriers should be at least 1.5 miles apart. Trails on both sides of a river are separated by a natural barrier; therefore, the 1.5 mile separation requirement is not applicable. Separate trail facilities for bicycle and pedestrian users may be developed within the same regional trail corridor.
419	110	Trails	Page 69: The language in this section seems to express a very suburban or exurban focused value. Regional trails through the central cities can be valuable in other ways, if not for their relationship to natural resources. If urban trails cannot be considered for the regional system because of their surrounding land uses, many options would be off the table for effectively connecting large portions of the region's population to the regional park system.	The 2040 Regional Parks Policy Plan does not preclude the identification of regional trails within the urban area and recognizes linking regional trails as an option. Since the Regional Parks System is a nature-based system, the Policy Plan encourages linking regional trails to maximize inclusion of high-quality natural resources, whenever possible.

Line ID	Comment ID	Theme	Comment	Response
420	110	Trails	Page 69: It might be appropriate to describe the physical nature of the trails themselves as well as the type of users that they will accommodate.	The text on page 69 supports and describes the Siting and Acquisition Strategy for regional trails. A description of the types of users the trails will accommodate is located under Recreation Activities and Facilities Strategy 4. The 2040 Regional Parks Policy Plan does not include design standards or requirements of the physical nature of the trail, as this a local decision made by the regional park implementing agency.
421	101	Trails	Pg. 81 states, "Regional park implementing agencies are encouraged to negotiate with local communities and landowners to provide fencing or vegetative screening to meet safety and local community concerns." The Council should clarify whether this applies to new or existing trails, or both.	This section has been clarified to read: "fencing and screening <i>along new or existing trails</i> may be grant-eligible development costs."
422	12	Trails	The Elko New Market Trail Plan identifies potential regional trail routes along the MinnCan Pipeline and Cap X routes. It does not appear that these routes are referenced in the draft Plan.	The 2040 Regional Parks Policy Plan identifies a regional trail search corridor through Elko New Market. The alignment of a trail will be identified through a master planning process. Scott County will develop a master plan for the regional trail in the future and will include Elko New Market in the planning process.
423	89	Trails	The Plan should indicate how many miles of trails have been created from abandoned railroad corridors. The Plan should better highlight the creative partnerships between land owners, regional rail authorities and park agencies in developing the regional trail system.	A discussion of regional trails on abandoned railroad corridors has been added to Chapter 3 of the 2040 Regional Parks Policy Plan.
424	89	Trails	The Plan should include a goal to site regional trail alignments to provide access to and preserve recognized ecologically significant natural areas.	Siting and Acquisition Strategy 3 in the 2040 Regional Parks Policy Plan discusses the goal of incorporating natural resources into a regional trail corridor and how restoration and management practices can enhance these areas.

Line ID	Comment ID	Theme	Comment	Response
425	44, 45, 46, 47, 48, 50, 51, 56, 58, 60, 61, 62, 64, 67, 72, 74, 79, 81, 82, 83, 85, 87, 88, 92, 93, 94, 98	Trails	The Plan should make a distinction between paved trails intended for recreational versus transportation use.	The 2040 Regional Parks Policy Plan indicates that regional trails are intended to be multi-use recreation trails, although some regional trails also serve bicycle commuter functions.
426	44, 45, 46, 47, 48, 50, 51, 56, 58, 60, 61, 62, 63, 64, 67, 72, 74, 76, 79, 81, 82, 83, 85, 87, 88, 92, 93, 94, 96, 98	Trails	Trails within parks should serve a recreational function, not transportation.	Comment noted. The 2040 Regional Parks Policy plan indicates that trails in the regional system are primarily intended to be multi-use recreation trails.
427	62, 63, 98, 99	Trails	Regional parks and recreation areas should not be extensions of the transportation system.	Comment noted.
428	14, 16, 22, 53, 55, 75, 125	Trails	Three Rivers' 2040 Regional Trail Plan is complementary to the City's comprehensive plan, trail plan and existing and planned trail infrastructure.	Comment noted.
429	14, 15, 16, 22, 53, 55, 75, 125	Trails	Regional trails are vital components to making our communities and greater region healthy and desirable places to live, work and play.	The Council agrees with this statement.
430	14, 15, 16, 22, 55, 75, 125	Trails	Regional trails are also uniquely positioned to provide new regional recreation opportunities within fully developed communities where existing regional recreation opportunities may not exist.	The Council agrees that trails are important to providing recreation opportunities within fully developed communities. In order to be considered "regional", the trails must meet the criteria identified in the Regional Parks Policy Plan for the designation of regional trails.

