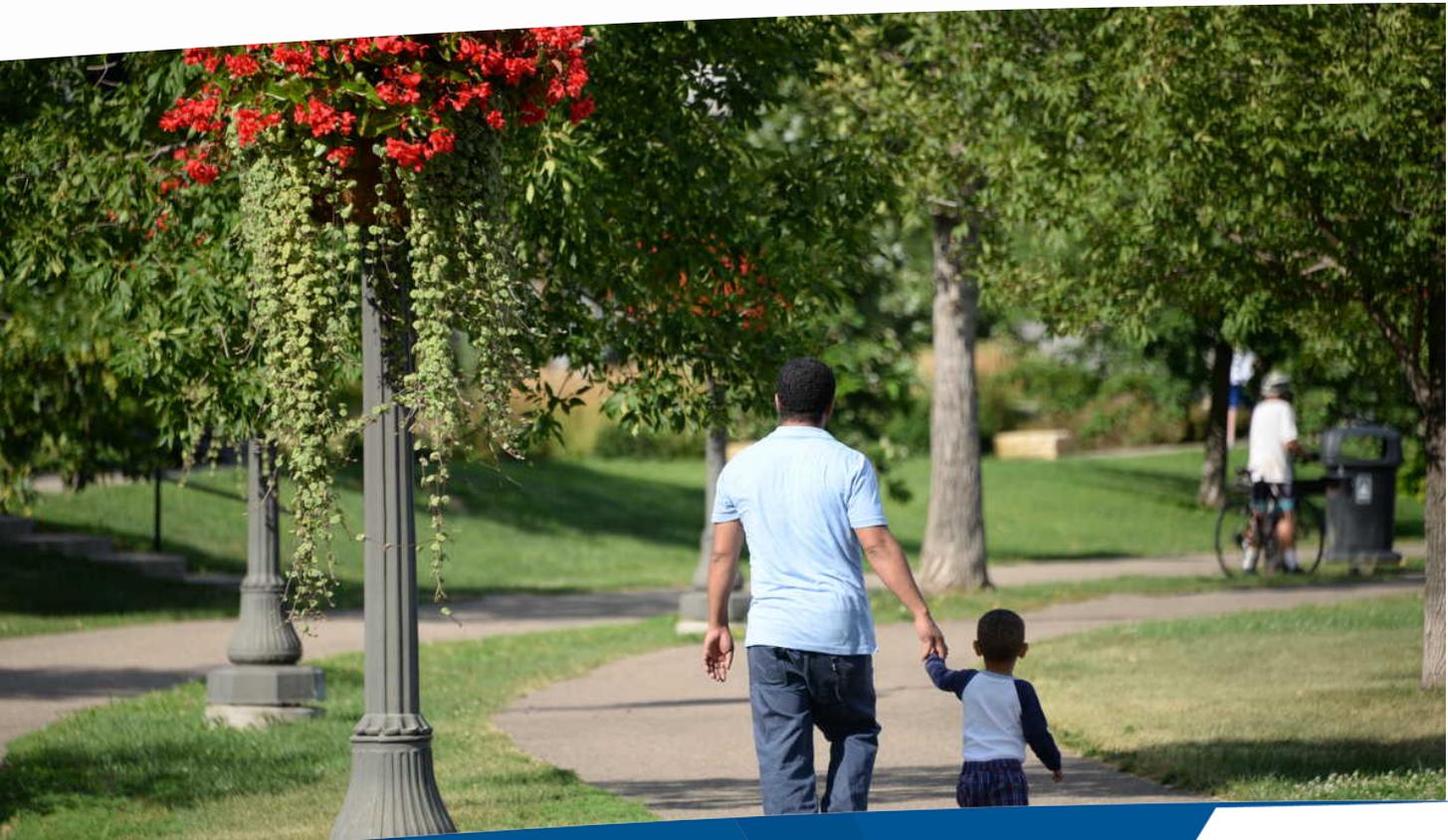


PUBLIC COMMENTS RECEIVED ON THE 2018 UPDATE TO THE 2040 REGIONAL PARKS POLICY PLAN

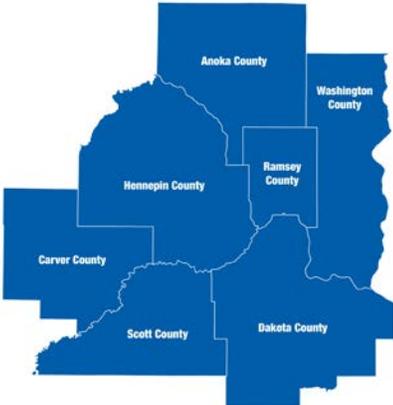


July-September 2018

The Council’s mission is to foster efficient and economic growth for a prosperous metropolitan region

Metropolitan Council Members

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Katie Rodriguez	District 1	Marie McCarthy	District 10
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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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Overview of compilation of Public Comments

This document compiles the written and in-person comments that the Metropolitan Council received on the draft 2018 update to the *2040 Regional Parks Policy Plan*.

The draft 2018 update to the *2040 Regional Parks Policy Plan* was released for public comment on July 25, 2018. The public hearing occurred on September 17, 2018, and the public comment period concluded on September 27, 2018. During that time, the plan was available on the Council's website and through printed copies as requested.

The Council received written comments from:

- Council advisory committees
- Regional park implementing agencies
- City / township / county governments
- Organizations
- Residents

15 individuals provided their oral testimony at the September 17 public hearing. An additional seven individuals left comments on the Council's voice mail.

The Public Comment Report, a compilation of the themes of these public comments, will accompany the adoption of the 2018 update to the *2040 Regional Parks Policy Plan*.

Comments at the Public Hearing

The public hearing took place at the Monday, September 17th, Community Development Committee meeting. All verbal comments made at the hearing are summarized below. A video of the meeting can be viewed through this [link](#).

Commenter	Affiliation	Comment
Atlas-Ingebretson, Lynnea	Resident	<ul style="list-style-type: none"> Equity is an issue in parks. In order to address historical inequities, we need to work to create equity. She made three main points: Don't allow equity to become a check box. It's not a metric it's a practice and way of being. Retain the language around equity toolkit project prioritization. Use and create inclusive parks research. Important research exists that can inform actions, such as if you remove fees, diversity increases. Use redline documents and surveys to collect input so that there are more options to provide comments.
Blackett, Brad	Resident, Apple Valley	<ul style="list-style-type: none"> Concerned about gradual erosion of the natural resources language in the plan. Retain existing natural resources management language. Recreation activities threaten natural resources and the regional park system. Less emphasis on funding activities and more funding on natural resources.
Cummings, Pat	Eagan, Resident	<ul style="list-style-type: none"> Retain original language in Chapter 7, Strategy 1. Remove the "balance" language. Use a third-party natural resource professional to determine the balance between natural resources and recreation In Chapter 7, Strategy 1, secondary activities should be nature specific activities (see Chapter 3)
Ewert, Mark	Chair, Scott County Parks Advisory Commission	<ul style="list-style-type: none"> Remove project prioritization language and replace it with the original draft language. There was not dialog about project prioritization being put back into the process. The development of the equity toolkit was rushed. Carrot and stick approach to project prioritization is misguided. Equity grant program has great potential. Scott County is committed to advancing equity in the County. Focus on the Equity Grant Program with genuine, collaborative partnership with the Implementing agencies.
Hedlund, Laura	Resident	<ul style="list-style-type: none"> Please do not have equity be a check box. Support for Lebanon Hills to be a park reserve. When we respect the land, the solutions will be there. Support for programs that brings people who are going through crisis into natural spaces to heal.

Jenkins, Holly	Wilderness of the City	<ul style="list-style-type: none"> • When building new facilities, they should be built to the highest LEED certification (Chapter 7). • Stronger language stating that trails within a regional park or park reserves should only serve recreation purposes not transportation (Chapter 7). • Stewardship language from Thrive should be added to the Parks Policy Plan (Chapter 1, page 1). • Requests for Legacy funds should include a report on how the ecology will be impacted and natural resources restored. • Master Plan criteria should require qualified ecology consultants be engaged throughout the process. Following the approval of the master plan a report provided on a biannual basis to ensure that natural resource component is implemented. • Follow Mississippi River Corridor Critical Area rules. • Interest earnings should be applied to natural resources management. • Support for equitable use of the regional parks system. • Establish marketing, outreach, programming, and transit for equitable use.
Lambert, Clay	On behalf of Council Member Cam Gordon, Second Ward, Minneapolis	<ul style="list-style-type: none"> • The Grand Rounds Missing Link Regional Trail Search Corridor has identified 27th Avenue as a potential location; however, this option needs master plan funding for parcel acquisition for Minneapolis Park and Recreation Board to start planning for it.
Mandell, Paul	Inver Grove Heights, Resident	<ul style="list-style-type: none"> • Too much funding for capital improvements and infrastructure Put more emphasis on natural resource management and restoration. • Legacy dollars should be used for natural resource management (reference related to Lebanon Hills). • There is an inadequate means to measure the quality of nature restoration. New language in the Policy Plan weakens this by substituting language rather adding language. More calls of public reviews of master plan implementation to avoid leaving stewardship, natural resource restoration and management to the discretion of the Implementing Agencies. • Programmed uses designed to serve the underserved – one-hour drive to Lebanon Hills versus going up north. • Seniors like passive parks and more nature-based trails. • Avoid duplication of active uses that should be in local parks. • Written comment provided.
Ortiz, Emmanuel	Parks in Power Campaign	<ul style="list-style-type: none"> • Original equity language should be enforced and advanced (project prioritization) • There should be more oversight for equity in the master plan process itself and it should be enforced. • Real shift in demographics in the region and a real shift in what people want to see in their parks.

		<ul style="list-style-type: none"> • Log jam in local parks for active programming. Regional parks can be a site for more active programming.
Ostrov, Jessica	Saint Paul, Resident	<ul style="list-style-type: none"> • Equity and inclusion language in the Policy Plan should be preserved and enhanced. • Concerned with racial profiling in the parks. • Not connecting people of color early and often results in a lack of people of diverse backgrounds working in environmental professions. • Transparency in spending related to equity.
Passe, Tom	Eagan Resident	<ul style="list-style-type: none"> • Concerned that public process was not transparent and inviting to all, only Met Council staff and implementing agencies. Not park advisory bodies or members of the public. • Redline comments were not provided to the public. • Language was deleted and replaced with language related to highway infrastructure (Page 8 Stewardship). • There was a substantial amount of language related to funding that was deleted and not provided to the public.
Riley, Allie	Resident, Saint Paul	<ul style="list-style-type: none"> • Increase Equity Toolkit accountability. • Access to regional parks is difficult for people that don't have English as their first language. • Keep equitable access in mind for limited English speakers.
Stieg, Patrick	Savage, Scott County Parks Advisory Commissioner	<ul style="list-style-type: none"> • He participated in equity toolkit development process. Surprised and disappointed that the Metropolitan Council went back to requiring project prioritization for capital improvement as if the Metropolitan Council is all knowing about the proper way Implementing Agencies face their own equity challenges. • Reprioritization is disrespectful to the Implementing Agencies. Dismayed that the Council continues a distrusting and adversarial relationship with the Implementing Agencies. Change your approach with the Implementing Agencies. Be honest, transparent, respectful, and supportive.
Tabor, Lisa	Resident	<ul style="list-style-type: none"> • Thank you for maintaining a strong position on equity. • Have integrity with the recommendations of the toolkit that was passed by the Metropolitan Council. This includes integrity around the questions itself; not all of the questions were asked or written in the form that it was approved. • Equity is not fixed by one program alone. One single grant program will not fix hundreds of years of inequities. • Have the courage to continue working on equity.
Zimmer, Catherine	Women Observing Wildlife	<ul style="list-style-type: none"> • MPOSC should discuss natural resource impacts and require master plans to address management and restoration of natural resources. • Concerned that the strike-out version of the draft Policy Plan was not provided to the public, so people could not easily see what has changed. • A commitment to protecting the natural resource base of the parks must be strengthened. • Interest earnings should be dedicated to natural resources conservation, protection, and restoration.

		<ul style="list-style-type: none">• Low impact nature-based activities must be retained, not active recreation.• Equity in the parks need to focus on having people learn things about nature.• Only select groups were engaged to update the Policy Plan.• The funding and grants section was removed and was not made available to the public for comment.
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Comments from advisory committees to the Metropolitan Council

The Council received written comments on the 2018 update to the *2040 Regional Parks Policy Plan* from:

- Metropolitan Parks and Open Space Commission, as defined in state statute
- Equity Advisory Committee

August 7, 2018

Metropolitan Parks and Open Space Commission

Metropolitan Council
390 Robert Street North
Saint Paul, MN 55101

To the Metropolitan Council:

The Metropolitan Parks and Open Space Commission has discussed the proposed update to the *2040 Regional Parks Policy Plan* at each of our eight monthly meetings so far in 2018 and will continue to discuss the plan until we recommend its adoption to you later this year.

While we look forward to reviewing comments received during the public comment period, we submit the following comments on the draft plan as released for public comment:

- **Tony Yarusso, Mahtomedi - Chair, At-Large Representative**
- **Rick Theisen, Maple Grove - District A**
- **Robert Moeller, Chaska - District B**
- **Margie Andreason, St. Louis Park - District C**
- **Catherine Fleming, Minneapolis - District D**
- **Michael Kopp, Ham Lake - District E**
- **Sarah Hietpas, Lake Elmo - District F**
- **Anthony Taylor, Saint Paul - District G**
- **Todd Kemery, Lakeville - District H**

- We support handling future potential uses of the interest earnings on Regional Parks System funds outside of the plan update and are interested in using this funding for the Equity Grant Program. (Chapter 2, Key Legislation)
- We support the strategy of geographic balance and would look forward to better articulating what geographic balance means, including how it aligns with population distribution and access to a range of recreational opportunities. (Chapter 4, Siting and Acquisition)
- We support reaffirming the equity strategies and engaging a broad community of stakeholders around equity solutions. (Chapter 7)
- We are interested in learning more about the estimated cost to complete the system, including how and why the cost increased from the 2015 plan estimate and how this significantly higher number will affect future funding strategies for the Regional Parks System. (Chapter 8)
- A majority of the Commission supports the original draft language for Finance Strategy 4: Equity Considerations, which included the following paragraph rather than the language that replaced it following amendment at your July 25, 2018 meeting:

“While the Council will not use these questions for project prioritization, the information provides the Council with a mechanism to track and monitor efforts and progress toward strengthening equitable use of the Regional Parks System.”

As Commissioners, we plan to engage our networks and partners in the public comment period on the plan. We look forward to discussing the final revisions of the update with you this fall. Thank you for your continued support of our region’s magnificent Regional Parks System.

[www.metrocouncil.org/
Council-
Meetings/Committees/
Metropolitan-Parks-and-
Open-Space-
Commission.aspx](http://www.metrocouncil.org/Council-Meetings/Committees/Metropolitan-Parks-and-Open-Space-Commission.aspx)

Sincerely,

Tony Yarusso, Chair
Metropolitan Parks and Open Space Commission

September 26, 2018

Metropolitan Council
390 Robert Street North
Saint Paul, MN 55101

SUBJECT: Equity Advisory Committee Comments on the 2040 Regional Parks Policy Plan 2018 Update

To the Metropolitan Council:

The Equity Advisory Committee (EAC) met with Community Development staff at four meetings in 2018 to learn more about the regional parks system and the draft 2018 Update to the 2040 Regional Parks Policy Plan. On September 25, 2018, Equity Advisory Committee members voted to submit the following comments for the public comment record.

Overview of the Committee's recommendations:

The EAC recommends the Metropolitan Council and regional parks system prioritize:

- Engaging people of color and indigenous peoples (POCI)
- Hiring diverse staff who reflect the diverse makeup of our region
- Identifying and mitigating barriers to POCI using parks and trails
- Making the regional parks more accessible for people with disabilities

In the *2040 Regional Parks Policy Plan 2018 Update*, the EAC further:

- Supports the creation of the equity grant program
- Supports maintaining and strengthening the language in the 2040 Regional Parks Policy plan regarding the Equity Toolkit on page 107 of the draft released for public comment: "The toolkit may be used, on occasion, to reprioritize the list of capital projects as submitted by the agencies for state and regional bonds and other funding sources as appropriate and allowable."

More detailed information about the EAC's discussion:

During the August 28th meeting, Community Development staff asked the committee to weigh in on three central questions.

1. Staff question to EAC: Beyond engagement and convenings, what else could we do around equitably planning parks in the region?

Committee response: The metropolitan regional parks system needs to create more awareness among residents to increase participation in planning and to increase the use of parks and trails among residents from diverse backgrounds. A well-intentioned, well-designed study is needed that would capture the views of respondents from as many diverse groups of people as possible to obtain their views on how to make regional parks to meets the needs of all residents. This work should include identifying the barriers to accessing the parks/trails and strategies to address overcoming barriers in plans.

The committee notes that it is difficult to make a recommendation on how to assess or measure progress on equity if there are not clear equity goals in the plan. The committee recommends adding clear equity goals to the plan. Additionally, in the plan, one of the equity strategies changed from 'strengthen equity' to 'promoting equity'. EAC members noted that this language change dilutes the

intention from something that is measurably more intensive to did you make an attempt to promote equity or not.

2. Staff question to EAC: What advice do you have as we start designing the equity grant program?

Committee response: We request that Community Development staff return to the EAC as they develop the equity grant program. The committee has several questions we want to explore further, including:

- Will community members be at the table to decide who receives the equity grants?
- Can the grant program give preference to applications located in areas of concentrated poverty, including areas of concentrated poverty where 50% or more of the population is people of color and indigenous people?

While we hope to have more opportunity to discuss the formation of this program, our initial advice is:

- It is important to develop scoring points to determine how those responsible for distributing the grants have created opportunities that would enable organizations from POCI groups to take part in the equity grants. This would create accountability in the selection process.
- Applicants should have to submit their plan to recruit and make their parks accessible. Questions would address: What would you like your usage to be? What is your plan?
- Geographic preference should be an additional consideration for the grant. For example, the difference between quality of parks in South and North Minneapolis is severe.
- Think about a matching program. If the Council funds can only be put towards capital improvements, Implementing Agencies should be required to match this funding with their own dollars. Then the matching funds can cover what the Council cannot.
- The plan does not speak to how they plan to overcome capital funding limitations.

Regarding other finance strategies in the plan, while Community Development staff did not ask the committee about the use of the equity tool kit and the option to reprioritize capital projects, EAC members support maintaining and strengthening the language in the 2040 Regional Parks Policy plan regarding the Equity Toolkit on page 107 of the draft released for public comment: “The toolkit may be used, on occasion, to reprioritize the list of capital projects as submitted by the agencies for state and regional bonds and other funding sources as appropriate and allowable.”