Line ID	Comment ID	Theme	Comment	Response
431	14, 15, 16, 22, 55, 75, 125	Trails	Three Rivers' 2040 Regional Trail Plan is one of the results of 18 month planning process with Hennepin County to update the countywide Bike Plan. This process included a large interactive workshop, 2 open houses, an online survey, an online wiki map, 10 listening sessions with targeted populations that are underrepresented on the regional trail system and greater bicycle network, and participation by over 2,700 community members. The process provided an opportunity for cities, agencies, advocacy groups, and similar to participate on a project advisory group which provided guidance and oversight throughout the entire planning process.	The Council appreciates the planning process that went into the development of the Hennepin County/Three Rivers Bicycle Plan and would have welcomed discussions during the process on the Council's requirements for the designation of regional trails.
432	14, 15, 16, 22, 55, 75, 125	Trails	Inclusion of the Three Rivers' 2040 Regional Trail System within the Plan a) helps coordinate regional trail planning with local comprehensive plans being developed by communities in 2016-2018; b) is a requirement for consideration of approval of regional trail master plans as well as several regional, state and federal trail development funding opportunities; c) results in a comprehensive regional trail system that removes significant physical barriers such as interstates and rivers; accounts for truncated service areas of many regional trail corridors as a result of the motorized transportation system, removes large gaps in the regional trail system service area coverage, and provides direct connections and access to racially concentrated areas of poverty; and d) creates a visionary regional trail system that serves both recreation and non-transportation purposes and serves the needs of Suburban Hennepin County residents and the greater region through 2040.	The Council appreciates the planning and vision that informed the development of Three Rivers Park District's proposed regional trail plan. The Council added the 101 miles of proposed trails that met the required criteria for regional trail designation to the 2040 Regional Parks Policy Plan.

Line ID	Comment ID	Theme	Comment	Response
433	20	Trails	Three Rivers Park District has lead a thorough and outstanding planning process that has produced a plan to reduce significant barriers and large gaps in the regional trail system coverage area. The Park District's plan in its entirety better connects the trail system to the City of Richfield and other racially concentrated and low income areas.	The Council appreciates the planning process that Hennepin County and Three Rivers Park District conducted to develop their bicycle plan. Council staff reviewed the proposed regional trail corridors based on the requirements for regional trails outlined in the 2030 Regional Parks Policy Plan, including a look at regional balance and regional importance. Approximately 101 miles of proposed regional trails were found to meet the criteria and were recommended to be added to the Regional Parks System as part of the 2040 Regional Parks Policy Plan. Proximity to racially diverse communities is not a criteria in the determination whether a trail should be considered regional.
434	20	Trails	The Three Rivers' 2040 Regional Trail System helps create a visionary trail system that serves both recreation and non-transportation purposes and it is appropriate to consider both uses within the 2040 Regional Parks Policy Plan. Doing so will give us the edge in obtaining state, federal and other outside funding.	The Council appreciates the planning process that Hennepin County and Three Rivers Park District conducted to develop their bicycle plan. Council staff reviewed the proposed regional trail corridors based on the requirements for regional trails outlined in the 2030 Regional Parks Policy Plan, including a look at regional balance and regional importance. As the fiscal agent for regional parks funding, the Council is obligated to ensure that ensure that these amenities are regionally significant and regionally balanced, rather than solely serving a local audience.
435	20	Trails	Cities, counties, and state agencies across Minnesota all have made great strides in building an infrastructure and environment that offers more options to link destinations across borders. We are building momentum in creating safer options along roads for both recreation and commuting that is truly making our communities healthy and desirable places to live, work and play. Including the complete regional trail network recommended by Three Rivers will help keep this momentum going.	The Council agrees that infrastructure improvements for recreation and commuting purposes create healthy and desirable communities. The Council added the 101 miles of trails proposed by Three Rivers Park District that met the criteria for designation as a regional trail to the Regional Parks System in the 2040 Regional Parks Policy Plan. In addition to regional trails, local trails are a key component to vibrant communities.