The committee further recommends establishing comprehensive guidelines, instructions, and support (such as trainings and mentoring) for how the Equity Toolkit is expected to be used by implementing agencies, noting that the Met Council may reprioritize projects if the toolkit is not used effectively. This would provide a measure of transparency and accountability to racial equity that is not currently present. Meaningful gains towards racial equity require institutionalized policies that do not leave decisions up to goodwill and chance. This language must be kept and strengthened, or it will be a disservice to the people of our region and the regional park system.

3. Staff question to EAC: What else could the regional system do to attract non-parks users?

Committee response: The committee would like the to see the plan address what type of programming and amenities are offered in the parks, and how these can be used to make the parks more user friendly for people of various ages, abilities, races and cultures.

As noted above, the regional parks system needs to engage in more education and awareness about the amenities available in regional parks and trails to increase visits. Committee members asked: How are

you doing the community engagement? What is your measuring tool? What is the goal for park usage by communities of color? How are you coming up with that goal?

Furthermore, across the regional system, committee members noted that parks don't offer the same amenities in the suburbs and urban areas. The committee would like to learn what the Metropolitan Council is doing to make amenities equitable across the region. We shouldn't be talking about equity and then go back to talking about regional balance. That is changing the conversation to be focused on equality and equal distribution.

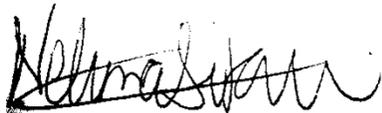
The Metropolitan Council and Implementing Agencies should understand the barriers for people accessing regional parks. For example, if fees are a barrier, can implementing agencies implement a sliding scale? Disaggregating data will be important in understanding barriers.

The committee recognizes the importance of Implementing Agencies in working towards creating a welcoming environment. An important component of creating a welcoming environment is hiring diverse parks staff. There is an identified need to hire and engage Native American communities in particular. With the park ambassador program, it is important to create equitable employment opportunities for all residents. People from diverse background would feel at ease or more at home when they feel they can relate with employees of the parks. Beyond hiring, developing recreation activities require deliberate efforts to create culturally appropriate activities to make the parks more inclusive for everyone.

Additionally, the committee recognizes that parks have a long way to go in ensuring parks are accessible for people with disabilities. As a committee, we would like more information about the degree to which parks are complying with the Americans with Disabilities Act (ADA), and how the Council measuring progress. Committee members note that while not all parks are fully accessible today, staff are working towards that goal.

On behalf of the Equity Advisory Committee, thank you for the opportunity to review and comment on the draft 2040 Regional Parks Policy Plan Update. Please contact us if you have any questions about the committee's recommendations or comments.

Sincerely,



Nelima Sitati Munene, EAC Co-Chair



Edward Reynoso, EAC Co-Chair,
Metropolitan Council Member District 9

Comments from regional park implementing agencies

The Council received nine written comments on the 2018 update to the *2040 Regional Parks Policy Plan* from eight of the ten regional park implementing agencies:

- Anoka County Parks Department
- Carver County Parks and Recreation
- Dakota County Board of Commissioners
- Minneapolis Park and Recreation Board
- Saint Paul Parks and Recreation
- Scott County Board of Commissioners
- Three Rivers Park District
- Washington County Parks

(The Council additionally received two sets of comments focused on the Grant Program Guide which was not officially released for public comment.)



Anoka County
PARKS DEPARTMENT

Parks and
Recreation Office
763-324-3300

Park
Maintenance
763-324-3326

Park Services
763-324-3360

Natural Resources
763-324-3413

Bunker Beach
Water Park
763-324-3310

Chomonix
Golf Course
763-324-3434

Wargo
Nature Center
763-324-3350

September 19, 2018

Emmett Mullin, Manager - Regional Parks & Natural Resources
Metropolitan Council
390 Robert Street N
St. Paul, MN 55101

Re: Action taken at July 25th Council Meeting, Business Item 2018-172
2040 Regional Parks Policy Plan

Dear Emmett:

While action taken by the Metropolitan Council on July 25th (Business Item 2018-172) allowed the release of the 2040 Regional Parks Policy Plan (RPPP) for public comment, embedded in that action was language to amend a portion of the Finance Section of the RPPP that is concerning to Anoka County.

Finance Section, Strategy 4: Equity considerations was revised to include language that references the equity toolkit developed in 2016 and how that information will provide the Council with “a mechanism to track and monitor progress toward strengthening equitable use of the Regional Park System.” The amended language provides the Metropolitan Parks and Open Space Commission and the Council the ability to reprioritize projects submitted to the State for state and regional bonds and other funding, excluding Parks and Trail Legacy funds. The ability to reprioritize projects is of great concern to Anoka County.

At the time of action, the Metropolitan Council may not have been aware that projects submitted to the Metropolitan Council for funding have already gone through a significant vetting process and been approved by the County Board of Commissioners through the Five-Year Capital Improvement Budget and the Parks Department Ten-year Capital Improvement Plan. A change or shift in priorities for the submitted projects will render the existing County Board action useless and require further County Board action thus delaying the overall approval process.

What is of further concern is how this language could affect some projects as it relates to bond funding. As the Council knows, bond funding is variable, sporadic and undependable. The ability for the Council to shift project priorities can potentially cause delays in projects that should not be delayed. As the RPPP states on Page 104, Lines 6-8: “Projects proposed by each regional park implementing agency are prioritized by that agency. Each park agency has unique capital needs, which that park agency can best determine.”

The County will be submitting other comments regarding the RPPP under separate cover, but wished to ensure the Council’s understanding of the County’s disagreement with the amended language of Finance Strategy 4: Equity considerations. Anoka County

recommends the amended language be struck from the Regional Parks Policy Plan update for 2018.

If you have any questions regarding this matter, please feel free to contact me at your earliest convenience at 763-324-3409 or at jeff.perry@co.anoka.mn.us.

Sincerely,



Jeff Perry, Park Director
Anoka County

cc: Jerry Soma, County Administrator
Karen Blaska, Park Planner



Anoka County
PARKS DEPARTMENT

Parks and
Recreation Office
763-324-3300

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Maintenance
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Chomonix
Golf Course
763-324-3434

Wargo
Nature Center
763-324-3350

September 19, 2018

Emmett Mullin, Manager - Regional Parks & Natural Resources
Metropolitan Council
390 Robert Street N
St. Paul, MN 55101

Re: 2018 Regional Parks Policy Plan Update

Dear Emmett:

The County of Anoka is pleased to provide you with the following comments on the 2040 Regional Parks Policy Plan – 2018 Update:

In general, it is well written and understandable, however, there are few areas that we are seeking some clarification.

1. Chapter Two, in the overview of the Regional Parks System and the 2040 Regional Parks Policy Plan, there is reference to how the RPPP advances the Thrive MSP 2040 outcomes through the expansion of the “regional parks system to conserve, maintain and connect natural resources identified as being of high quality...” The Council should consider inclusive language that allows for the acquisition of land that may not contain high quality natural resources at the time of purchase, but that has the potential to be restored to higher quality native habitat, which will not only enhance the quality of life for the region’s residents, but will also enhance the natural resources in the region.
2. In the Table 4.1 Regional Parks System: General Criteria, in Chapter Four, under both Regional Park and Park Reserve criteria, the Council should consider adding language that allows for the conservation of open and restoration of natural resources on degraded sites.
3. On Page 66, the Council should consider adding another bullet under Line 11-14 that includes language the acquisition of lands with natural resource potential to help improve water quality, provide habitat and provide a desirable environment for outdoor recreation.
4. On Page 68, Lines 25-26 seem counter-intuitive to Lines 3-5 on Page 69. Should Lines 25-26 be modified to serving a large population base?
5. On Page 69, Lines 5-6, when discussing the priority to develop trail corridors within the Metropolitan Urban Service Area, the Council should consider requiring State and Regional Transportation projects to include the construction of trails and/or bicycle and pedestrian improvements.

6. Regarding the discussion of regional trails, on Page 71, Lines 5-8 state that efforts will be made to better integrate the trail network across jurisdictions and the role of regional trail in relation to the Regional Bicycle Transportation Network, additionally it states efforts will include a comprehensive evaluation of funding for the regional trail system. The Council should consider providing an example of what those efforts will be, how they would be accomplished and provide an anticipated timeline for these efforts.
7. Page 73, Lines 20-22, discuss the Regional Parks Capital Improvement Program for acquisition and development grants. There is no definition or description for the Regional Parks Capital Improvement Program. The Council may want to consider defining what the Regional Parks Capital Improvement Program is and the funding sources used for it. As an Implementing Agency, the assumption is that it includes bonding, Parks & Trails Legacy and the POAF program. The Council should clarify this.
8. For the master plan requirements for regional trails, please specify whether or not Linking Trails located within MRCCA, should follow the MRCCA requirements shown for Destination Trails.
9. For Lines 3-4 on Page 79, relating to expanding multimodal access, clarify whether bike racks and lockers would qualify for Regional Park Capital Improvement Program funding.
10. Regarding Lines 5-6 on Page 79, if there is an existing master plan for a park and the Implementing Agency would like to add bicycle/pedestrian entrances, would the Council consider approving those changes administratively or would it need to go through the full master planning process? Our preference would be to process administratively for efficiency.
11. On Page 96, in discussing strategies to enhance equitable use, please clarify whether the proposed Park Equity grant program, referenced in Lines 20-21, will allow for non-capital projects, such as programs, shuttle services, etc. Our preference is to allow for non-capital projects.
12. Under the Finance policy section in Chapter Eight, Line 3 states the Council will provide adequate and equitable funding for the regional park system. Current funding levels are not adequate for the regional system. Bond funding is inconsistent and O&M funds are completely underfunded for what is needed to maintain the system. The Council should consider increasing both types of funding.
13. The Council should consider rephrasing Lines 32-37 on Page 103. It is unclear what this means. Does this give the Council authority to adjust project rankings submitted by the IA's? The County submits proposed projects that have been vetted properly and ranking agreed upon by the County Board of Commissioners prior to the Met Council approval process. Our preference is to allow IA's final authority for approval of revised project rankings.
14. Page 104, Lines 6-8, seems to state the opposite of the action taken at the July 25th, 2018, Metropolitan Council meeting. You may recall, the *2040 Regional Parks Policy Plan Update* was amended by the full Council to add the use of the equity toolkit, "to review, assess and, on occasion, shift the order of the prioritized list of capital projects submitted

to the state for state and regional bonds and other funding sources as appropriate and allowable, not including the Parks and Trails Legacy projects.” The Council should reverse the action on this amended language taken on July 25th, 2018. As Lines 6-8 on Page 104 states, “Projects proposed by each regional park implementing agency are prioritized by that agency. Each park agency has unique capital needs, which that park agency can best determine.”, and all projects require IA Board or Council action prior to submission to the Met Council. Any changes after that action would require a second IA Board or Council action. As a result, the County requests that the Council reverse the action regarding the Council ability to shift priorities taken on July 25th, 2018. Discussions between the IA’s and MPOSC should occur prior to any action taken the IA’s.

15. Page 107, Lines 14-21, state that the Council will create an equity grant program explicitly aimed at strengthening equitable usage of the regional system and it states the program is for capital projects. Previous discussions regarding this matter have included the need for this program to include non-capital costs, such as programming. How will non-capital costs related to strengthening equity be provided for?

If you have any questions regarding these comments, please feel free to contact me at your earliest convenience at 763-324-3409 or at jeff.perry@co.anoka.mn.us.

Sincerely,



Jeff Perry, Park Director
Anoka County

cc: Jerry Soma, County Administrator
Karen Blaska, Park Planner



**Carver
County
Parks**

11360 Highway 212 West, Suite 2
Cologne, MN 55322

September 10, 2018
Alene Tchourumoff, Chair
Metropolitan Council
390 Robert St. N
St. Paul, MN 55101

SUBJECT: CARVER COUNTY OFFICIAL COMMENT ON METROPOLITAN COUNCIL 2018 REGIONAL PARKS POLICY PLAN UPDATE

Dear Chair Tchourumoff,

Carver County, as one of ten Regional Park Implementing Agencies of the Metropolitan Regional Park System, and submits the following comments on the Draft 2018 Regional Parks Policy Plan Update for consideration by the Metropolitan Council.

Below are suggested comments for submittal to the Metropolitan Council on the Draft 2040 Regional Parks Policy Plan.

Chapter 7: Recreation Activities and Facilities Policy and Strategies

Equity Strategies

Carver County looks forward to the development of the Equity Grant Program proposed for 2019. Language should be added that such a grant program will be done in consultation with Implementing Regional Park Agencies and consistent with language stated in the Equity Grant Program section.

Chapter 8: Finance Policy and Strategies

Equity Toolkit

Carver County supports strengthening “equitable usage of regional parks and trails by our regions residents, such as across race, ethnicity, income, and ability”. However, Carver County is vehemently opposed to the ability of the Council to shift or reprioritize capital projects of an Implementing Regional Park Agency to be funded with state bonds, regional bonds and other funding sources the Council may find appropriate. Project priority is best determined at the Implementing Agency level that has the full knowledge which supports the priority of a project. The Council lacks sufficient knowledge to make such determinations and can/will adversely affect other projects, related funding sources, and public processes which support an Implementing Agency’s priorities.

Equity Grant Program

Carver County supports an equity grant program which includes funding for regional park areas which are underdeveloped, new or emerging. Without the delivery of basic services (land, restrooms, utilities, roads, parking lots,...) an agency is ill equipped to deliver a more targeted approach towards equitable usage of such park areas. The grant program should also seek geographical and proportional representation in the distribution of these funds.

Additional Finance Policy and Strategy Comments

In preparation for the 2022 Regional Parks Policy Plan revision, and to help ensure time allows for well thought out

CARVER COUNTY

finance policies, Carver County encourages the Council to initiate discussion of new finance strategies. Work could begin over the next year in partnership with Implementing Agencies of how to best fund regional parks and trails into the future.

The overall value received from bonding has declined, State bonding is uncertain, O & M funding has never reached the stated funding level of 40%, and Council bonds have gone unmatched.

The regional park system has grown in number of park and trail units and usage continues to increase. New finance strategies are needed to meet the needs of the system now and into the future.

Martin Walsh
Parks and Recreation Director

CC: Deb Barber, District 4 Council Member
Tony Yarusso, MPOSC Chair
Robert Moeller, MPOSC District B MPOSC Representative
Emmett Mullen, Parks and Natural Resources Manager



CARVER COUNTY



Office of the
County Board

September 19, 2018

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Alene Tchourumoff, Chair
Metropolitan Council
390 Robert Street North
St. Paul, MN 55101

Dear Chair Tchourumoff:

On behalf of the Dakota County Board of Commissioners, we thank you for the opportunity to comment on the Draft 2040 Regional Parks Policy Plan (RPPP). The RPPP provides the framework needed for the regional park agencies to manage and improve the Metropolitan Regional Park System and guides regional park investments that are important to citizens of Dakota County.

We would also like to thank the Metropolitan Council and staff for your careful consideration of the comments we submitted in 2014. As we reviewed this RPPP update, it became clear that several issues we raised in 2014 had been addressed in some manner. We acknowledge that assembling a policy plan for a region of this size is complicated and time intensive. We appreciate the effort the Council has made to be responsive to comments received. Enclosed are our comments for your consideration, addition and revision to the RPPP update.

We appreciate your attention to these comments and look forward to working with you towards a final version of the Regional Parks Policy Plan.

Sincerely,

A handwritten signature in black ink that reads "Kathleen A. Gaylord". The signature is fluid and cursive, with a long, sweeping tail on the letter "d".

Kathleen A. Gaylord, Chair
Dakota County Board of Commissioners

Encl. 2040 Transportation Policy Plan Dakota County Technical Comments

cc: Dakota County Board of Commissioners
Matt Smith, County Manager
Steve Mielke, Physical Development Division Director
Taud Hoopingarner, Parks, Facilities and Fleet Director
Steve Sullivan, Parks Director



Chapter 2: Overview of the Regional Parks System and the 2040 Regional Parks Policy Plan

Page 27, lines 5 - 12	<p>Interest Earnings</p> <p>County Comments: Dakota County supports the Metropolitan Council working with implementing agencies and other stakeholders establishing options for use of the interest earnings.</p>
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Chapter 3: System Plan

Chapter 3 General	<p>Regional Parks System map changes</p> <p>County Comments : Add: Mendota - Lebanon Hills Greenway, Hwy. 62 segment</p>
Pages 45- 47	<p>Regional Trails Open To The Public</p> <p>County Comments: Add: Mendota - Lebanon Hills Greenway, Hwy. 62 segment. Revise: Figure 3.4 identifying sections of regional trails not open to public including: Minnesota River Greenway, Mississippi River Regional Trail, North Creek Greenway and River to River Greenway</p>
Pages 52-53	<p>Planned Regional Trails Not Open To The Public</p> <p>County Comments: Delete: Mendota - Lebanon Hills Greenway, Hwy. 62 segment</p>

Chapter 4: Siting and Acquisition Policy and Strategies

Page 67, lines 1 - 19	<p>Geographic balance: Strategy 2: Created a stand-alone strategy that separates out the concept of geographic balance.</p> <p>County Comments: System additions based on geographic balance and population distribution has merit but is not exclusive to other considerations such as: 1) establishing destination parks and trails outside population centers that protect high quality natural resources and provide high quality nature based recreation and 2) providing access to regional parks and trails to a developing and lower population regional park system. The strategy of geographic balance of parks and trails, based on population distribution, should not reprioritize or redistribute the proportion of funding provided to implementing agencies.</p>
Page 71, line 30 – 31 page 72, line 1-4	<p>Bridging facilities: In Strategy 5, Special Recreation Features, expanded description of Bridging facilities to clarify intent of advancing equitable use of the system by focusing on groups underusing the Regional Park System.</p> <p>County Comments: Add: Establish clear definition and criteria for a Bridging facility before considering a system addition.</p>