Line ID	Comment ID	Theme	Comment	Response
436	53	Trails	Encourage the Council to consider the long standing successful and cooperative relationships Three Rivers has fostered with the City and other local agencies in the development of their commendable trail network.	The Council appreciates its partnership with Three Rivers Park District as well the relationship Three Rivers has fostered with local communities. These relationships are critical to successfully implement the Regional Parks Policy Plan.
437	53	Trails	The City was recently selected by Money Magazine as the #2 city in the nation. Many of the mentioned highlights for this honor include the widespread and accessible park and trail system. Three Rivers regional trails are the backbone of the trail network in the City and have greatly contributed to the livable quality of the community.	The Council agrees with this statement. Local and regional parks are key to the livability of the Twin Cities region.
438	137	Trails	Some of Three Rivers Park District proposed regional trails go through racially concentrated areas of poverty.	Comment noted. Proximity to racially concentrated areas of poverty is not a part of the criteria outlined in the 2030 Regional Parks Policy Plan to determine whether a trail should be designated as regional.
439	103	Trails	The 2040 Regional Parks Policy Plan should reflect that linking regional trails should be a priority throughout the region, and as such are designated both inside and outside the Metropolitan Urban Service Area (MUSA)--to connect our population centers with regional park and trail facilities outside the MUSA.	The Council understands that there are instances where linking regional trails are appropriate outside of the Metropolitan Urban Service Area (MUSA). However, linking regional trails are a priority within the MUSA, since this is where more than 90% of the region's population lives. Siting and Acquisition Strategy 3 has been revised to clarify this point.
440	100	Trails	Figures 3-4 and 3-7 show a noticeable lack of existing and proposed regional trails between the east side of St. Paul and the St. Croix Valley. The search areas map show some possible connections. Policy would hopefully place a higher priority on possible corridors that fill these gaps, especially when the trail would serve large and diverse populations. Can more carrots be provided to create the connections that are lacking? For example, micro grants could be offered to support parks and trail efforts of marginalized groups.	Figure 3-9 shows regional trail search corridors, which identify desired trail connections. There are several regional trail search corridors identified in the eastern portion of the region. Once a regional park implementing agency has identified a trail alignment and the Council approves a master plan for a regional trail, the implementing agency is eligible to receive regional parks system funding to acquire land and develop the trail.