Chapter 5: Planning Policy and Strategies

<p>Page 76, line 1 – 17</p>	<p>Mississippi River Corridor Critical Area: Expanded Strategy 1 to incorporate new Legislative requirement for regional parks, park reserves, and special recreation features in the Mississippi River Corridor Critical Area (MRCCA) and that master plans must address new standards and criteria.</p>
<p>Page 78, lines 13 - 28</p>	<p>Expanded Strategy 1 to incorporate new Legislative requirement for regional trails in the Mississippi River Corridor Critical Area (MRCCA) that trail master plans must address new standards and criteria.</p> <p>County Comments: The Mississippi River Corridor Critical Area rules may occasionally require variances from the local units of government and consideration from the Minnesota Department of Natural Resources to accommodate the public purpose of the Regional Park System so long as the purpose and spirit of the MRCCA is maintained. Examples for variances may include providing access and river based recreation opportunities, providing support facilities such as restrooms, phasing of existing improvements, protection and utilization of public investment and addressing site constraints. The Met Councils review and approval of park master plans within the MRCCA corridor should consider the shared public purposes and as-needed support facility improvements and uses that may require variances to the MRCCA rules. The Met Council should consider advocating on behalf of variance requests from implementing agencies that are in accordance with approved master plans.</p>

Chapter 7: Recreation Activities and Facilities Policy and Strategies

<p>Page 91, lines 6 - 34</p>	<p>Balance conservation and recreation: Modified Strategy 1 language to more accurately reflect that park implementing agencies must balance conservation and restoration of natural resources with the provision of recreational opportunities. Also, added criteria that activities and facilities should avoid or minimize adverse environmental effects and restore and enhance environmental quality.</p> <p>County Comments: Dakota County supports a regional park system that balances conservation and restoration of natural resources with the provision of recreational opportunities.</p>
<p>Page 92 lines 7-14</p>	<p>Secondary or support facilities/activities: The plan references that secondary or support facilities/ activities could serve specific users and communities, augmenting the desirability of a primary use within a regional park or trail. That secondary or support uses should maintain the integrity of the regional park system. That further study and the development of performance criteria for secondary or support facilities/activities is a commitment by Met Council staff in coordination with park agencies, other partners and stakeholders.</p> <p>County Comments: The County supports the establishment of clear definition and performance criteria for secondary or support facilities in coordination with park agencies, other partners and stakeholders. Also, secondary or support facilities/activities be vetted based these criteria and the integrity of the system is maintained.</p>

Pages 94 -97	<p>Equity strategies: Strategy 3 reaffirms the Council's commitment to advance equitable usage of the Regional Parks System across race, ethnicity, income and ability through multiple strategies.</p> <p>County Comments: The County supports that all residents should have the opportunity to enjoy the Regional Park System. The County supports Met Council creating an Equity Grant program (see additional comments), increased surveys and research, an Ambassador Program and providing technical assistance to implementing agencies. The County further supports establishing a public engagement process for master plan that includes all residents.</p>
Pages 97 - 101	<p>Trail system coordination: Strategy 4 enhances the commitment of the Council to better coordinate implementation of Regional Trails and the Regional Bicycle Transportation Network in partnership with stakeholders.</p> <p>County Comments: The County agrees with the policy plan language that a more integrated and collaborative approach is needed for regional trails and the Regional Bicycle Transportation Network (RBTN). The Met Council's update of the Regional Park Policy Plan and Transportation Policy Plan provides no coordinated approach between the respective regional trail system and the RBTN. As currently defined, the RBTN doesn't include many County regional greenways and trails that provide a higher public value accommodating both transportation and recreation options to the public. The regional solicitation provides grant scoring preference for RBTN corridors that disregards the transportation benefits associated with many regional trails and greenways. The County asks the Met Council to consider designating regional greenways and trails within the MUSA as Tier 1 RBTN's.</p>

Chapter 8: Finance Policy and Strategies

Chapter 8 General	<p>New Finance Chapter: The new Finance chapter consolidates the financial information from the policy plan into one chapter, and it moves financial administrative and operational guidance to the new Grant Program Guide, the policy plan's companion document.</p> <p>County Comments: The County supports the revision of the policy plan consolidating fiscal information into a single charter resulting in a clearer document to navigate.</p>
Page 102, lines 28 - 29 Page 103, lines 16 - 19	<p>Uses of bond funds: Strategy 2 clarifies that bond funds may be used for natural resource restoration work such as transforming cropland into a more representative native landscape.</p> <p>County Comments: The County supports the policy plan clarifying natural resource restoration as a capital improvement and eligible for bond funds.</p>
Pages 105 - 106	<p>2017 legislative changes: The 2017 State Legislature directed that the Parks and Trails Legacy funding be spent only on projects approved by the park implementing agencies' elected bodies.</p>

	<p>County Comments: The County fully supports the statutory change having the implementing agencies Boards determine the type and prioritization of projects using Parks and Trails Legacy funds and not requiring a minimum level of funding to “connect people and the outdoors”.</p>
<p>Page 106, line 32 - 36 page 107, line 1 -13</p>	<p>Equity toolkit: Strategy 4 strategy language and provides updated language regarding the use of the Council’s equity toolkit.</p> <p>County Comments: The County supports the language recommended by the Metropolitan Parks and Open Space Committee that the toolkit will not be used to prioritize implementing agencies projects submitted for either Parks and Trail Legacy or State and Regional bonding. The County doesn't support amended language by the Metropolitan Council, “The Metropolitan Parks and Open Space Committee and Council will use the equity tool kit to review, assess and on occasion, shift the order of the prioritized list of capital projects submitted to the State for State and regional bonds and other funding sources as appropriate and allowable, not including the Park and Trails Legacy projects. Reprioritization will in no way apply to regional park implementing agency projects that serve as a match to Federal or State funds. The review of proposed projects will in no way alter the agencies share of funding received from State or regional bonds.” The County asks Met Council to rescind the CDC amendment not providing for prioritization of bonded capital projects. The County Board currently establishes capital projects based on an array of public needs that includes equity considerations. Also, the County’s CIP process includes a technical, public and public policy review. Reprioritization by the Met Council after this due process disregards the effort and usurps the County Boards responsibility.</p>
<p>Page 107, lines 14 – 21</p>	<p>Equity Grant Program: Strategy 4 commits the Council to establishing the Equity Grant Program by no later than 2019. Using Council bonds, it will be used to strengthen equitable use of the Regional Parks System. It will be developed in close collaboration with regional park implementing agencies, community-based partners, and stakeholders.</p> <p>County Comments: The County supports the Met Councils interests to provide additional funding to advance the use of the regional system by under-represented populations. The County asks the Met Council to consider a new or alternative funding source other than regional bonds. Capital bonding needs within the regional systems have not been met historically by the legislature. This has resulted in less Met Council bonding match. Priority projects are being delayed or advanced with implementing agency funds. The use of County funds places an increased burden on local tax payers to support the regional system. Also, the funding source is limiting since many equity initiatives are not capital projects, but operational, e.g. increasing awareness via marketing, promoting public safety via increased patrol presence.</p>
<p>Page 107 - 108, lines 22- 38 and 1-11</p>	<p>Reimbursement Limitations: Strategy 6 allows for the Metropolitan Council to reimburse implementing agencies through future CIP bonding process for acquisitions and development where implementing agency fund were used.</p> <p>County Comments: The County supports the reimbursement policy. There is a need for increased Metropolitan Council advocacy for addition regional park system funding. The issue is the regional park and trail system needs and associated improvements has outpaced Metropolitan Council and State funding resulting in increased implementing agency investment. Historically the County funds approximately 50% of it CIP using local funds which has resulted in an approve Met Council reimbursement balance of \$27M. This has placed an undue pressure on local tax payers to support the regional system.</p>

<p>Page 108, line 24 - 33 page 109, line 1- 8</p>	<p>Park Acquisition Opportunity Fund Program: Strategy 7 is a new strategy that describes the Park Acquisition Opportunity Fund program and its purpose. Details about this program have been moved to the Program Guide.</p> <p>County Comments: The Council confirms the practice to use Park Acquisition Opportunity Fund to pay for acquisition of public land that was secured by the local units of governments and agencies for the purpose of a regional trail corridor. Examples of this is cities securing land with developments using it parks dedication and having implementing agencies pay the cities the cash park dedication equivalent that would have been received by the local unit of government. Not allowing local units of government to serve as a third party to secure land will diminish regional effectiveness delivering the regional trail system.</p>
<p>Page 109, lines 9 – 34</p>	<p>Operation and Maintenance Program: Strategy 8 is a new strategy that describes the Operation and Maintenance program and its purpose.</p> <p>County Comments: The Met Council should advocate for full Operation and Maintenance funding per Minnesota State Statute 473.351that... Each implementing agency must receive no less than 40% of its actual operations and maintenance expenses.</p>
<p>Page 110, lines 11 – 15</p>	<p>Other Funding: In Strategy 9, Other Funding, the Council states that it will work on behalf of the park implementing agencies to explore other funding sources, including expanding the use of the Environment and Natural Resources Trust Fund in partnership with the Legislative-Citizen Commission on Minnesota Resources.</p> <p>County Comment: The County supports the Met Councils work with implementing agencies to explore other funding sources.</p>
<p>Pages 110 lines 34-37 Pages111- 112</p>	<p>Estimated costs to complete the system: In Strategy 9, the Council includes an updated estimate of costs to complete the system calculation, as required by Minnesota Statute 473.147. The estimated build-out of the entire system is roughly \$2.6 billion.</p> <p>County Comment: The build out of the system will likely require decades and possibly a century to achieve. The County recommends that the Met Council work with the implementing agencies to evaluate the 10 year highest priority capital needs and associated costs of the regional park system. The evaluation considers a revenue approach options using traditional funding sources and also potential new revenues to fulfill the 10 year needs.</p>



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September 25, 2018

Emmett Mullin
Parks and Natural Resources Manager
Metropolitan Council
390 North Robert Street
St. Paul, MN 55101

RE: 2040 Regional Parks Policy Plan Update

Dear Mr. Mullin:

The Minneapolis Park and Recreation Board (MPRB) applauds the Metropolitan Council for carefully engaging the ten regional park implementing agencies in the preparation of the 2040 Regional Parks Policy Plan (RPPP) update. The multiple discussion sessions that you and your staff managed have led to a document with some significant improvements. Though MPRB understands the scope for this update was rather narrow, we nevertheless appreciate you making important efforts to engage key stakeholders in your work.

MPRB staff feel that this RPPP update takes several important steps forward with regard to racial equity, which is central to every aspect of our work. In particular, the plan's commitment to a firm timeline for launching the long-promised equity grant program is a critical step. **We wholeheartedly support the 2019 initiation of the grant program.**

However, we remain uncomfortable with the plan's continued direction that implementing agency project priorities may be re-ordered by the Council based on equity toolkit questions. We recognize and appreciate that staff's original draft did not include this language and that it was added by the Council itself, even over the objections of the Metropolitan Parks and Open Space Commission (MPOSC). This potential re-ordering creates an adversarial relationship between the implementing agencies and the Council while doing nothing to actually promote equity. Re-ordering could make the Met Council's directions out of line with the elected boards of the implementing agencies, and will require unnecessary additional paperwork and staff time. **MPRB staff believe strongly that this provision should be removed.** The important work of equity should be focused on master plan community engagement and the launch of the equity grant program—two areas where real results are possible.

In an effort to make our comments easier to tabulate, the remainder of this letter is organized according to the chapters of the plan. If a chapter does not appear, we have no substantive comments on that chapter.

CHAPTER 2

Page 27, Lines 5-12, Interest Earnings. Though, as you may expect, MPRB believes these interest earnings should remain dedicated to North Mississippi

Regional Park, as originally intended, we appreciate the current non-determination of the eventual use of these funds. There was not enough time for proper engagement and discussion around how these funds will be spent in the future, so leaving that decision open is the correct approach. The “Summary of Changes” document notes that “options...will be determined by the Council working in coordination with [MPOSC], park implementing agencies, and stakeholders, outside of this policy plan update.” MPRB staff agree with that direction, and would **recommend it be written into the plan itself**. As currently written, there would be no policy direction to include implementing agencies in the conversation about expenditures of these funds.

CHAPTER 3

Page 53, Planned Parks and Trails Map. It appears that Above the Falls Regional Park is shown on this map as not yet open to the public, while also being shown on page 41 as being open. **MPRB recommends removal of ATF from this map.**

CHAPTER 4

Page 66, Strategy 1. **MPRB staff appreciates and strongly supports the revised language in this strategy that recognizes the importance of lands with restoration potential.** In the developed urban core, there are no longer any “pristine” lands for natural resource preservation, while at the same time there are gaps in the regional system that are disproportionately affecting communities of color and lower-wealth communities. MPRB’s only option for increasing equitable access to regional parks will be to acquire some decidedly non-natural parcels and restore them to functioning ecosystems and park spaces. The RPPP update draft clearly recognizes this fact.

Page 70, Lines 23-32. Expanding on the discussion above, MPRB staff believe the importance of restoration areas also applies to regional trail corridors. **MPRB staff recommends including language about areas with restoration potential into the first sentence of this section.** This would recognize that new regional trails may, like parks, pass through areas currently not very “natural,” but that restoration of historic natural areas, waterways, and wildlife corridors is an important aspect of the regional system.

CHAPTER 5

Overall MPRB staff believes this chapter includes several important technical/functional improvements. We appreciate the stated provision of assistance with demographic analysis (with the hope that the data on offer will extend to useful user information for each park and trail). We believe the requirements as described under “Community engagement and participation” are important in furthering the Council’s and MPRB’s equity goals. However, MPRB staff believes that the language in this section could go farther. **We recommend including the words “equitable and community engaged” to the Planning Policy statement itself**, so that we are, up front, describing the kind of master planning expected of the regional system as a whole. By “promoting equitable, community engaged master planning” the Council will solidify its stance on this key aspect of building out the regional system.

Beginning on *Page 74, Line 38*, the list of activities required in a master planning process is good. MPRB staff would, however, appreciate an **even clearer statement that accomplishing and documenting a public engagement process as described in the plan will be a requirement for plan adoption**. Unless regional park and trail master plans are themselves equitably created with community engagement processes that “mitigate existing...barriers and include people of diverse [backgrounds],” the system will never be implemented equitably. The master planning process is a key lever for accomplishing equity goals system wide. This section should be stronger in the plan.

CHAPTER 7

Strategy 1. Though MPRB staff are in favor of the description that parks and trails must balance recreation and conservation, we are still not satisfied with the remainder of the lengthy description about allowable park uses. Extensive conversation took place among Met Council staff and implementing agency staff on this topic, and we do not feel the issue has been adequately addressed in the draft plan. One key issue is that the arbitrary list of uses remains in the document, still holding up a strange mix of park uses as ideal while failing to recognize emerging recreational trends. **Our concern is not with getting this list right, it is with having the list at all**. The text does make overtures toward opening the door to additional allowable activities, but it ultimately concludes with a confusing statement (*Page 93, Line 40 through Page 94, Line 3*) about who determines appropriateness. One could argue that any facility type—from a parking lot to a nature center—could be constructed in a way that is a detriment to the natural environment, or in a way that is beneficial. The question is not WHAT activities should be included or excluded, but HOW activities are appropriately designed into the natural character of the regional park. **MPRB staff believe that a community engaged master plan is the only way to determine appropriateness of activities and that no prescribed list should be included in the plan**. In particular, the continued absence of play areas in the list and the inclusion of motorized (snowmobiling) or potentially motorized (boating) sports in the list while the Met Council disallows counting of cars and even bicyclists on Minneapolis Grand Rounds Parkways demonstrates inconsistent application of the list.

Page 94, Lines 24-26. MPRB staff will attempt bravely to not take offense that activities like nature study and water recreation are more likely at parks in the Rural Service Area. We note that a certain number of people regularly use the Chain of Lakes for water recreation. Perhaps this simply needs a rewording.

CHAPTER 8

Page 103, Line 16-19. MPRB staff appreciates this strong statement on the importance of using bond funds for natural resource restoration, especially “transforming industrial lands into a more diverse natural landscape.”

Page 110, Strategy 9. MPRB staff applauds the Metropolitan Council for thinking forward about funding needs and recognizing the importance of additional funding options.

MPRB appreciates the opportunity to participate in the creation of the plan and to comment on the draft. We hope the Metropolitan Council will take our comments to heart, especially those related to project re-ordering, which is a real functional issue for the implementing agencies and will not accomplish equity goals as effectively as prompt initiation of the grant program and strong overview of community engagement around master plans. Overall, the draft is a positive step. Should our few concerns be addressed, we look forward to lending our support to the final draft.

Sincerely,

Adam Regn Arvidson, PLA, FASLA
Director of Strategic Planning
Minneapolis Park and Recreation Board

DEPARTMENT OF PARKS AND RECREATION

Michael Hahm, CPRP - Director



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September 25, 2018

Metropolitan Council
390 Robert Street N
Saint Paul, MN 55101

Honorable Members of the Metropolitan Council and Metropolitan Parks and Open Space Commission:

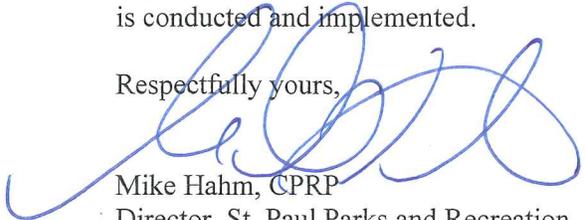
Saint Paul Parks and Recreation would like to express our thanks for the opportunity to review and comment on the draft update of the Regional Parks Policy Plan (RPPP). We also appreciate the engagement process used during the drafting of the plan that allowed the parks implementing agencies to participate in a series of focused discussions surrounding various portions of the plan. We feel that those discussions were adequately incorporated into the draft update.

There has been significant discussion among the implementing agencies about how the subject of equity should be addressed in the RPPP and in on-going efforts to make the regional parks and trails system truly accessible and enjoyable by all residents of the region. The draft updates policies around equity and helps clarify how the policies relate to one another. We support this change, and we also strongly support the implementation of the equity capital grant program to provide a funding source to accelerate equitable changes to the regional parks and trails system.

We do however have concerns about the amended language that allows project reprioritization based on equity criteria. We fully support the on-going use of the equity tool kit and efforts to emphasize the equity work that agencies are doing. However, the proposed language does more harm to the strong partnership that the ten implementing agencies have with each other and the Metropolitan Council than the positive equity outcomes it could achieve. We support removal of the reprioritization language and welcome continued dialogue about additional tools agencies can use to work toward equity in the system.

We finally wish to express our support for providing acknowledgement of Council interest earnings without prescribing how they be specifically used. We urge your continued consideration of using these funds to cover opportunity costs associated with the implementation of the 2016 Visitor Study until the proposed 2020 Study is conducted and implemented.

Respectfully yours,


Mike Hahm, CPRP
Director, St. Paul Parks and Recreation



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Ms. Alene Tchourumoff
Metropolitan Council
390 North Robert Street
St. Paul, MN 55101
(also via email @ public.info@metc.state.mn.us)

September 24, 2018

Subject: Comments on the Draft 2040 Regional Parks Policy Plan Update

Dear Chair Tchourumoff,

Thank you for the opportunity to provide comments on the draft update to the 2040 Regional Parks Policy Plan (Plan). The Plan has been an essential guiding document that has helped shape a superb park system that protects the best natural resources and offers the best outdoor recreation in the region, promoting healthy and livable communities. While we support several specific changes and additions to the plan, we also have significant concerns.

Scott County is an 'implementing agency' of the regional recreation system. The County owns and operates regional parks and trails and is acquiring land for additional regional facilities. Regional parks and trails play a vital role in the livability of our community, and as such, Scott County makes significant local investment to acquire, plan, build and operate our regional park and trail system, and we plan and prioritize efforts to ensure these investments are accessible to all.

As a provider of regional parks and trails, we have learned from our experiences, which include successes and failures. One of the most important strengths of the Metropolitan Regional Parks and Open Space system is the partnership amongst the ten implementing agencies of the region, and the Council, and the opportunity this partnership affords to learn from one another. Scott County participated in the 2040 Regional Park Policy Plan update process that kicked off last October. As an owner/operator guided by an elected Board, the County sees its role in the Plan as helping to shape policies that affect our residents. We see our experiences and feedback, along with the nine other implementing agencies, as critical to the process of creating sound policy. As such, and on behalf of the County Board, County leadership participated in all eight of the planning sessions held for the regional park implementing agencies and Council staff; and the Scott County Parks Advisory Commission (PAC) hosted a presentation on the Plan by Metropolitan Parks and Planning staff. It's within this context that I submit these comments and concerns on behalf of the Scott County Board of Commissioners.

Of particular concern is the lack of transparency by the Council regarding draft plan language that was changed after a lengthy planning process and mischaracterization by the Council of the significance of the change. This particular concern is detailed in # 1 below.

1. Equity Toolkit and Prioritization of Regional Park Agency Capital Projects (Page 106 – 107)

Scott County is opposed to Council reprioritization of implementing agency capital projects. Scott County supports advancement of equity in the regional park system but firmly believes that reprioritization of projects by the Council in the pursuit of equity is ineffective. The Council's focus on reprioritization and other heavy-handed strategies such as the minimum percent policy that has been removed from the plan have been a distraction to moving forward strategies to advance equity, such as development of the Equity Grant Program. These are examples of unsound policies pushed forward by the Council. The elected bodies of the regional park agencies have the experience and local knowledge to effectively make capital project prioritization determinations with equity in mind.

Scott County requests the draft 2040 Plan language prepared after nine months of stakeholder meetings and input sessions and approved on July 12, 2018 by the Metropolitan Parks and Open Space Commission be re-instated into the plan. We request the following changes (Page 107, lines 5 – 19).

*The purpose of this equity toolkit is to raise questions of equity in conversation with the regional park implementing agencies and their Boards as they select and prioritize projects. These discussions are held with the Metropolitan Parks and Open Space Commission, during the review of the agencies' Parks and Trails Legacy project proposals and Bonding project proposals. The toolkit includes a short series of question that regional park implementing agencies complete as a core part of their Parks and Trails Legacy project proposals, and Bonding project proposals. The toolkit helps identify populations that the project seeks to better serve. **Add the following line that was approved by MPOSC on July 12:** While the Council will not use these questions for project prioritization, the information provides the Council with a mechanism to track and monitor efforts and progress toward strengthening equitable use of the Regional Park System.*

*The information provides the Council with a mechanism to track and monitor efforts and progress toward strengthening equitable use of the Regional Park System. **Omit the following line which was added after the draft plan language was prepared and approved by MPOSC on July 12:** ~~The Metropolitan Parks and Open Space Commission and the Council will use the equity toolkit to review, assess and, on occasion, shift the order of the prioritized list of capital projects submitted to the state for the Parks and Trails Legacy projects. Reprioritization will in no way apply to regional park implementing agency projects that serve as a match to Federal or State Funds. The review of proposed projects will in no way alter an agency's share of funding received from state and regional bonds.~~*

Scott County is concerned with the lack of transparency used by the Council regarding discussions of and changes to the prioritization language above. Implementing agency concern about reprioritization was well known by the Council from the nine-month long planning process that led up to the release of the draft document. At five of eight meetings between Council and the regional park agencies, opposition by all ten agencies was discussed at length and made

clear. At the May, 2018 meeting of the Scott County Parks Advisory Commission (PAC), Council staff and MPOSC members listened to feedback and assured the PAC that prioritization was being taken out of the plan. After all of this discussion and specific feedback from the local agencies representing their elected bodies, the lack of notification to the agencies that a substantive change was being considered is deeply concerning. Furthermore, characterization of the significance of the change at the July 25, 2018 Council meeting as not a big change – Councilmember quote - “I would suggest that it’s really not that big of a change from what has existed” is also deeply concerning.

And finally, the characterization by the Council at its July 25, 2018 meeting that the Council engaged in transparent and substantial dialog when it first introduced the policy of prioritizing agency projects in the 2014 planning process is not a fair or accurate statement. In fact, during that 2014 planning process Council staff informed the regional park agencies that the planning process was on an accelerated timeline and there wasn’t sufficient time to dialog with Scott County and the other regional park implementing agencies on the new policies and strategies being introduced, such as project prioritization, the Equity Toolkit and Equity Grant program. We were asked to trust that the Council would engage with us at a later date to develop the particulars of these policies and strategies. After the approval of the 2014 plan, as Council developed the details of these policies, Scott County and the other regional park agencies were not engaged as partners who own and operate the regional system.

2. Equity Grant Program

The Equity Grant Program concept was approved four years ago in the development of the 2014 Regional Parks Policy Plan. In comments submitted by Scott County to the Council at that time, we urged that development of the program be prioritized. The program is not yet developed; the County again urges the Council to move this program ahead. We also request the Council engage with Scott County and the other implementing agencies in a genuine collaboration to develop the program.

It is the County’s position that the Equity Grant Program shall remain solely available to the regional park implementing agencies. The regional park agencies and their elected bodies are in the best position to propose and implement grant projects that will move the needle towards a more accessible and welcoming regional park system.

3. Regional Park System Funding and Local Contributions (Pages 22 – 23)

There is an important gap in information in this section. This section outlines the multiple state and regional funding sources that help acquire, build and operate the system, however it omits data or reference to the financial commitment the ten regional park implementing agencies have made and continue to make in developing and operating the system. While the state and the regional contributions play a significant role in getting parks and facilities to an operating stage the agencies often make substantial contributions towards acquisition and development, and the implementing agencies then assume nearly 90% of the costs to operate the system forever.

As a policy document intended to inform and guide policy makers in decision making, it’s problematic to ignore local investments of funding into the system. Scott County requests language be added acknowledging the funding contributions of the implementing agencies that own and operate the system.

4. Other Funding (Page 10)

Scott County supports the idea of exploring other funding sources, including the expansion of the use of the Environment and Natural Resources Trust Fund in partnership with the Legislative-Citizen Commission on Minnesota Resources.

Scott County requests that language be added that the implementing agencies will be included in these discussions.

5. 2016 Collaboration and the Equity Toolkit (Page 107)

With all due respect, the County takes exception with the line that reads "The Council developed an equity toolkit in 2016, in collaboration with external partners and stakeholders, including the regional park agencies." County staff leadership and members of the Scott County Parks Advisory Commission participated in this process and did not find it a collaborative process in any way. We do not believe this is an accurate account.

6. Collaboration (Page 8)

Scott County is concerned with the Councils' lack of commitment to genuine collaboration as evidenced by the process used to develop the Equity Toolkit in 2016, the process to define the 'minimum percent' policy in 2016, lack of progress in developing the Equity Grant Program since 2014, and the lack of transparency related to last minute draft plan language known to be of significant importance to Scott County and most if not all of the implementing agencies.

7. Interest Earnings

Scott County's position is that these funds are for use within the regional parks and trails system and that they be made available solely to the regional park implementing agencies. The County recommends these funds be considered for use in the competitive Equity Grant Program. Currently the Equity Grant Program is planned to be funded by bonding dollars and thus would be limited to capital projects. Adding interest earnings as a source of funding would provide the opportunity for non-capital projects. We believe a mix of non-capital and capital funds would support a better mix of projects and creative strategies.

Thank you for the opportunity to provide comments. We look forward to your response.

Sincerely,



Thomas J. Wolf, Chair
Scott County Board of Commissioners.

September 27, 2018

**Three Rivers
Park District
Board of
Commissioners**

Ms. Alene Tchourumoff
Metropolitan Council
390 Robert St. N.
St. Paul, MN 55101
(Also via email @ public.info@metc.state.mn.us)

Penny Steele
District 1

RE: Comments on the Draft 2040 Regional Parks Policy Plan Update

Dear Chair Tchourumoff:

Jennifer DeJournett
District 2

Thank you for the opportunity to comment of the Draft 2040 Regional Parks Policy Plan (Plan).

Daniel Freeman
Vice Chair
District 3

Three Rivers thanks Council staff for their efforts to work with the ten Regional Parks Implementing Agencies as true partners in the development of the draft Plan. Council staff were respectful, thoughtful, and transparent throughout the process of updating the Plan. Consequently, the proposed update of the Plan approved by the Metropolitan Parks and Open Space Commission (MPOSC) reflects this partnership approach and no changes were needed.

John Gunyou
Chair
District 4

However, the Community Development Committee (CDC) made a significant modification of the draft Plan immediately prior to approval for release of the Plan for public comment. This modification does not reflect the partnership approach to development of the update and does not reflect the language approved by MPOSC. The added language raises significant concerns about the value the Council places on its partnership with the ten Park Implementing Agencies. The original language approved by MPOSC should be restored in the final Plan.

John Gibbs
District 5

Steven Antolak
Appointed
At Large

Three Rivers Park District requests the draft 2040 Plan language prepared after nine months of stakeholder meetings and input sessions and approved on July 12, 2018 by the Metropolitan Parks and Open Space Commission be re-instated into the plan. We request the following changes (Page 107, lines 5 – 19).

Gene Kay
Appointed
At Large

*The purpose of this equity toolkit is to raise questions of equity in conversation with the regional park implementing agencies and their Boards as they select and prioritize projects. These discussions are held with the Metropolitan Parks and Open Space Commission, during the review of the agencies' Parks and Trails Legacy project proposals and Bonding project proposals. The toolkit includes a short series of question that regional park implementing agencies complete as a core part of their Parks and Trails Legacy project proposals, and Bonding project proposals. The toolkit helps identify populations that the project seeks to better serve. **Add the***

Boe Carlson
Superintendent

following line that was approved by MPOSC on July 12: While the Council will not use these questions for project prioritization, the information provides the Council with a mechanism to track and monitor efforts and progress toward strengthening equitable use of the Regional Park System.

*The information provides the Council with a mechanism to track and monitor efforts and progress toward strengthening equitable use of the Regional Park System. **Omit the following line which was added by the CDC immediately prior to release of the Plan for public comment:** ~~The Metropolitan Parks and Open Space Commission and the Council will use the equity toolkit to review, assess and, on occasion, shift the order of the prioritized list of capital projects submitted to the state for the Parks and Trails Legacy projects. Reprioritization will in no way apply to regional park implementing agency projects that serve as a match to Federal or State Funds. The review of proposed projects will in no way alter an agency's share of funding received from state and regional bonds.~~*

There are several reasons why the prioritization language should be removed:

A. The prioritization language does not recognize or respect the authority of the elected Boards that govern the Regional Parks System.

Each of the ten Park Implementing Agencies is governed by a Board composed of a majority of elected officials. Elected bodies should retain their authority to prioritize projects. The Regional Parks System is a ***Partnership*** between the ten Regional Park Agencies and the Metropolitan Council. Prioritization goes against the recommendations of the Partnership.

B. The Park Implementing Agencies have the greatest degree of expertise when making prioritization decisions.

The ten Park Implementing Agencies own and operate the entire Regional Parks System. They have staff involved in community outreach, in programming, in education, in planning, in research, in design, and in finance. All of these areas of expertise come into play when making decisions regarding equity and its relationship to prioritizing capital projects for possible state funding.

C. Capital projects submitted to the Council have already been prioritized with equity considerations, but also include several other factors that must be considered.

Council reprioritization is not equipped to take these other considerations into account. They include:

- Project phasing;
- Reduction of impacts on park visitors by timing the project with other projects at the park;
- Availability of other funding;
- Additional costs incurred if major maintenance projects are forced to be deferred;
- Cash flow considerations; and/or
- Work load considerations.

D. State Bonding levels are at the discretion of the State Legislature.

The Council routinely asks the Park Implementing Agencies to submit a list of prioritized capital projects at a State Bonding level that is unrealistic (e.g. a \$15 million target for the 2018 State Bond). The reality is that the Legislature rarely bonds at the target level. An agency's prioritized list at a \$15 million target will likely be very different than the same agency's list at a \$5 million target. Council prioritization occurs only at the inflated target

projection in the initial stages of list submittal, and such prioritization can inadvertently result in shorting all of the projects, including the direct equity projects, making none of the projects achievable.

E. The Council's record on prior attempts to prioritize capital projects has shown that the Equity Toolkit was not designed for this purpose.

The Equity Toolkit was designed to educate, inform and engage the Park Implementing Agencies with local constituents in their planning efforts, programming efforts and capital design efforts. To that end, the Toolkit has been successful. The 2016 Regional Parks Study done by the Council indicates that ethnic and racial minorities are no longer underserved by the regional parks system.

The Equity Toolkit was not designed as a metric for prioritization. The Toolkit and the Policy Plan do not provide any guidance on how prioritization would work. The lack of a defined prioritization process was an issue the last two times the Council attempted to prioritize Park Implementing Agency projects. MPOSC was forced to make decisions on an anecdotal basis. MPOSC members expressed significant frustration with the process. Park Agencies also expressed significant frustration. No significant prioritization decisions were made and the Partnership was damaged.

Three Rivers and the other Park Implementing Agencies are committed to equitable service to all residents of the region. Project prioritization taken out of context does more harm than good. The original language as approved by MPOSC should be reinstated in the final Plan.

Thank you for your consideration.

Respectfully,

A handwritten signature in black ink, appearing to read 'Jonathan Vlaming', written in a cursive style.

Jonathan Vlaming
Associate Superintendent



Donald J. Theisen, P.E.
Director

Wayne H. Sandberg, P.E.
Deputy Director/County Engineer

September 26, 2018

Emmett Mullin
390 North Robert Street
Saint Paul, MN 55101

RE: Review of Regional Parks Policy Plan & Grant Program Guide – 2018 Draft Update

Dear Mr. Mullin,

Washington County appreciates the opportunity to review the draft Regional Parks Policy Plan and Grant Program Guide update. The county recognizes and commends the Metropolitan Council staff and leadership on the engagement and analysis performed to-date.

Washington County Public Works staff have reviewed the draft and compiled the attached comments. The comments provided are intended to identify opportunities to improve the plan, and provide clarification or further context. The county hopes these comments will also be shared with Metropolitan Parks and Open Space Commission, the Community Development Committee, and the Metropolitan Council.

Again, we appreciate the opportunity to review the draft Regional Parks Policy Plan and Grant Program Guide update and look forward to working with the Metropolitan Council to create a common vision for the future region's parks and trail system.

Sincerely,

A handwritten signature in black ink that reads "Sandy Breuer". The signature is fluid and cursive, with a large initial "S" and "B".

Sandy Breuer
Parks Director

Washington County Comments

Draft Regional Parks Policy Plan

Figure 2-1 – Map

- The Central Greenway shown in this figure is not fully accurate. Washington County has built the following segments of the Central Greenway Regional Trail that are open to the public.
 - Along County Road 19 from I-94 to Bailey Road
 - Along County Road 19 from 70th Street to 80th Street

The remaining segments that are needed to connect I-94 to the new Cottage Grove Ravine Regional Park entrance along County Road 19 are planned, but not built.

Page 22 - Regional Park Bonding Program

- Suggest adding language to this section stating that the Metropolitan Council will work with regional implementation agencies to develop the proposed equity grant program details and scope.

Figure 3-4 – Map

- The Lake Links Regional Trail shown in this figure is not fully accurate. The section of the alignment on TH-96 is planned, but not built, and should therefore be shown as a dashed line.
- The Central Greenway shown in this figure is not fully accurate. Washington County has built the following segments of the Central Greenway Regional Trail that are open to the public.
 - Along County Road 19 from I-94 to Bailey Road
 - Along County Road 19 from 70th Street to 80th Street

The remaining segments that are needed to connect I-94 to the new Cottage Grove Ravine Regional Park entrance along County Road 19 are planned, but not built..

Figure 3-10 – Map

- The Lake Links Regional Trail shown in this figure is not fully accurate. The section of the alignment on TH-96 is planned, but not built, and should therefore be shown as a dashed line.
- The Central Greenway shown in this figure is not fully accurate. Washington County has built the following segments of the Central Greenway Regional Trail that are open to the public.
 - Along County Road 19 from I-94 to Bailey Road
 - Along County Road 19 from 70th Street to 80th Street

The remaining segments that are needed to connect I-94 to the new Cottage Grove Ravine Regional Park entrance along County Road 19 are planned, but not built.

Page 96 – Line 20-21

- Suggest adding language to this bullet stating the implementation of the Parks Equity grant program will seek geographic balance across the regional park implementation agencies.

Page 99 – Line 6-10

- Washington County appreciates and supports the Metropolitan Council’s commitment to delivering a more integrated approach to regional trails and bicycle transportation planning. We look forward to working with the regional implementation agencies and Council staff to identify opportunities for increased collaboration involving transportation and parks agency bicycle professionals and stakeholders in future planning and implementation activities of the Regional Bicycle Transportation Network and regional trail system.

Page 107 – Line 13-16

- At the July 25th Metropolitan Council meeting, the 2040 Regional Parks Policy Plan Update was amended by the full Council to add the use of the equity toolkit, “to review, assess and, on occasion, shift the order of the prioritized list of capital projects submitted to the state for state and regional bonds and other funding sources as appropriate and allowable, not including the Parks and Trails Legacy projects.” Washington County prepared the following comments on this addition:
 - Washington County, with the other agencies, believe the intention of the amendment is based in good faith. As we understand it, the amendment aims to provide Metropolitan Council continued control to prioritize capital projects in our parks, with an eye towards equity. Based on our experience, as implemented, the policy was ineffective and time consuming for implementation agency and Metropolitan Council staff. Capital projects are planned 5 years in advance and the potential for reprioritization, during the final stages of receiving funds, leaves agencies in a vulnerable position. This is why we do not support the amendment.
 - We believe there are more effective ways of implementing and measuring equity efforts within regional parks. For example, park agencies are making great strides through our planning, programming, and marketing efforts. Also, we look forward to the implementation of the Park Equity Grant program – as described in the 2040 Regional Parks Policy Plan, as a future funding source that will deal more directly with equity based park efforts.