Line ID	Comment ID	Theme	Comment	Response
441	103	Trails	The Regional Bicycle Transportation Network should be revised to add the Brown's Creek State Trail and the Central Greenway Regional Trail and elevate the rail corridor from St. Paul to North Branch as a Tier 1 alignment.	Comment noted. The designation of corridors on the Regional Bicycle Transportation Network in the Transportation Policy Plan is outside of the purview of the 2040 Regional Parks Policy Plan.
442	110	Trails	Page 16: This plan should reference the directive in the Transportation Policy Plan to create a regional bicycle network, which is more about transportation than recreation. It overlaps with and complements the recreational trails identified here. Many of the trails within the Regional Park Systems are used actively for regional home-work commuting (as opposed to only being used for recreation).	Chapter 2 of the 2040 Regional Parks Policy Plan contains a broad overview of the Regional Parks System and its elements. Regional trails are intended to serve a multi-use recreation function, although some regional trails also serve a bicycle transportation and commuting function. Some regional trails are components of the Regional Bicycle Transportation Network (RBTN) as identified in the 2040 Transportation Policy Plan. Discussion of this overlap is located in Recreation Activities and Facilities - Strategy 4, within Chapter 4.
443	11	Trails	We request that the Council more explicitly and clearly explain the goals of the Regional Bicycle Transportation Network, particularly how the RBTN and the regional trail system work together or compete with each other for implementation.	The goal of the RBTN is to establish an integrated seamless network of on-street bikeways and off-road trails to most effectively improve conditions for bicycle transportation at the regional level and to encourage planning and implementation of future bikeways by cities, counties, parks agencies, and the state, in support of the RBTN vision as shown in Figure G-1 of the 2040 Transportation Policy Plan. The role of regional trails in connecting to and between regional destinations, as identified in the Regional Bicycle System Study, was assessed and as a result, many regional trails were identified as important components of the RBTN. In practice, the RBTN, the regional trail system, and all local trail and bikeway networks will complement one another to serve the overall bicycle transportation and recreation needs of the region.

Line ID	Comment ID	Theme	Comment	Response
444	11	Trails	What is the minimum design standard for trails and other routes identified on the RBTN?	The RBTN is part of the Transportation Policy Plan (TPP), which provides policies, guidelines, and references to best practices in developing on and off-road bicycle facilities. A range of potential facility treatments for on-street regional bikeways is provided in the Bicycle Pedestrian Investment Direction section of the TPP. The lowest level of bicycle facility that would meet regional function is wide paved shoulders. Design standards can be found in the guides referenced on page 269 of the draft TPP.
445	11	Trails	What are the Council's strategies for investing in the Regional Bicycle Transportation Network (RBTN) and how does that compare to regional trails that are not identified in the RBTN?	There is no dedicated funding for bicycle system improvements for the RBTN. Current state and regionally-allocated federal transportation funds, along with local funds, will continue to be the base funds for the system. All regional trails that serve transportation purposes are eligible for regionally-allocated federal transportation funds that are administered by the Transportation Advisory Board. Regional trails that are identified on the RBTN will receive prioritization points corresponding to Tier 1 (highest priority) and Tier 2 (secondary priority) designations in the RBTN through the Regional Solicitation process. Regional trails with Council-approved master plans are eligible for funding through the Council's Park Acquisition Opportunity Fund and Regional Parks Capital Improvement Program, as well as Parks and Trails Legacy Funds.

Line ID	Comment ID	Theme	Comment	Response
446	26	Trails	Ensure that the definitions and categories for regional trails are consistent throughout the document. There seems to be some variation in text within the Recreation Activities and Facilities Strategy 4 with other sections that discuss trails. Furthermore, the description of who the trails are intended to serve may benefit from using a standard classification of cycling ability or types.	A description of linking and greenway or destination regional trails has been added to Recreation Activities and Facilities Strategy 4. The Regional Parks Policy Plan does not incorporate the standard bicyclist classification (A,B,C) since a bicyclist may have different needs and purposes at different times. The intent was to show the types of facilities and user groups served by the regional trail system.
447	26	Trails	The development of Destination Regional Trails or Greenways should include the ability to re-create natural features, especially in urban environments where current land use may have removed the original natural resource. This will be critical to providing equity and supporting the ecological function of a region.	The discussion of Destination Regional Trails or Greenways under Siting and Acquisition Strategy 3 of the 2040 Regional Parks Policy Plan has been updated to include the ability to re-create natural resource features.
448	7	Trails	The 2040 Regional Parks Policy Plan states it is important that the regional trails and trails within the Council's Transportation Policy Plan (TPP) work together and are integrated with other transportation modes. The philosophy behind creating a Regional Bicycle Transportation Network (RTBN) is sound, but the exclusion of regional trails from the RTBN is not. Regional trails within the Metropolitan Urban Service Area (MUSA) should be added to the proposed "Tier 1" RTBN. The regional trail corridors are parallel to RBTN corridors and provide the same transportation outcomes and traverse the same barriers with separated river and road crossings. In nearly all cases, regional trails are integrated into the transportation network and bring higher public value by accommodating both transportation and recreation services.	The Regional Bicycle Transportation Network was developed from a Regional Bicycle System Study that defined a two-tiered network for planning and implementation. The Tier 1 (high priority) network was identified where bicycle travel was greatest, population and job densities were highest, and where there were the most opportunities to connect regional job concentrations and activity centers with population centers and the regional transit system. Based on these criteria, the Tier 1 network coverage area corresponds favorably with the Metropolitan Urban Service Area. Those regional trails that provide direct transportation connections to and between regional destinations, as identified in the Regional Bicycle System Study, are included in the Tier 1 network.