Washington County Comments

Draft Regional Parks Grant Program Guide

Page 24 – Regional Parks Bonding Program

- Suggest adding language clarifying the Metropolitan Council’s commitment to match regional park State bonding funds that comes from sources that are not State general obligation bonds (i.e. in the 2018 legislative session, the State legislature allocated Environment and Natural Resources Trust Fund funds, not general obligation bonds).

Comments from city and township governments

The Council received one written comment on the 2018 update to the *2040 Regional Parks Policy Plan* from one local elected official:

- Cam Gordon, Minneapolis City Council Member, Second Ward

From: Gordon, Cam A. <Cam.Gordon@minneapolismn.gov>
Sent: Thursday, September 27, 2018 3:01 PM
To: PublicInfo
Subject: Regional Parks Plan Comment

Dear Metropolitan Council,

Thank you for sharing, and seeking feedback on, the draft 2040 Regional Parks Policy Plan update. The regional park system is an treasured resource. It improves the quality of life for the region, the City of Minneapolis and the people of the Second Ward, who I represent on the Minneapolis City Council.

Of particular interest to me is the Grand Round Missing link that would help connect Ward 2 neighborhoods to the river and the entire system of the Grand Rounds. I noted in the update that the only Minneapolis Regional Trail proposed without an approved master plan is the 3.5-mile-long Grand Rounds Missing Link. I am hopeful that a master plan will be submitted to you and I encourage you to approve one for this project as soon as possible. Approving a plan for this long-sought, long-awaited completion of the Grand Rounds in Minneapolis will improve access to a full range of park and other amenities, including connecting residents of South and Northeast Minneapolis to the River and enhancing the quality of life throughout the region.

I am ready and willing to assist in whatever way I can to make this Regional Trail a reality. Please do not hesitate to reach out to me and my office if I may be of any assistance now or in the future.

Sincerely,

Cam Gordon
Minneapolis City Council Member, Second Ward
673-2202, 296-0579
cam.gordon@minneapolismn.gov
<http://www.minneapolismn.gov/ward2>
<http://secondward.blogspot.com/>
<https://www.facebook.com/camgordonward2>
<https://twitter.com/CameronAGordon>

Comments from organizations

The Council received written comments on the 2018 update to the *2040 Regional Parks Policy Plan* from ten organizations, including two citizen regional parks implementing agency advisory commissions. Some of these written documents supplement testimony provided at the September 17, 2018 public hearing.

- Bush Lake Chapter - Izaak Walton League of America
- City of Skate
- Neighborhoods First
- Ramsey County Parks and Recreation Commission
- Saint Paul Bike Coalition
- Scott County Parks Advisory Commission
- Trust for Public Land
- West Side Community Organization
- Wilderness in the City
- Women Observing Wildlife



Bush Lake Chapter - Izaak Walton League of America

7515 Izaak Walton Road, Bloomington, MN 55438

www.bushlakeikes.org

*Mission: To conserve, maintain, protect, and restore the soil, forest, water, and other natural resources of the United States and other lands;
To promote the means and opportunities for the education of the public with respect to such resources and their enjoyment and wholesome utilization.*

September 21, 2018

Ms. Alene Tchourumoff, Chair
Metropolitan Council
390 Robert St N
St Paul, MN 55101
Via email: alene.tchourumoff@metc.state.mn.us

Re: The Regional Parks Policy Plan

Dear Chair Tchourumoff and members of the Metropolitan Council,

As you know the Twin Cities metro area's regional parks are some of last tracts of large open space representing ecosystems of Prairie, Savanna, Wetlands and Woodlands. The parks provide habitat for a great variety of wildlife and represent "Gateways to Nature" for the public.

The Bush Lake Chapter of the Izaak Walton League of America is a local, nonprofit conservation organization in Bloomington, MN. We are "the Defenders of Soil, Air, Woods, Water, and Wildlife." We work on local and national levels for the preservation and conservation of our cherished natural resources. Our 200+ members are a diverse group of conservation-minded outdoor enthusiasts. While our chapter is close to the Hyland-Bush-Anderson Lakes Park Reserve, which our members regularly frequent, our members also enjoy the nature and open space found in our regional parks throughout the Metro. We know that these areas provide both critical habitat for flora and fauna, as well as great opportunities for the public to experience and learn about our natural world. The City of Bloomington is one of the regional park implementing agencies, and we frequently work with the City on natural resource initiatives. We advocate for beneficial conservation projects and wise policy that improve water quality and wildlife habitat. The Izaak Walton League played a big role in the passage of the Legacy Amendment in 2008, which we continue to support and monitor where these critical funds are going.

As such, we offer the following comments on the updates to the Regional Parks Policy plan (RPPP):

1. We fully support that park implementing agencies must balance conservation and restoration of natural resources with the provision of recreational opportunities. We have noted that all too often in recent years our parks/implementing agencies are good at "building stuff" but not so good at restoring and conserving the existing natural resources.
2. We advise **strengthening accountability of natural resource management**, e.g.
 - a. For projects using Legacy funding, a natural resource restoration goal is stated and strived for.
 - b. Following approval of master plans, natural resource conservation, protection and restoration implementation reports are provided at least every three years. (*Chapter 5*)
 - c. Projects submitted for funding should include
 - i. a review by an ecology consultant to meet criteria of minimal impacts and,

- ii. a summary of how the project will benefit the integrity of the parks system.
(Chapter 5)
 - d. Restoration projects should be reviewed by qualified observers during and after the project to ensure long-term viability and success.
- 3. We advise **strengthening the integrity of nature based recreation and education opportunities**:
 - a. Secondary or support activities are currently undefined. Adding amenities to a natural setting does not make an activity “nature-based”. As such, this language needs to be removed from, or must be clearly defined in, the Policy Plan prior to its adoption to prevent potential duplication of amenities such as those in city parks and to minimize conflicts with natural resource opportunities. (Chapter 7, page 92)
- 4. We support **Leaving A Legacy of Nature** by:
 - a. Legacy funds should be used as the Legacy Amendment intended: protect drinking water sources; to protect, enhance, and restore wetlands, prairies, forests, and fish, game, and wildlife habitat; to preserve arts and cultural heritage; to support parks and trails; and to protect, enhance, and restore lakes, rivers, streams, and groundwater. New pole sheds and parking lots go against this intent and should be limited.
 - b. The use of bonding dollars for natural resource restoration (Ch. 8, p. 103, lines 16-19)
 - c. Limiting the use of Legacy Parks and Trails funds for new construction projects and, funding for new, renovation or expansion projects must meet highest level of sustainable practice as defined by LEED certification or other comparable system. (Ch. 8, Strategy 3). The Council should consider a ratio of at least 60% of Legacy Parks and Trails funds go towards natural resource, preservation, and restoration activities, and 40% or less of these funds for other projects.
 - d. Assure goals of Parks and Trails Legacy Plan are met for taking care of what we have, including natural resource stewardship, ongoing maintenance of restored lands, and engaging the next generation of stewards.
 - e. Increase equitable use of the Regional Parks System by investing in outreach and building awareness of the role Nature-based Regional Parks have in the overall system.
 - f. We fully support the statement on page 14 of the draft update, lines 22-26: “The 2040 Regional parks Policy Plan...strives to: "Expand the Regional Parks System to conserve, maintain, and connect natural resources identified as being of high quality or having regional importance, improving climate resilience, and enhancing the quality of life for the region's residents."

Our Chapter supports this and notes that an acre of prairie or woodland is much better at sequestering carbon than a parking lot or a new building.
- 5. The updated plan removes a great deal of the original RPPP language that supports and protects the natural resources which are the very basis for these parks. For example:
 - i. ~~“In addition to providing passive recreation opportunities, the park reserves also preserve, maintain and connect high quality or regionally important natural resources”, p14.~~
 - ii. ~~“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, p19.~~
 - iii. ~~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, p162.~~

Language that supports and protects natural resources should not be removed from the plan.

Thank you for the opportunity to comment and your continued efforts to protect our last open spaces.

Sincerely,

Esau Underhill
President
Bush Lake Chapter Izaak Walton League of America

cc: Steve Elkins, District 5 Met Council Commissioner steve.elkins@metc.state.mn.us
RPPP comment box: public.info@metc.state.mn.us
Representative Paul Rosenthal rep.paul.rosenthal@house.mn
Senator Melisa Franzen sen.melisa.franzen@senate.mn

From: City of Skate <cityofskate@gmail.com>
Sent: Wednesday, September 26, 2018 10:48 PM
To: PublicInfo
Subject: Comment on 2040 Regional Parks Policy Plan Draft

City of Skate as a long term partner with MPRB and as a nonprofit advocating for quality skateparks throughout Minnesota would ask that his 2040 Plan will include language to support and FUND skateparks within regional parks. Skateparks should be designed to complement the landscape and with the possibility to use as water management. Two Minneapolis regional parks(Nokomis & Bde Maka Ska) already have community approved skateparks in their master plans that will serve youth from throughout Minneapolis and the metropolitan area. A 2013 MPRB survey, with 1400 respondents, found the #1 location for a desired skatepark was within the Bda Maka Ska regional park. Skateboarding as an Olympic sport is an equity activity that serves a youth demographic that needs to be encouraged to use and discover our regional parks.

Paul Forsline
cityofskate.org
612.240.4400



September 25, 2018

Ms. Alene Tchourumoff, Chair
Metropolitan Council
390 Robert St N
St Paul, MN 55101
Via email: alene.tchourumoff@metc.state.mn.us

Re: The Regional Parks Policy plan

Dear Chair Tchourumoff and members of the Metropolitan Council,

Neighborhoods First! is a grassroots, 501c3 non-profit organization. Our mission, not unlike the Thrive 2040 goals of stewardship and livability, supports sustainable improvements to the quality of life in our community including reduced automobile use, walkable and bike-able neighborhoods, better transit, maintenance of air and water quality and more green space with native plants.

The current 2040 Regional Parks Policy plan states on page 14: “The benefits of parks have been extensively documented. Parks and open green space positively contribute to human health and well-being.” And, “Parks and open green space also contribute many environmental benefits including biodiversity conservation, air and water purification, erosion control, climate regulation, carbon dioxide sequestration, among other ecosystem services.”

The World Wildlife Fund for Nature elaborates further on the importance of biodiversity (green space, native plants, habitat and wildlife), “Biodiversity, ecosystems and the essential services that they deliver are central pillars for all life on the planet, including human life.”¹

The Twin Cities metro area’s regional parks are some of last tracts of large open space representing ecosystems of Prairie, Savanna, Wetlands and Woodlands. The parks provide habitat for a great variety of Wildlife including endangered and threatened species, are important for climate resilience and represent “Gateways to Nature” recreation for humans.

Neighborhoods First! requests with the update to the Regional Parks Policy plan that:

1. The original RPPP language that supports and protects the natural resources be retained. Examples of deletions are below:
 - i. ~~“In addition to providing passive recreation opportunities, the park reserves also preserve, maintain and connect high quality or regionally important natural resources”, p14.~~
 - ii. ~~“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, p19.~~
 - iii. ~~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, p162.~~

¹ World Wildlife Fund, The Living Planet report, http://wwf.panda.org/knowledge_hub/all_publications/lpr_2016/, viewed 6/4/18.

2. The accountability of natural resource management be strengthened, e.g.
 - a. A natural resource restoration goal, such as return of a faunal element, like the Bobolink or Scarlet Tanager is stated and strived for.
 - b. Following approval of master plans, natural resource conservation, protection and restoration implementation reports are provided at least every three years. *(Chapter 5)*
 - c. Projects submitted for funding must include
 - i. an review by ecology consultant to meet criteria of minimal impacts and,
 - ii. a summary of how the project will benefit the integrity of the parks system. *(Chapter 5)*
 - d. For regional parks, revise criteria to “Accommodates a variety of **low-impact** outdoor recreation activities” *(Chapter 4, Table 4.1)*
 - i. Permitted low impact activities align with the Regional Park Criteria list: minimal impact boating, e.g. kayaking, canoeing, biking to the park but not through the park on commuter trails, cross-country skiing, Nature appreciation, tent camping, picnicking, and snowshoeing.
 - ii. Secondary or support activities are currently undefined. Adding amenities such as a skate park or mountain bike tracks to a natural setting does not make an activity “Nature-based”. As such, this language needs to be removed from, or must be clearly defined in, the RPPP prior to its adoption to prevent duplication of amenities such as those in city parks and to minimize conflicts with natural resource based recreation. *(Chapter 7, page 92)*
3. Nature-based recreation and education opportunities be the recreational focus of the regional parks:
 - a. Regional trails serving a transportation function should be provided around the outside of regional park/park reserve boundaries; trails within park boundaries should only provide a recreation function *(Chapter 7, Strategy 4.*
 - b. Programming directed at families to increase awareness and educate visitors of all stripes about the beauty and mystique of Nature and, its importance to human mental and physical health. Many conservation and environmental organizations, e.g. The Audubon Society and Sierra Club are reaching out to underserved groups; the regional park implementing agencies could collaborate with these organizations.
4. We support **Leaving A Legacy of Nature** with:
 - a. Metropolitan Parks Interest Earnings (Laws of Minnesota 2015, First Special Session, Chapter 4, Article 4, Section 138 being spent on natural resource conservation, protection and restoration. *(Chapter.5, p12)*
 - b. The use of bonding dollars for natural resource restoration. *(Chapter 8, p. 103, lines 16-19)*
 - c. Opposing use of Legacy Parks and Trails funds for any new construction projects and, funding for renovation or expansion projects must meet highest level of sustainable practice as defined by LEED certification or other comparable system. *(Chapter. 8, Strategy 3)*
 - d. Assure goals of Parks and Trails Legacy Plan are met for taking care of what we have, including natural resource stewardship, and engaging the next generation of stewards.
 - e. Increase equitable use of the Regional Parks System by investing in outreach and building awareness of the role Nature-based Regional Parks have in the overall system.

Thank you for the opportunity to comment and we request you support these suggestions as amendments to the Regional Parks Policy plan.

Very truly yours,

A handwritten signature in black ink, appearing to read "Paul Busch". The signature is fluid and cursive, with the first name "Paul" and the last name "Busch" clearly distinguishable.

Paul Busch, President

CC: Community Development Committee Chair, Jon Commers
St. Paul City Council
Representative Erin Murphy
Senator Richard Cohen
RPPP comment box: public.info@metc.state.mn.us



Ramsey County Parks & Recreation Commission
2015 Van Dyke Street
Maplewood, MN 55109

Metropolitan Council

SEP 18 2018

Received Chair's Office

September 13, 2018

Ms. Alene Tchourumoff
Chair, Metropolitan Council
390 Robert Street North
St Paul, Minnesota 55101

Subject: Equity Toolkit and the 2040 Regional Parks Plan

Dear Chairperson Tchourumoff:

The Ramsey County Parks & Recreation Commission supports maintaining and strengthening the language in the 2040 Regional Parks Policy Plan regarding the Equity Toolkit on page 107: *"The toolkit may be used, on occasion, to reprioritize the list of capital projects as submitted by the agencies for state and regional bonds and other funding sources as appropriate and allowable."* The Ramsey County Parks & Recreation Commission is committed to supporting the Ramsey County Parks & Recreation department in the use of the Equity Toolkit.

Furthermore, the Ramsey County Parks & Recreation Commission recommends establishing comprehensive guidelines, instructions and support (such as training and mentoring) for how the Equity Toolkit is expected to be used by implementing agencies, noting that the Metropolitan Council may reprioritize projects if the toolkit is not used effectively. This would provide a measure of transparency and accountability to racial equity that is not currently present.

The Ramsey County Parks & Recreation Commission has a commitment to racial equity and recognizes that meaningful gains towards racial equity require institutionalized policies that do not leave decisions to goodwill and chance. This language must be kept and strengthened or it will be a disservice to the people of our region and the regional parks system.

The Ramsey County Parks & Recreation Commission also supports the creation of the Equity Grant Program.

BE IT RESOLVED, that on September 12, 2018, the Ramsey County Parks & Recreation Commission unanimously approved the above statement. Members present were Leah Shepard, Gale Pederson, Kong Vang, Metric Giles, Bryan Shirley, and Melissa Wenzel.

Respectfully,

Ramsey County Parks & Recreation Commission

cc: Mark McCabe, Interim Ramsey County Parks & Recreation Director

SAINT PAUL



BICYCLE COALITION

Ms. Alene Tchourumoff, Chair
Metropolitan Council
390 Robert St N
St. Paul, MN 55101
alene.tchourumoff@metc.state.mn.us

September 10, 2018

Dear Ms. Tchourumoff and members of the Metropolitan Council,

The Saint Paul Bicycle Coalition (SPBC) is committed to making the city of Saint Paul a better, easier and safer place to ride a bicycle. We do this in part because of our commitment to the environment and environmental sustainability. With this in mind, we are proposing the following updates to the Regional Parks Policy Plan.

The SPBC requests that the Parks Policy Plan contain the following updates:

- Sixty percent of Legacy Parks and Trails monies will be spent on natural resource conservation, protection and restoration (rather than on parking lots, roads and new park buildings).
- An estimate of maintenance costs will be included with all proposed new projects ...and maintenance of existing trails and facilities will be prioritized over building new ones.
- Proposed new construction projects must undergo a resource assessment by a qualified ecologist. Any built structures will be considered through a lens of "How does this support the natural resources of the park?"
- Park master plans must state a natural resource restoration goal such as acres restored or return or increase in populations of native flora and fauna such as Blanding's Turtles, Bobolinks, Long-eared Bats and Lady Slipper Orchids.
- Regional trail master plans must include a natural resource restoration implementation plan, detailing how new trails will minimize impacts on sessile and slow moving wildlife and descriptions of how any new trail can act as a wildlife corridor.
- The 80/20 rule shall be applied to regional parks as well as park reserves. How trails and the built environment fragment the 80% shall be considered, documented and a fragmentation minimization plan will be developed.

- Air, noise and water pollution will be considered with construction and maintenance activities in the regional parks. Plans for prevention and mitigation will be developed and adhered to.
- The climate change resiliency of the regional park system will be considered and documented with construction, maintenance and restoration activities. Restoration of natural ecosystems such as Prairie and Savanna will take precedence.
- Recreation activities in the regional parks shall be natural resource based. Examples include camping, picnicking, biking, hiking, swimming in natural waters, non-motorized boating, canoeing, fishing and nature study.
- Parks will increase nature-based programming directed at families, with specialization for communities of color.

We believe that the Regional Parks are constructing too much new, built infrastructure, much of it centered around automobiles, and not adequately maintaining many important trails (particularly bike trails) that they already have. We think that some of the proposed policy plan changes will improve this.

Thank you for your consideration.

Andy Singer and Ethan Osten, Co-Chairs
Saint Paul Bicycle Coalition
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<https://www.facebook.com/saintpaulbike/>

Good afternoon Mr. Chair and Councilmembers, my name is Mark Ewert, I'm the Chair of the Scott County Parks Advisory Commission, for whom I am making my testimony today. Thank you for this opportunity to comment.

In May of this year, the Parks Advisory Commission welcomed Council staff Dan Markel and Emmett Mullin along with Metropolitan Parks and Open Space Commissioners, Todd Kemery and Bob Moeller to our monthly meeting to discuss the Plan.

During the meeting, Council staff and MPOSC members shared that they had heard substantial feedback that reprioritization of Agency projects was not a useful means for advancing equity and therefore it would be dropped from the plan.

As you know, the Plan released for public input by the CDC did in fact contain language allowing Council to prioritize agency projects. On behalf of the Scott County Parks Advisory Commission I request the Council remove the project prioritization language from the Plan and replace it with the original draft language.

I and my fellow Advisory Commissioners are deeply concerned that the process to reinsert the prioritization language lacked transparency, and ignored Scott County and the other regional park implementing agencies feedback. We are also concerned that the importance of the change was mischaracterized in the dialog at the July CDC meeting as not being a big change. We are also concerned with the Council's characterization that there was a substantial dialog that led to the concept of prioritization four years ago in the development of the 2040 Plan and therefore was reason to add it back into the draft plan. In fact, there wasn't dialog on the concept. In fact, the regional park agencies were told that the 2040 Regional Parks Policy planning process was on an accelerated timeline and that there wasn't time for dialog and we were asked to trust that the Council would engage with the agencies as partners once the plan was adopted.

I'd like to share with you a few of the many steps the County has taken in support of the advancement of equity. I think you'll find that this work highlights how Scott County values this topic. Further, I think these examples highlight how the Council's attachment to using a carrot and stick approach is misguided and

unnecessary at best, and at worst is uniformed, unsophisticated, and harmful to the advancement of equity in the regional system by distracting the Council from making progress on strategies that have great potential, like the Equity Grant Program.

In 2014 the County was reviewing results of a 2013 study of Scott County residents and Park visitors. In response to this information, the County began asking questions and having dialog about the data across the operation – Why are people of color underutilizing our regional parks and trails? Why are people who have less than a High school Education greatly underutilizing our parks? From planning and customer service decisions to prioritizing projects and programs that are welcoming and accessible to all, these questions were asked and discussed, and they influenced decisions.

Here are some specific steps the county has taken in response:

- For example, the County's partnership since 2015, with a local non-profit - Let's Go Fishing Scott County - which provides boating and fishing excursions for adults with disabilities, disabled Veterans, and the elderly. This non-profit group currently stations a pontoon at Cedar Lake Farm Regional Park to run daily boating and fishing excursions, using the park as a home base. This group now serves more than 1,000 participants every summer.
- Another example is collaborative planning with the Shakopee Mdewankanton Sioux Community that has recently led to adding regional trail access to the Tribe's neighborhoods.
- In 2018 the County increased local funding in order to offer a free community event at Spring Lake Regional Park to build awareness of the park. The event planning, marketing and awareness campaign included members of our community who are involved with groups such as Esperanza a community group with considerable Latino participation.

These are just a few examples that show Scott County's commitment to continue to strive towards advancing equity in the use of regional parks and trails

I would like to take the last few seconds to circle back to the Equity Grant Program – If the goal of the of the Met Council is to advance the cause of Equity



then why not focus on a program whose sole stated purpose is to advance the cause of equity. Scott County stands ready today to ~~fully~~ engage in the conversation to fund and implement the Equity grant program. We request the Council do so in genuine collaborative partnership, with development of the program in close partnership with the regional park agencies.

Lastly council member Kramer at the July meeting stated he would support the change in part to hear what the implementing agencies had to say about It even if that response was and I quote Hey, this is a really stupid idea” Well members of the council.

Hey, this is a really bad idea.

Thank you for your time.



September 27, 2018

Ms. Alene Tchourumoff, Chair
Metropolitan Council
390 Robert St N
St Paul, MN 55101
Via email: alene.tchourumoff@metc.state.mn.us

Re: The Trust for Public Land's comments on proposed update to 2040 Regional Parks Policy Plan

We at The Trust for Public Land appreciate the opportunity to provide comment on the proposed update to the *2040 Regional Parks Policy Plan (RPPP)*. The Trust for Public Land's mission is to create parks and protect for people, ensuring healthy, livable communities for generations to come. We deliver our "Land for People" mission with the intention of addressing inequities by choosing to work in places where lack of access to the benefits of nature contributes to broader disparities, for example, in the economic or physical health of the community or region.

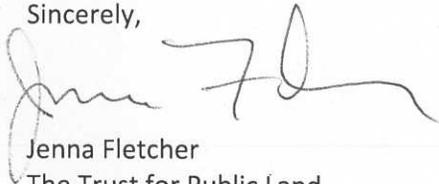
Based on a detailed review of the proposed update to the *2040 Regional Parks Policy Plan (RPPP)*, we have the following comments:

- We support future interest earnings on Regional Parks System funds to be used to increase funding for the Equity Grant Program (Chapter 2, page 27) which is consistent with feedback from MPOSC.
- The concept of bridging facilities -- introduced in the 2015 RPPP -- as a type of special recreation feature is more refined in this update. We agree that bridging facilities could introduce new users to outdoor recreation (p. 71), and that this allows room for creativity and partnership (p. 72). However, we are concerned that the requirements (p. 71, lines 13-24) are too restrictive to truly allow room for creativity and partnership. Also, we encourage Regional Parks staff to seek out such opportunities, rather than waiting for park implementing agencies to propose them. For example, the Parks Ambassador may identify new demands for outdoor recreation from groups who currently underuse the Regional Parks System. Finally, for clarity sake, we suggest that the definition of bridging facility (p. 71, lines 30-31) be repeated in the table on page 37.
- While we believe that equitable access and usage of regional parks cannot be fixed by one grant program, the Equity Grant Program -- which was proposed in the 2015 RPPP version but has been slow to be implemented -- is important, and we look forward to its implementation in 2019. We stand ready to participate in its development as a key stakeholder. Being a national parks organization focused on equitable park access and usage, we can significantly contribute given our broad perspective.
- Details of the proposed Equity Grant program are not found in this RPPP draft, but we understand that details have been moved to a separate document entitled Grant Program Guide, described as a companion document. We have not seen this made available for public review.

- We believe that the Equity Grant Program applicants should not be limited to park implementing agencies, but encourage proposals from innovative practitioners in the Twin Cities and geography-spanning organizations who work to achieve greater equitable use of regional parks.
- Our review of the prior RPPP and this proposed update was made more difficult by the lack of a strike-out version of the draft plan. For transparency sake, it will be important to provide strike-out versions in the future.
- Finally, we suggest partnering with the Minnesota Department of Natural Resources on equity initiatives since they too are working to improve equitable access and usage of parks, forests and other natural lands.

Thank you for the opportunity to comment and we appreciate your support of our suggestions that we feel will enhance our region's magnificent Regional Parks System.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jenna Fletcher', with a stylized flourish at the end.

Jenna Fletcher
The Trust for Public Land
Program Director
Community-Powered Parks Program
2610 University Avenue West
St. Paul, MN 55114

Dear Metropolitan Councilmembers, Staff, and Parks and Open Space Commissioners:

The West Side Community Organization opposes the removal or weakening of language in the Metropolitan Council's 2040 Regional Parks Policy Plan regarding the use and prioritization of projects based on the Parks Racial Equity Toolkit as noted on page 106, line 32 through page 107, line 13. Specifically, WSCO supports keeping and strengthening the concept of the following sentence:

"The toolkit may be used, on occasion, to reprioritize the list of capital projects as submitted by the agencies for state and regional bonds and other funding sources as appropriate and allowable."

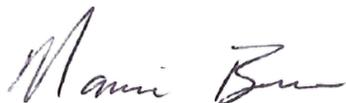
When the Equity Toolkit is properly utilized projects will arrive at the Metropolitan Council and the Parks and Open Space Commission appropriately prioritized by implementing agencies. The current language reserves the right of the Met Council to reprioritize projects when the toolkit was not used properly. Instead of removing the language the Met Council should bolster it by providing additional information to implementing agencies regarding how the toolkit should be used and what will occur if it is not employed properly. This provides a much needed level of accountability to equity. Without this accountability the toolkit and organizational commitment to equity is just for show, which is not the kind of leadership our region needs and deserves.

Accountability is one of the three principles of the Metropolitan Council's own Thrive 2040 plan. Removing the Equity Toolkit language is antithetical to that principle, leaving critical racial equity decisions up to the personal feelings of staff and council members. The attempt to remove accountability to racial equity is a dereliction of the Metropolitan Council goals and its duty to our communities which would effectively block underserved person's access to public services.

Equity is a core outcome of the Metropolitan Council's Thrive 2040 plan. The 2040 Regional Parks Plan must be accountable to the Thrive 2040 plan. According to page 38 of the Thrive 2040 plan, "Promoting equity means: Using our influence and investments to build a more equitable region". The Thrive 2040 plan further calls for policy that demands results based work towards achieving equity in all our public services. This cannot be achieved without intentional and institutionalized methods.

It is incumbent upon the councilmembers, committees, and staff of the Metropolitan Council to carry out the goals of the organization. With this in mind it is imperative that the extant language regarding the use of the Equity Toolkit is preserved and strengthened in this iteration and in the future.

Signed,



Monica Bravo, Executive Director



September 27, 2018

Written Comments submitted via email by *Wilderness in the City*

TO: public.info@metc.state.mn.us
CC: alene.tchourumoff@metc.state.mn.us
jon.commers@metc.state.mn.us

RE: 2040 RPPP Draft Update

Metropolitan Council Members,

Thank you for the opportunity to comment on the Regional Parks Policy Plan update. Wilderness in the City is a 501(c)3 nonprofit dedicated to preserving and enhancing natural urban areas through stewardship, outreach and advocacy. The inherent natural resource base of the Regional Parks System provides unique and valuable nature-based opportunities to all residents and visitors of the metropolitan region. As such, we support maintaining and strengthening the integrity of these valuable parks for high-quality, nature-based opportunities.

Preserving natural resources with an eye toward the future is critical to our region's livability, sustainability, stewardship and prosperity. The Regional Parks System represents a major, well-established conservation effort for land and water resources. With that in mind, it is disappointing to see language revisions throughout the update which erode the emphasis on the park system's greatest asset -- its valuable natural resource base.

The revised language shifts the direction for these parks toward increasing built infrastructure, and lacks language which would help assure accountability to natural resources stewardship. Conflicting language and undefined criteria leaves much of the Plan subject to interpretation, further threatening the integrity of a world-class nature-based parks system.

Managed with an eye to the future, the Metropolitan Regional Parks System can provide a comprehensive regional parks and trail system that restores and preserves high quality natural resources, increases climate resiliency, fosters healthy outcomes, connects communities, and enhances quality of life in the region with the provision of nature-based opportunities. Striving toward that goal is the basis for our comments that follow. We've identified several topics to highlight, however, not included in our comments are the many language revisions that would be better left as originally stated in the 2040 RPPP.

Increase Equitable Use

The RPPP strives to increase equitable usage of regional parks and trails, and we support that goal. Met Council's 2014 Regional Park Use Among Select Communities of Color found that *Lack of Awareness* is the number one barrier. This includes knowing what a regional park is, where they are located, how to get there, park rules, and what to do there. To help eliminate this key barrier:

- Language should be added to the Plan calling for the establishment of a collaborative and comprehensive effort for marketing and outreach. This would include all providers of parks and recreation services throughout the metro area. It would inform the public of locations, services and amenities of the entire system -- and would also inform residents that Regional Parks provide services similar to State Parks, which complement facilities and services available throughout other parts of the comprehensive system.

- Strategies to increase equitable use must start with outreach and marketing, providing transit to regional parks, and events and programs that encourage a legacy of stewardship.

Eliminate the overlap of transportation planning within regional parks

This concern was raised in the public comments for the 2040 RPPP, and we continue to oppose this overlap.

We support a coordinated trail network, however, since many regional trails also serve as commuter bikeways, it is critical that trails designed to accommodate a transportation function not be threaded through regional parks or park reserves. The design standards and year-round maintenance requirements for a commuting function result in extensive construction detrimental to a natural environment. In addition, more efficient and faster bikes with the increase in electric bikes may result in even wider corridors, kept free of snow/ice during winter months and appropriate lit, for commuting purposes, further diminishing the natural environment.

To eliminate the conflict of overlapping transportation planning with regional parks planning, revised language on page 98, lines 16-22, should state: "For trails within regional park and park reserve boundaries, recreational standards should be applied due to the natural and recreational context. Trails serving a transportation function should not pass through a regional park." It's worth noting that this suggestion better aligns with the legislative language which established the regional parks system for recreation -- not for transportation.

Engage Ecological Consultants

Ironically, the Plan encourages engagement with transportation planners, but there is no consideration given to engaging with ecology professionals. This is a serious gap for a nature-based parks system, and we encourage language that requires engaging with ecological and environmental professionals throughout the entire planning process, from master plans to project funding.

Parks and Trails Legacy Funds

Parks and Trails Legacy Funds have overwhelmingly been focused on construction of new built infrastructure within our regional parks. This will increase ongoing but unfunded maintenance expenses and is often to the detriment of natural environment, which is contrary to what people voted for when they supported the Legacy Amendment.

We can achieve the goals of the 25-year Parks and Trails Legacy Plan (including connecting people with nature and inspiring the next generation of stewards) while also enhancing the park systems natural resource base -- but that is not what's happening. To alleviate this concern, we suggest adding language to the plan requiring Legacy funded projects must include a report showing how the investment will impact the ecology of the site prior to approval of funding. Investments with Legacy dollars which negatively impact the landscape should be returned to IAs. In addition, we suggest establishment of a program similar to the DNR's Restoration Evaluation program for all Legacy approved projects.

Recreational Activities

Page 92, lines 7-14 -- Delete all. Allowing undefined "secondary or support activities" opens the door to construction of built amenities which duplicate what's provided in other parts of the overall parks system, increases unfunded ongoing maintenance expenses, and diminishes nature-based opportunities.

Master Plan Criteria

Additional criteria should be included that:

- Qualified ecology consultants will be engaged throughout the planning process.
- Following adoption of a plan, an implementation report should be provided on a bi-annual basis to help assure the Natural Resource Management component of approved Master Plans is successfully implemented.
- MRCCA rules provide for appropriate balance of development of recreation and conservation and any variances to those rules should not be encouraged or supported.

Interest Earnings

Currently undefined, we strongly encourage Interest Earnings be invested in habitat restoration and management. This would abide by state statute requiring the funds be used for the use and betterment of all regional recreational open space lands.

The Program Guide

We oppose the re-allocation of unused PTLF grants and would support the following changes which are consistent with Bond funding criteria:

- Page 11, lines 12-13: Language should be revised to state "Unspent PTLF cannot be reallocated to other projects and are relinquished to the State for future PTLF project requests.
- Page 12, lines 20-24: Same comment as above.

Page 12, lines 10-1, include language stating the various reports will be made available on the Metropolitan Council's "Parks" website for public review.

Page 43-44, c-4 / PTLF Forms: The following questions should also be include:

- How will the project improve the ecology of the regional parks system in the short and long term?
- How many acres will be restored? How many acres will be disrupted from capital improvement projects?
- What plant or wildlife species will benefit from the project?

Overall Process

The nearly year-long process for updating the master plan lacked transparency, and community engagement fell short on many levels. Going forward, we strongly encourage a meaningful process with the inclusion of all interested stakeholders and full disclosure of changes prior to final approval of this update.

Conclusion

The following language from Thrive 2040 as it relates to Stewardship should be reflected in the Policy Plan, preferably on page 1.

"Protecting and preserving the region's natural resources have long been an important part of the Council's work....The Council uses its investments in the Regional Parks System to conserve scarce natural resources, such as habitats for endangered species, fens, unique habitats, conserved prairie, wetlands, and water resources. Since its founding in 1974, the Regional Parks System has protected natural resources, including 30,700 acres of land designated as Regionally Significant Ecological Areas. "

It's our responsibility and duty to preserve these regionally significant ecological areas for future generations of people and wildlife. We urge you to re-think how these parks are being managed, and view future decisions through a natural resources lens. The result will greatly benefit all residents, now and for generations ahead.

Thank you for your consideration.

Holly Jenkins
Board President
Wilderness in the City

"The value of nature as an essential aspect of our health, creativity, intelligence, and wellbeing is often overlooked. Yet when nature is

WOMEN OBSERVING
WILDLIFE-
MINNESOTA

1790 HAGUE AVE

ST. PAUL, MN 55104



September 3, 2018

Ms. Alene Tchourmoff, Chair, Metropolitan Council
Commissioner Jon Commers, Chair Community Development Committee (CDC)
Metropolitan Council
390 Robert St N
St Paul, MN 55101
Via email: alene.tchourmoff@metc.state.mn.us, commers.jon@metc.state.mn.us

Re: Updates to the Regional Parks Policy plan

Dear Chairs Tchourmoff and Commers,

Women Observing Wildlife-Minnesota (WOW-MN) is a non-profit whose mission is: "To promote the observation of wildlife as a healthy recreational, educational, and scientific endeavor, in such a manner that does not disturb wildlife from their natural processes."

We often visit the Twin City metro area regional parks to enjoy the beauty and quiet of Nature. Hiking through Prairie, Savanna, Forest and Wetlands, we look and listen for Birds, Butterflies and Pollinators such as the Rusty-patched Bumblebee, native Wildflowers such as Purple Prairie Clover and hope for a glimpse of a Snake, Turtle, Fox or Coyote.

We value the regional parks as Gateways to Nature. Many of us recall childhoods where we could find Frogs and Snakes in our yard and see Tadpoles in the streams. As a matter of fact my family homestead was part of the basis for Fish Lake Regional Park—the park entrance road is where our dirt driveway was located. The overdevelopment of Fish Lake—a big asphalt parking lot, asphalt trails, a filled in wetland and fake sand beach has been distressing to my family, so much so that my father, who built our house, was never able to bring himself to visit the park before he died.