Line ID	Comment ID	Theme	Comment	Response
449	7	Trails	The Regional Solicitation proposes to establish a RBTN (Regional Bicycle Transportation Network) that will be used to prioritize regional bicycle funding. As proposed, fully 200 points or 20% of the scoring criteria are awarded for projects within RBTN corridors. Under this scenario, it will be very difficult if not impossible for regional trails outside of RBTN corridors to receive federal Transportation Alternative Program funds. Designating regional trails within the MUSA, as "Tier 1" will allow equitable access to grant funds and remove the 20% penalty.	The Regional Solicitation process to allocate federal transportation funds for the region is developed and administered by the Transportation Advisory Board which includes, among others, Commissioners from each of the seven metro counties. The Regional Bicycle Transportation Network was developed from a Regional Bicycle System Study that defined a two-tiered network for planning and implementation. The Tier 1 (high priority) network was identified where bicycle travel was greatest, population and job densities were highest, and where there were the most opportunities to connect regional job concentrations and activity centers with population centers and the regional transit system. Based on these criteria, the Tier 1 network coverage area corresponds favorably with the Metropolitan Urban Service Area. Those regional trails that provide direct transportation connections to and between regional destinations, as identified in the Regional Bicycle System Study, are included in the Tier 1 network.
450	7	Trails	The Regional Solicitation scoring matrix is not regionally balanced, resulting in a built-in advantage to the urban core. Regional trails within the MUSA should be added to the proposed "Tier 1" RBTN and equity scoring criteria should be considered regionally.	The Regional Solicitation for Federal transportation funding is outside of the purview of the 2040 Regional Parks Policy Plan. These comments have been forwarded to the Council's transportation planning staff.
451	7	Trails	The Regional Solicitation includes language and scoring criteria (mentioned above) derived from the draft TPP prior to the completion of the public comment period and adoption of the Plan. Without further clarity in reasoning, it appears the Council has a flawed process and predetermined outcomes.	The Regional Solicitation scoring criteria were developed by the Transportation Advisory Board prior to release of the draft TPP for public comment.

Line ID	Comment ID	Theme	Comment	Response
452	110	Trails	How do planned investments in the trail system meet the goals of Thrive?	The regional trails can help the Council meet the Thrive MSP 2040 outcomes of Stewardship, Equity, Livability, and Sustainability through protecting natural resources, creating choices for all residents to recreate, and providing access to nature and outdoor recreation.
453	110	Trails	Table 3-10 covers the system/geographic links that are made, but nothing about their programmatic elements - or how they might address issues such as equity and access.	Minn. Stat. 473.147 requires the Council to generally identify areas that should be acquired by a public agency for the regional recreation open space system. Regional park implementing agencies plan and program the regional parks and trails.
454	110	Trails	Please clarify that the numbers on the map correspond to the list of trail corridors on the previous page. Page 53 as well.	These clarifications have been made in the 2040 Regional Parks Policy Plan.
455	110	Trails	Page 49/50: Areas identified on this map should be accompanied by an extensive narrative explaining how investment in the regional park system in these locations will address system needs, particularly in light of the goals identified in Thrive. Alternatively, standards could be outlined in this document that highlights how a regional park master plan might answer those questions.	This comment is in reference to the Regional Trail Search Corridors that were identified in the 2030 Regional Parks Policy Plan and preceding Policy Plans dating back to the 1990s. These system additions were evaluated under the governing criteria at the time. However, the regional trails can help the Council meet the Thrive MSP 2040 outcomes of Stewardship, Equity, Livability, and Sustainability through protecting natural resources, creating choices for all residents to recreate, and providing access to nature and outdoor recreation.

Line ID	Comment ID	Theme	Comment	Response
456	110	Transportation	<p>In the City's comments on Thrive MSP 2040 and the Transportation Policy Plan (TPP), we asked the Council to acknowledge the tension that can arise between the Council's systems of Transportation and Regional Parks. The Minneapolis Chain of Lakes was the most visited of the regional parks in 2013 and is also an area that experiences significant impacts from aviation. The Council has a role in the long term planning for airports, and also has the duty to protect the regional parks. Excess noise, traffic and air pollution are all clearly identified in the System Protection Policy as the kind of impacts or substantial departures from the Regional Parks Plan that may require local governments to modify their comprehensive plans. In our comments on the TPP we asked the Council to better acknowledge and assess these impacts, particularly when reviewing airport comprehensive plans; and to develop expectations for airports regarding the prevention, reduction, and mitigation of airport impacts. Our concerns about the negative impacts that can come from transportation are not limited to the area of aviation, and we look forward to an ongoing partnership with the Met Council to minimize and manage impacts on regional parks from other forms of transportation. However, aviation is an area where we think that current practices could be much more robust.</p>	<p>Thrive MSP 2040 acknowledges these system tensions. This regional framework document explains on p.16, that ... "Plans, policies, and projects that balance all five of these outcomes will create positive change, while efforts that advance only one or two at the expense of the others may fall short over the long term. Policymakers make tough decisions at the intersections of these five outcomes, weighing the benefits and costs of their options against these five outcomes." The outcomes that this passage is referring to are the 5 outcomes from Thrive MSP 2040, Stewardship, Prosperity, Equity, Livability, Sustainability.</p>

Line ID	Comment ID	Theme	Comment	Response
457	140	Transportation	Council should provide and promote transit access to all of our regional parks	The 2040 Transportation Policy Plan has identified 5 Transit Market Areas in the region to use as a tool to guide transit planning decisions. Population and employment density are strong indicators for transit demand. Since the Regional Parks System is a nature-based system, many regional parks and park reserves are located in Transit Market Areas that do not support fixed route transit service. Transit is currently provided to some regional parks, mainly in the urban centers. Future light rail transitway extensions will improve access to regional parks and trails in Hennepin County. Planning Strategy 2 in the 2040 Regional Parks Policy Plan indicates that the Council will collaborate with Metro Transit or local transit providers to determine the feasibility of adding transit stops that are convenient to regional parks and trails.
458	39	Transportation	Metro Transit should bear the responsibility of getting visitors to Como Park, rather than it being the responsibility of the City of Saint Paul	Metro Transit Route 3, which travels between downtown Minneapolis and downtown St. Paul and Route 83, which travels between St. Paul and Roseville and includes a connection to the Green Line LRT, provide bus access to Como Regional Park for those visitors who choose to take transit.
459	110	Transportation	Page 13: This would be a great place to also note the work done on the Regional Bicycle Plan.	Text has been added to this section to encourage local communities to plan for their portions of the Regional Bicycle Transportation Network and local connections to the network.
460	110	Transportation	Page 61: Strategy 3 seems worthy of in-depth analysis. How are people able to access regional parks? What are the demographic characteristics of those residents? What are the best methods for increasing accessibility to the regional park system? The current plan document lacks details on how to accomplish this important task.	Thrive MSP 2040 states that the 2040 Regional Parks Policy Plan is to strengthen equitable usage of regional parks and trails, subsequently the emphasis in the Policy Plan is on park and trail use. <a href="#">Click here to see the 2014 Regional Park Use Among Select Communities of Color report.</a>