WOW-MN has attended Metropolitan Parks and Open Commission (MPOSC) meetings for the past three – four years and, has carefully reviewed both the original the Regional Parks Policy plan (RPPP) and the "update". We have noted a number of deficiencies in regional park planning and projects particularly with respect to protecting the natural resource base. Strategies to amend these deficiencies are contained in this document.

The strategies, which we believe are the most important amendments to the RPPP, are summarized in the first two pages with the background and justification for them in subsequent pages of these comments.

The following recommended strategies support a number of the Metropolitan Council's Thrive 2040 outcomes including Equity, Livability, Prosperity and Stewardship. They also will strengthen the RPPP goals of preserving high quality natural resources, increasing climate resiliency, connecting communities and providing a high quality of life. We ask you consider and submit a resolution to the Metropolitan Council-of-the-whole in support of these strategies.

Strategies

- 1. Finance strategy: Legacy Parks and Trails funds will be spent solely on natural resource conservation, protection and restoration or, restoring *failing* infrastructure. Legacy Parks and Trails funds will not be spent on new construction projects. (Chapter 8)**
- 2. Finance strategy: An estimate of maintenance costs will be included with all proposed projects. (Chapter 8)**
- 3. Planning strategy: Proposed construction projects must undergo a resource assessment by a qualified ecologist. The assessment will identify endangered and threatened species and their habitat. Any proposed built structures will be assessed through a lens of what will be lost and how does this support the natural resources of the park? (Chapter 5)**
- 4. Planning strategy: Park master plans must state a natural resource restoration goal such as acres restored or return or increase in populations of native fauna such as Blanding's Turtle, Bobolink or Long-eared Bat. (Chapter 5)**
- 5. Planning strategy: Regional trail master plans must include a natural resource restoration implementation plan, details how the trail minimizes impacts on sessile and slow moving wildlife and description of how the trail can acts as a wildlife corridor¹. (Chapter 5)**
- 6. Planning strategy: The 80/20 rule shall be applied to regional parks as well as park reserves. How trails and the built environment fragment the 80% shall be considered, documented and a fragmentation minimization plan will be developed. (Chapter 5)**
- 7. Planning strategy: Air, noise and water pollution will be considered with construction and maintenance activities in the regional parks. Plans for prevention and mitigation will be developed and adhered to. (Chapter 5)**
- 8. Planning strategy: The climate change resiliency of the regional park system will be considered and documented with construction, maintenance and restoration activities. Restoration of natural ecosystems such as Prairie and Savanna will take precedence. (Chapter 5)**
- 9. Recreation strategy: All recreation activities in the regional parks shall be natural resource based. Examples include camping, picnicking, hiking, swimming in natural waters, non-motorized boating, canoeing, fishing and nature study. (Chapter 7)**

¹ MN DNR, Metro Conservation Corridors, <https://www.dnr.state.mn.us/metroconservationcorridors/index.html>, viewed 6/15/18.

10. **Equity strategy: Increase nature-based programming directed at families and, with specialization for communities of color.** (Chapter 7)

Background

The regional park system and biodiversity

“Biodiversity, ecosystems and the essential services that they deliver are central pillars for all life on the planet, including human life.”²

The regional park system was established by the MN Legislature in 1975. MN Stat. 473.302 reads, “Purpose: ...**the pressure of urbanization and development** threatens the most valuable remaining large recreational open spaces in the metropolitan area at the same time as the need for such areas is increased. Immediate action is therefore necessary to provide funds to **acquire, preserve, protect** and develop regional recreational open space for public use.”³ [Emphasis added.]

The legislative language indicates the regional park system was created to preserve, protect and provide open space. Its purpose is not solely to provide recreation, but to defend the most valuable remaining spaces from urbanization and development. Even so, the Minnesota Biological Survey has documented **less than six percent** of the metro’s original land area of **native plant communities** remains **intact** today⁴. The regional parks contain vestiges of native ecotypes and habitat such as Oak Savanna, Tallgrass Prairie, Tamarack Swamp, Lakes, Rivers, Streams and Wetlands. The regional parks are also home to a number of **endangered species** or, candidates for listing- including, Blanding’s Turtle, Monarch Butterfly, Northern Long-eared Bat and Rusty-patch Bumblebee. The regional parks provide some of the best and last habitat for these creatures and many others. They are truly “Gateways to Nature”. [Emphasis added.]

The regional parks as “Gateways to Nature” are important for human mental and physical health. According to the World Health Organization, “contact with Nature may not only be associated with positive mental health benefits, but can also contribute to physical activity and contribute to overall well-being. Hence, **the design and management of green spaces in urban environments should take biological complexity into consideration** for human well-being on top of the usual considerations of biodiversity conservation that focuses on restoring the biotic integrity of ecosystems themselves.”⁵ [Emphasis added.]

The Legacy amendment

No doubt in recognition of environmental and ecological concerns, in 2008 Minnesota’s citizens voted “yes” for the Legacy amendment: “Shall the Minnesota Constitution be amended to dedicate funding **to protect our drinking water sources; to protect, enhance, and restore our wetlands, prairies, forests, and fish, game, and wildlife habitat;** to preserve our arts and cultural heritage; to **support our parks and trails;** and to **protect, enhance, and restore our lakes, rivers, streams, and groundwater** by increasing the sales and use tax rate beginning July 1, 2009, by three-eighths of one percent on taxable sales until the year 2034?”⁶ [Emphasis added.]

² World Wildlife Fund, The Living Planet report, http://wwf.panda.org/knowledge_hub/all_publications/lpr_2016/, viewed 6/4/18.

³ Office of the Revisor, MN Statutes 473.302, <https://www.revisor.mn.gov/statutes/cite/473.302>, viewed 6/1/18.

⁴ MN Dept. Natural Resources, Native Plant Community Status, <https://www.dnr.state.mn.us/npc/status.html>, viewed 6/29/18.

⁵ World Health Organization, *Biodiversity and human health*, www.who.int, viewed 6/4/18.

⁶ Office of Revisor of the Statutes, 2008 Session Laws, Ch. 151-H.F. 2285, <https://www.revisor.mn.gov/laws/?year=2008&type=0&doctype=Chapter&id=151>, viewed 1/18/17.

The overarching theme of the Legacy amendment is conservation. Most voters identified **clean water and preserving Nature** as their reason for voting for the amendment; their vision is to protect natural resources and create a next generation of stewards⁷. The Office of the Legislative Auditor (OLA) concurred, “The Legacy Amendment was originally envisioned as a way to dedicate more money to certain concerns about the state’s natural resources.”⁸

In 2009 the Legislature directed the development of a citizen-guided plan for the spending of Legacy parks and trails monies; the outcome was the “25-year Parks and Trails Legacy plan. The first guiding principle of the plan is “Stewardship: build responsibility for Minnesota’s natural resources with a particular emphasis on engaging the next generation of Minnesotans”.⁹ Citizens commenting on the plan also called for taking a “balanced approach”.

Most Legacy parks and trails money funds construction

Subsequent to the Legacy amendment’s passage citizens, including members of WOW-MN, noticed significant construction and development occurring, and being planned for, in our regional parks. Upon further investigation, WOW-MN found **83%** of Met Council’s Legacy Parks and Trails funds being spent on **new construction** and **less than 3%** on **stewardship and Nature**. The Legacy amendment states, “support (defined as maintenance, upkeep, backing, boosting and sustaining) our parks and trails”, it does not state “build new”.

Construction has many impacts on the natural world. Ireland’s *Notice Nature*¹⁰ provides a good summary of the problems including habitat destruction and habitat fragmentation. For sessile creatures construction will destroy them on site; for mobile creatures construction will disturb them and while they may be able to retreat into remnant patches of habitat, they may not find suitable harborage. Fragmented habitat may not provide enough food, water or harborage or, wildlife will be subjected to greater mortality as they try to cross a road or trail. WOW-MN members have witnessed this in regional parks; a Red-bellied Snake run over by a bicycle and egg-laying Turtles crushed by Horses. Also consider the concern expressed by Lebanon Hills Regional Park staff for the baby Blanding’s Turtles crossing roads and trails¹¹. It is important to note when an Animal is killed, it is not only the loss of that life, but the loss of its reproductive capacity throughout its lifetime. Fragmentation also allows easier entrée for invasive species.

Construction noise disturbs wildlife; the noise may force wildlife to relocate to a less secure area or impair communication that is necessary for protection and reproduction. Have you heard the chirps, calls between male and female Cardinals? These are contact calls; it is the Bird’s way of saying, “I’m here, where are you?” It is how they keep in touch. Calls, usually comprised of warnings, such as a Chickadee’s “chick-a-dee-dee-dee” also serve to warn Birds of eminent danger, a Cat, Dog, Hawk, Human or Fox. Imagine then, a Bird trying to contact its mate or chick above the din of a construction. The loss of communication may also lead to death.

Constructions wastes, asphalt, concrete and toxins often enter wetlands, streams, rivers and lakes. These pollutants impact aquatic habitats, plant life, aquatic Invertebrates—crucial for the food web and all life stages of Fish. The salt

⁷ MN DNR, Parks and Trails Legacy Plan, *Public Expectations for Minnesota’s Parks and Trails Legacy*, 2011.

⁸ Office of the Legislative Auditor, *Evaluation Report: the Legacy Amendment*, 2011, p3, <http://www.auditor.leg.state.mn.us/ped/pedrep/legacy.pdf>

⁹ MN DNR, Parks and Trails Legacy Plan, *Public Expectations for Minnesota’s Parks and Trails Legacy*, 2011, p4.

¹⁰ Ireland Department of the Environment, Heritage and Local Government, *Notice Nature*, <http://www.noticenature.ie/construction.html>, viewed 6/4/18.

¹¹ Minneapolis Star Tribune, *Naturalists thrilled at discovery of rare turtles*, Aug 30 2018.

run-off from asphalt parking lots, roads and trails has similar impacts and is making drinking water unpalatable. The US Environmental Protection Agency echoes similar concerns.¹²

Recommended amendments

Finance strategy: Legacy Parks and Trails funds will be spent solely on natural resource conservation, protection and restoration or, restoring failing infrastructure. Legacy Parks and Trails funds will not be spent on new construction projects. Chapter 8, Thrive outcome: Stewardship

Planning strategy: Air, noise and water pollution will be considered with construction and maintenance activities in the regional parks. Plans for prevention and mitigation will be documented and adhered to. Chapter 8, Thrive outcome: Stewardship

Maintenance of the built environment

Maintaining the built environment is rarely considered in park plans. According to a presentation by park implementing agencies to the 2018 Legislature, over \$100M in maintenance is needed in the regional parks, but Legislative appropriations for maintenance have remained flat at about \$3M for over three decades¹³. Nature-based recreation does not need fancy visitor centers, paved parking lots and trails, maintenance facilities, lighted signs or diesel generators (all of these items have been put into our regional parks, many using Legacy parks and trails funds). There may not be adequate funding to maintain these “amenities” or, upkeep is borne by property taxes or by raising user fees.

Recommended amendment

Finance strategy: An estimate of maintenance costs will be included with all proposed projects. Chapter 8, Thrive outcome: Stewardship

Assessing master plans and park projects

The Rusty Patch Bumble Bee (federally listed as endangered) along with the Northern Long-eared Bat and Prairie Bush Clover (federally listed as threatened) and the Blanding’s Turtle (state listed as threatened) are found in the metropolitan counties of Anoka, Carver, Dakota, Hennepin, Ramsey, Scott and Washington¹⁴.

The MN Department of Natural Resources (DNR) Biological Survey maps indicate endangered, threatened and rare species and/or suitable habitat for these species throughout the regional parks¹⁵. As you know, the regional parks are some of the last refuges for these plants and animals in the metro area. Their presence calls for heightened awareness and conscientious oversight of park activities and projects to comply with federal and state endangered species laws.

¹² US EPA, *Environmental Impact and Benefits Assessment for Final Effluent Guidelines and Standards for the Construction and Development Category*, November 2009, http://water.epa.gov/scitech/wastetech/guide/construction/upload/2008_12_8_guide_construction_files_environment.pdf viewed Aug. 12, 2015.

¹³ Solvedt A., *Operations and Maintenance Funding, Metropolitan Regional Park System, Comparison of O&M costs vs. O&M general appropriations*, presentation to the 2018 MN Legislature,.

¹⁴ US Fish and Wildlife Service, *Endangered Species Minnesota*, <https://www.fws.gov/midwest/endangered/lists/minnesot-spp.html>, viewed 4/9/18.

¹⁵ MN DNR, *Minnesota Biological Survey Native Plant Community and Rare Species county maps*, <https://www.dnr.state.mn.us/eco/mcbs/maps.html#maps>, viewed 4/9/18.

Ramsey County's Natural Resource Plan, states, ""Impacts on natural resource components should be considered in the planning, design and operation of active use areas."¹⁶ Yet, "No active surveys are conducted to locate rare species."¹⁷

In another example, in the mountain biking plan for Battle Creek Regional Park, a reference is made to minimizing impacts to natural resources, but no specifics are provided.

WOW-MN has attended Metropolitan Parks and Open Space Commission (MPOSC) meetings for the past three years. During that time we have observed the pass through of many construction projects, mostly asphalt trails. As discussed previously, regional parks contain endangered and threatened species and/or habitat to support them. Yet, this has not been discussed at any MPOSC meeting WOW-MN has attended, nor included in staff review of park or trail plans. Environmental assessment worksheets (EAW) as defined in Minnesota Rules 4410 may be required for a number of projects undertaken by park implementing agencies and by extension, Met Council. For example, MN Rules 4410.4600 subp. 27 may require an EAW for the construction of accessory appurtenant structures.

The MN Department of Natural Resources (MN DNR) has a resource assessment process they must use for every project being considered in a state park. Given the regional parks are considered the metro area's "state parks"; a resource assessment should be part of any project planning.

Recommended amendments

Planning strategy: Proposed construction projects must undergo a resource assessment by a qualified ecologist. The assessment will identify endangered and threatened species and their habitat. Any proposed built structures will be assessed through a lens of what will be lost and how does this support the natural resources of the park? Chapter 5

Planning strategy: Park master plans must state a natural resource restoration goal such as acres restored or return or increase in populations of native fauna such as Blanding's Turtle, Bobolink or Long-eared Bat. Chapter 5

Planning strategy: Regional trail master plans must include a natural resource restoration component, details how the trail minimizes impacts on sessile and slow moving wildlife and description of how the trail can acts as a wildlife corridor¹⁸. Chapter 5

Planning strategy: The 80/20 rule shall be applied to regional parks as well as park reserves. How trails and the built environment fragment the 80% shall be considered, documented and a fragmentation minimization plan will be developed. Chapter 5

Thrive outcomes: Stewardship, Prosperity, Livability

Climate change

Climate change is affecting the livability and prosperity of the Twin City metro area. Increasingly severe storms, higher temperatures, higher dew points and increased precipitation are taking a toll on Minnesota's economy and public health. "Since 1997, 32 severe weather natural disasters cost Minnesota nearly \$500 million."¹⁹

¹⁶ Ramsey County Natural Resource Plan, p12, 2008.

¹⁷ Ibid.

¹⁸ MN DNR, *Metro Conservation Corridors*, <https://www.dnr.state.mn.us/metroconservationcorridors/index.html>, viewed 6/15/18.

¹⁹ MN Environmental Quality Board, *Minnesota and Climate Change: Our tomorrow starts today*, https://www.mcknight.org/wp-content/uploads/EQB_Climate_Change_Communications.pdf, viewed 6/28/18.

Prairies and forests help ameliorate climate change by sequestering carbon dioxide. Prairies can store much more carbon below ground than a forest can store above ground. Most of the prairie's carbon sequestration happens below ground, where prairie roots can dig into the soil to depths up to 15 feet and more.²⁰ The regional parks, especially those with extensive prairies and forests are important for ameliorating climate change with carbon sequestration. And, climate resiliency is a stated goal of the RPPP.

Recommended amendment

Planning strategy: The climate change resiliency of the regional park system will be considered and documented with construction, maintenance and restoration activities. Restoration of natural ecosystems such as Prairie and Savanna will take precedence. Chapter 5, Thrive outcomes: Livability, Stewardship

Recreation in regional parks

The RPPP's Recreation Strategy 2 suggests most heavy recreational use should be accommodated in urban parks. The RPPP states "**The Regional Parks System** plays a key role in providing parks and open space for the metropolitan area. But by itself, **it cannot and was never intended to provide all** of the metropolitan area's **recreational** opportunities. The Regional Parks System is one component of the greater recreation and open space system for the metropolitan area that includes local, state, and federal parks and open space areas, as well as private sector facilities. All these other facilities and services complement those of the Regional Parks System." City parks and schools offer playgrounds, ball fields, soccer fields and tennis courts. The regional parks were set aside due to their increasingly rare natural features and provide "gateways to Nature". [Emphasis added.]

Ball fields and wide expanses of turf diminish and destroy the natural resource base during construction and maintenance. Construction eliminates the diverse plant communities needed for ecological functioning and replaces them with monocultures of non-native grasses. Ball fields and turf are maintained by mowing which destroys forbs needed by pollinating insects such as the Rusty Patch Bumble Bee and Butterflies. Mowers, leaf blowers, trimmers, turf equipment and other gasoline powered lawn equipment add air toxicants such as benzene to the air, greenhouse gases are also emitted and often pesticides are used to maintain turf.

According to the Minnesota Pollution Control Agency (MPCA), 20% of the state's air pollution comes from "off road vehicles" including lawn and garden equipment²¹. Gas powered lawn equipment emits a number of criteria pollutants including carbon dioxide, carbon monoxide, nitrogen oxides and particulate matter < 2.5 microns. In a 2011 study conducted by the US EPA, gasoline powered lawn and garden equipment emitted almost 27 million tons of air pollutants. The MPCA estimates that the overall economic cost of health effects associated with exposure to current levels of air pollution in Minnesota may exceed \$30 billion per year²².

The MN DNR and Met Council's *Park Criteria for Regional or Statewide Significance* states, "...the park should offer outdoor recreation and activities that are primarily natural resource based. Examples include camping, picnicking, hiking, swimming, boating, canoeing, fishing and nature study." The current RPPP echoes these criteria in its Recreation

²⁰ US Fish and Wildlife Service, *Iowa, the power of prairies*, <https://www.fws.gov/news/blog/index.cfm/2011/6/27/Iowa-The-Power-of-Prairies>, 2011, viewed 6/8/18.