Line ID	Comment ID	Theme	Comment	Response
461	110	Transportation	Page 67: While staff acknowledges that this is a plan for a regional parks system, it is important to point out the apparent disconnect between the ability of car-free households to access the regional parks system, and the desired goal of equity as outlined in <i>Thrive</i> . Having a regional park within 30 minutes' driving time seems to be an inadequate standard, at least for populations with limited transportation options.	Transit is currently provided to some regional parks, mainly in the urban centers, and future light rail transitway extensions will improve access to regional parks and trails. The 2040 Regional Parks Policy Plan includes strategies for enhancing multimodal access to regional parks, trails, and transit, where appropriate.
462	110	Transportation	Page 78: "Exploring options for siting new park-and-rides near or adjacent to regional parks, or new regional trails near park-and-rides or fixed-route transit lines." This concept seems counter to what would be beneficial to the region in terms of transit oriented or adjacent development. As stated earlier, if it is assumed that a 30 minute drive to a regional park is a reasonable distance to cover, transit is unlikely to be a viable option for connecting people to the system. In the interest of being consistent with the overall policy direction in <i>Thrive</i> , please do not base your measurements on an automobile based society.	The 2040 Regional Parks Policy Plan takes into account that transit is an option for some portions of the region, that park and rides are an integral component of the transit system, and that many residents rely on automobiles. The strategy cited aims to provide recreational and multimodal options to elements of the transit system, including park and rides.
463	101	Transportation	Pg. 61 states, "Metro Transit and other transit providers are encouraged to work with the regional park implementing agencies to identify any transportation barriers and design programs to increase the level of access to the Regional Parks System." The Transportation Policy Plan is not supportive of local circulator transit service in transit market areas III-V, which is also where many regional park facilities are located. The Council should review its internal policies in light of goals to provide transit connections to regional parks facilities.	This statement has been revised to read: "Metro Transit and other transit providers are encouraged to work with the regional park implementing agencies to identify any transportation barriers and design programs to increase the level of access to the Regional Parks System, <i>where appropriate</i> ."



Line ID	Comment ID	Theme	Comment	Response
464	38	Transportation	If a million people want to get to Como Park, why should it be the responsibility of St. Paul to get them there? Why shouldn't Metro Transit bear the responsibility to get people there just as the do for every other destination?	Metro Transit Route 3, which travels between downtown Minneapolis and downtown St. Paul and Route 83, which travels between St. Paul and Roseville and includes a connection to the Green Line LRT, provide bus access to Como Regional Park for those visitors who choose to take transit.
465	109	Transportation	A well advertised and additional transit access to regional parks is a highly deserved and well financed feature for Minnesotans.	Comment noted.
466	131	Transportation	There is a need for public transportation to parks.	Transit is currently provided to some regional parks, mainly in the urban centers. Future light rail transitway extensions will improve access to regional parks and trails in Hennepin County. Planning Strategy 2 in the 2040 Regional Parks Policy Plan indicates that the Council will collaborate with Metro Transit or local transit providers to determine the feasibility of adding transit stops that are convenient to regional parks and trails.
467	138	Transportation	Transportation to regional parks is a real issue.	Comment noted.
468	103	Transportation	Transit options to regional parks are limited. A majority of regional park users will continue to drive in their personal vehicles. There are no strategies in the 2040 Regional Parks Policy Plan which support maintaining and enhancing our local and county highway system to provide equitable access to parks.	The 2040 Regional Parks Policy Plan strives to enhance access to regional parks and trails by walking, biking and transit, where appropriate. It is acknowledged that many regional park visitors will access a park by automobile. Maintaining and enhancing the local and county highway system is outside of the purview of the 2040 Regional Parks Policy Plan, however.
469	7	Transportation	(Page 67) The draft TPP investment policies severely limit highway improvements and expansion to serve the regional park system outside the urban core.	Comment noted and forwarded to the Council's transportation planning staff.



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