²¹ MN Pollution Control Agency, *Air Quality in Minnesota*, 2015, <https://www.pca.state.mn.us/sites/default/files/lraq-1sy15.pdf>, viewed 6/28/18.

²² Ibid.

Strategy 1: “**Activities in regional parks must be tied to the natural resources of the parks, but not adversely affect them.**” “Activities in the regional park system should: be strongly tied to high-quality natural resources, protect the environment/ecology of the site and not negatively impact its natural resources”.²³

Yet **activities** offered in the regional parks **have strayed** significantly from these criteria and strategies. Regional parks contain ball fields, golf courses, skateboard parks and water features. These types of recreation are not tied to natural resources, do not protect the environment/ecology or natural resources in the park, but actually often degrade them, contribute to air- and water pollution, and by extension, can be detrimental to public health.

Met Council staff have discussed moving to “performance based standards” for recreation in the regional parks. These standards appear to be set by the National Recreation and Park Association (NRPA) and upheld by the Minnesota chapter (MRPA). The NRPA and MRPA are primarily recreation advocates with a focus of bringing more people to parks by increasing recreational activities in parks. A park agency can benchmark itself against other agencies and compare activities. These are the activities used in the comparison:

- Health and wellness education
- Safety training
- Fitness enhancement classes
- Team sports
- Individual sports
- Racquet sports
- Martial arts
- Aquatics
- Golf
- Social recreation events
- Cultural crafts
- Performing arts
- Visual arts
- Natural and cultural history activities
- Themed special events
- Trips and tours

Except for “natural history activities” none of the NRPA’s benchmarked activities meet the DNR and Met Council criteria and are not appropriate for Minnesota’s regional parks.

The **current RPPP recreation strategies must be** adhered to, **strengthened** and not modified to meet standards that do not meet the criteria for Minnesota’s regional parks.

²³ Metropolitan Council, 2040 Regional Parks Policy Plan.

Recommended amendment

Recreation strategy: All recreation activities in the regional parks shall be natural resource based. Examples include camping, picnicking, hiking, swimming in natural waters, non-motorized boating, canoeing, fishing and nature study. Chapter 7, Thrive outcomes: Stewardship, Livability

Equity

The Thrive Outcome of “Equity” has been given a lot of emphasis by Met Council park staff. According to Met Council’s analysis and that of the state demographer, people of color will comprise 30-40% of the working class by 2040; but, 60-70% of the working class will still be “white” and white Americans comprise 83% of taxpayers²⁴.

The 2011-2013 American Communities Survey estimated of communities of color in the Twin Cities region at 25%.²⁵ The Met Council’s 2016 visitor survey found approximately 20% of Regional Park visitors were people of color.²⁶ This indicates a difference of 5% between the average communities of color in the region and regional park usage. It is a difference that could be attributed to sampling error. A livable and prosperous region calls for healthy humans hence the desire for “equitable” regional park usage. Yet, the overbuilding of the regional parks often has an equity component that is not justified by the data.

Nature is the top theme.

Recent market research conducted by The National Audubon Society indicates nine million millennials, people of color and women are blending an interest in Birds and environmental activism. Twenty-five percent are Hispanic, 18% are African American and 10% are Asian-American²⁷.

The Met Council’s 2014 report, *Park use among communities of color* found that “Walking, playground use and swimming/going to the lake were the top three most frequently preferred activities of the focus groups”. (Inappropriately, the equity report does not include white people.) The top theme when “park” was mentioned is “Nature”. The most prominent barriers to regional park system visitation among focus group participants are: lack of awareness, time and fear/safety concerns—most often of violent crime.

Participants in the 2014 report suggested increasing awareness and diversifying programming to enhance visitation by communities of color. They also suggested more large gathering areas. Some also proposed the more intense recreational uses (basketball courts, soccer fields) that are more appropriate for city parks.

As suggested by the *Park use among communities of color* report, programming directed at families is a good strategy to increase awareness and educate visitors of all stripes about the beauty and mystique of Nature and, its importance to human mental and physical health. As National Audubon has indicated, conservation and environmental organizations are also reaching out to underserved groups; the regional park implementing agencies could collaborate do so as well.

²⁴ TaxFoundation.org, *Number of Americans Outside the Income Tax System Continues to Grow*, 2005, <https://taxfoundation.org/number-americans-outside-income-tax-system-continues-grow/>, viewed 6/7/2016.

²⁵ Metropolitan Council, *MetroStats*, October 2014, <https://metrocouncil.org/getattachment/bfc72287-2b88-49e0-96ea-2fa2ee2eb0d2/.aspx>, viewed 6/29/18.

²⁶ ISG, *Metropolitan Council: Regional Parks System Visitor Study Report*, November, 2016, <https://metrocouncil.org/Parks/Planning/2016-Regional-Parks-and-Trails-Visitor-Study-Report.aspx>, viewed 6/29/18.

²⁷ Green, P., New York Times, *The face and place of birding is slowly changing*, <http://e.startribune.com/Olive/ODN/StarTribune/PrintPages.aspx?doc=MST/2018/07/11&from=35&to=35&ts=20180711095913&uq=20180515091350>, viewed 7/11/18.

The intensely used inner city regional parks of Como, Phalen and Minneapolis Chain of Lakes with their large picnic areas appeal to those desiring large gathering areas and typically host a diverse community of visitors. (This is not to say the natural resource base of these parks should be neglected, they should be enhanced.) However, it is important to note, large gatherings of people and built up areas diminish the quality for visitors and Wildlife wishing a quiet, less disruptive and more nature- based experience.

Recommended amendment

Equity strategy: Nature-based programming directed at families and with specialization for communities of color shall be the primary focus. Chapter 7, Thrive outcomes: Equity, Livability, Stewardship

Conclusions

Humans depend on a clean environment and the wealth of physical and mental health benefits biodiversity provides. Yet, humans are rapidly destroying the basic systems we need for healthy lives. The regional parks are the Metro area's Gateways to Nature; they offer protection to unique natural features and their inhabitants and, provide mental and physical health benefits to humans. Regional parks are the "state parks" for the metro area.²⁸

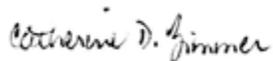
The Legacy amendment is a **conservation** amendment. It has provided significant monies to *support*, not build new in regional parks. Using Legacy dollars for the near unmitigated construction of hard surfaces is negatively impacting the natural resource base of regional parks and is contrary to citizens' intentions.

This document provides ten strategies to improve accountability to natural resources and tax dollars in the regional parks, conserve, protect and restore the natural resource base and enhance equity.

Women Observing Wildlife Minnesota believes these strategies will position the Metro region to better achieve the Thrive outcomes of Stewardship (responsibly managing financial and natural resources), Prosperity (protecting natural resources that are the foundation of prosperity) and Livability (increasing access to Nature [not hard cover] and promoting healthy communities.

We urge the Community Development Committee and the Metropolitan Council pass a resolution adopting these strategies into the Regional Parks Policy plan.

Sincerely,



Catherine Zimmer, MS Environmental Health
Executive Director
Women Observing Wildlife Minnesota

CC: RPPP comment box: public.info@metc.state.mn.us
Senator Richard Cohen
Representative Erin Murphy

²⁸ Solvedt A., Operations and Maintenance Funding, Metropolitan Regional Park System, Comparison of O&M costs vs. O&M general appropriations, presentation to the 2018 MN Legislature.

Comments from residents

The Council received written comments on the 2018 update to the *2040 Regional Parks Policy Plan* from 84 residents of the region (two comments had multiple signatories). Some of these written documents supplement testimony provided at the September 17, 2018 public hearing.

- Ahmen, Alona
- Andersen, Barbara
- Anondson, Eric
- Beer, Linda
- Blue Eyes, Joan
- Bracken, Corey
- Butel, Teresa
- Carr, Carolyn
- Chemin, Ann
- Colby, Jeanette
- Croteau, Brian
- de Gruchy, Josh
- Einess, Holly
- Fox, Michael W.
- Freeman, Pamela
- Fuller, Rebecca
- Gershone, Jerrold
- Gilbertson, Olaf
- Giles, Metric
- Gjevre, Jason
- Glover, Sam
- Goldman, Howard and Coughlin, Christine
- Grundhofer, Connie
- Hackett, Maureen
- Hajny, Benjamin
- Hanssen, Peg
- Hazen, Thomas
- Hedstrom, Barb
- Hovey, Marsha
- Jorgensen, Sam
- Karhatsu, Peter
- Kaul, Andrew
- Kenney, Rachel
- Kerr, Jon
- Koens, Valerie
- Lee, Maria
- Littlewolf, Robin
- Lutz, William
- Mandell, Paul
- Mason, Nick
- Meister, Debbie
- Mitchell, Mallory
- Moen, Pat
- Mosman, Darrin
- Nash, Janet
- Nayman, Greg
- Nesheim, Christian
- Norrgard, Lois
- Oleander, Edward
- Olson, Devin
- Passe, Mary Ann
- Paulsen, Wendy
- Pepin, Constance
- "Pewter"
- Pilgrim, Leslie
- Plimpton, Nicholas
- Pulscher, MaryLynn
- Reed, Peter
- Remer, Angela
- Rideout, Lowell D
- Rivard, Mark
- Rodriguez, Mark
- Rowse, Dianne
- Royer, Ken
- Salk, Raintry
- Schuler, Jane and Janice
- Shadrack, Anne
- Shepard, Leah
- Siasoco, Witt
- Simione, Carmela
- Stotz, Tyler
- Strate, Jeff
- Torkelson, Marilyn
- Torres, Michael
- Tunesi, Lorenzo
- Uppgaard, Heidi
- Vasquez, Maurice
- von Ende, Matthew
- Winkelman, Jenny
- Wirth-Feeney, Roberta
- Wollak, J J
- Youngquist, Jan

From: Alona Ahmen <alonaahmen@yahoo.com>
Sent: Thursday, September 20, 2018 7:34 PM
To: PublicInfo
Subject: Regional Parks Policy Plan

The priority for our regional parks needs to be natural resource restoration and preservation. Programming needs to support a natural, wildlife friendly outdoors experience. Plans need to insure the regional parks remain a safe, unpolluted by noise and chemicals, environment where flora and fauna can thrive.

Thank you for your kind consideration of the above.

Alona Ahmen

From: Barbara Andersen <barbheenandersen@gmail.com>
Sent: Thursday, September 27, 2018 2:45 PM
To: PublicInfo
Subject: Parks for nature

I heard that you are looking for input on regional parks. I've been a user and volunteer with Hennepin Parks now Three Rivers Parks. Distinguished volunteer in 1996. 1000 hours. 30 years.

We must keep Natural areas in regional parks. I mean nature should be the main thing in the regional parks. Use Three Rivers Park District's natural resources departments as the model.

Barbara Andersen

--

Sent from Gmail Mobile by Barb

From: Eric Anondson <xeoth@icloud.com>
Sent: Friday, September 07, 2018 8:57 PM
To: PublicInfo
Subject: Comment about Draft 2040 Regional Parks Policy Plan

Hello

I believe the Met Council and it's partner agencies should look at funding the conversion of municipal golf courses into regional parks. Golf courses are plummeting in popularity but residents often built homes around the green space of municipal golf courses.

An assessment of whether a municipal golf course fit a requirement of a regional park would be needed, and the cities would need to consent. And rather than spending urban dollars to preserve distant green space out of reach of lower income and racial minorities, converting select municipal golf courses to regional parks could give an opportunity to expand access to disadvantaged communities.

For example, Meadowbrook Golf Course in Hopkins and Saint Louis Park is on the Minnehaha Creek and has a man made dike holding back the lake. It was a site of recent catastrophic flooding that closed golf for years. The Meadowbrook Golf Course is owned and operated by the Minneapolis Parks and Recreation Department. Adjacent to this golf course the Minnehaha Creek Watershed District has been restoring the Minnehaha Greenway, a system of creekside marsh habitat, trails, and boardwalks.

If the opportunity arose that the Minneapolis Parks and Recreation Department decided operating a golf course in an artificially drained flood prone creek outside the city limits was no longer financially viable, I believe there should be a plan by the Met Council to acquire this golf course and convert it to a regional park and attach it to the Minnehaha Greenway as the first regional park in the western inner ring suburbs. It would also be in extremely close proximity to the SWLRT stations and extremely close to neighborhoods of racial minorities and low incomes.

But there are many other examples of municipal golf courses that could present opportunities to convert into habitat for fish and wildlife and park space for all incomes and demographics.

Eric Anondson
53 Jackson Ave S
Hopkins, MN

From: Ronald Beer <epistles2@gmail.com>
Sent: Monday, September 10, 2018 10:00 AM
To: PublicInfo
Subject: Regional parks are guided by the Met Council's Regional Parks Policy Plan,

As reported in the Minneapolis Star Tribune,.Proposed changes will expand new construction of costly infrastructure and include plans for more asphalt (along with their chemical treatments) throughout these nature-based parks.

Please, oh please, use as little chemicals in park as possible. We are losing so much of what is call nature now, world wide! We are sorry to say that our grandchildren will never know the real gifts God has given us. They will only have pictures.

But I know how this will all go. We have seen it over and over. You will do what ever you want in the name of progress and the life in nature will always pay the price. Unfortunately , we all pay the price.

Sincerely asking for mercy for nature,

Linda Beer

4672 Cambridge Drive

Eagan, Mn 55122

From: Joan Blue Eyes <irishblueeyes1591@gmail.com>
Sent: Tuesday, September 11, 2018 8:52 AM
To: PublicInfo
Subject: Lebanon Hills Regional Park & other Regional Parks

Please - Keep regional parks as Natural Spaces that preserve nature. Don't allow concrete or blacktop in them. These truly threaten natural life.

If bicyclists "need" to ram their vehicles yet another natural space where unpowered humans currently WALK, let them do so on dirt trails - NOT blacktopped, chemically infused surfaces.

From: Corey Bracken <corey@ivylongboards.com>
Sent: Thursday, September 27, 2018 4:25 PM
To: PublicInfo
Subject: Minneapolis Skateparks

I would like to show my support in the efforts of providing more skateparks for the skaters of Minneapolis and surrounding areas.

Skateboard parks provide a safe and responsible area for skateboarders and will keep them away from private businesses where skateboarding is prohibited.

The current skate parks have become rundown, unsafe and in some cases unrideable.

I am co-owner of a skateboard company here in Minneapolis and have been amazed at the positivity and community building that surrounds skateboarding in this city.

Please continue to work with skaters and local businesses on providing better and safer skate parks for our residents.

-Corey Bracken

--

Corey Bracken

651.335.6404

IVY

Lifestyle | Community | Longboards

From: Teresa Butel <tabutelx@gmail.com>
Sent: Monday, September 17, 2018 2:11 PM
To: PublicInfo
Subject: 2040 Regional Parks Policy Plan

Dear Met Council,

My name is Teresa Butel and I am a resident of Minneapolis (55406). I work for Conservation Corps MN & IA and we serve districts across all of Minnesota by performing natural resource management projects. Through my professional work and my personal recreation, I am deeply involved in equity work in the Twin Cities parks.

I ask that the Met Council continue their adopted park equity commitments. Equitable funding is important! Everyone deserves to be welcoming in the outdoors. I have concerns about the proposed changes and wish I could attend the public meeting tonight, Sept 17th. Though I have a conflict, I want to add my voice to those calling for the council to strengthen your commitment to equity in metro parks and trails.

Sometimes in outdoor industry, my organization included, we mistakenly talk about why there is less "interest" from POC communities in the outdoors but its not about interest, it's an issue of ACCESS. And access begins in the equitable policies we establish.

Sincerely,
Teresa
Resident of Longfellow, Minneapolis (55406)

From: Carolyn Carr <carolynecarr@hotmail.com>
Sent: Monday, September 17, 2018 10:11 AM
To: PublicInfo
Subject: Equity in the parks is important!

To Metropolitan Council officials,

I care about equity in the parks, and I ask that the Met Council continue their adopted park equity commitments.

Equitable funding is important! Everyone deserves to be welcomed in the outdoors.

Please strengthen your commitment to equity in metro parks and trails.

Carolyn Carr
Minneapolis 55406-3433

From: Ann Chemin <cloudbeary32@gmail.com>
Sent: Tuesday, September 25, 2018 10:28 AM
To: PublicInfo; Munt, Jennifer
Subject: Wilderness in the City

Hello,

Even though we live on the other side of town, Lebannon Hills has been a gem to visit with friends. We go there twice a month to engage in fun activities and enjoy nature.

On our side of town we go to the parks, Gale Woods Farm, Baker, Carver and others several times a week. I love that we have natural spaces at our doorstep, that we can be in the country and natural landscapes at any moment. In 40 years, the farm land that surrounds us to the west may be built up with homes, roads and other buildings. To know that we have the luxury of nature and also the farm is inspiring and also engages in continued education and the history of our land. There have been so many times I thought the city would keep a landmark, only to tear it down. I feel so grateful to our park systems for staying strong and continuing the legacy of natural lands for generations to come.

In our own backyard, it took three years after moving into our home for the wildlife to return. We have an abundance of insects, toads/frogs, birds and larger animals too. We would like all regional parks to continue to stay natural and wildlife friendly for all of us to enjoy.

Keep up the good work!

Sincerely,

Ann Chemin and family

From: Jeanette Colby <jmcolby@earthlink.net>
Sent: Sunday, September 16, 2018 12:25 PM
To: PublicInfo
Subject: Comment on 2040 Regional Parks Plan Update

Comment on 2040 Regional Parks Plan Update:

Our regional parks are beautiful and well-managed -- thank you. Humans need access to nature and green spaces for so many reasons. But we also need to be very aware of the flora and fauna we share the planet with; our survival is interdependent. Because of the critical geography of our region, please consider prioritizing undisturbed natural spaces, habitats, and migration routes in our regional parks.

Thank you,

Jeanette Colby
2218 Sheridan Ave S
Minneapolis, MN 55405

From: Crotteau, Brian <brian.crotteau@medtronic.com>
Sent: Tuesday, September 18, 2018 1:13 PM
To: PublicInfo
Cc: Commers, Jon
Subject: Regional Parks Policy Plan Update

Dear Met Council Members and Staff-

Thank you for your public service. This brief email is to outline my concerns about the regional parks policy plan update. I have read the materials thoroughly and have some concerns that I would request be included in the public record.

In general, Legacy Funds, which were intended to protect critical habitat and local nature in the form of regional parks, he been used to over-develop our regional parks in the form of buildings, roads, parking lots, paved trails. Not enough resources have been focused on acquiring open space, restoring many degraded and damaged ecosystems, ensuring wildlife biodiversity and sustainability of the populations and on low impact, low infrastructure outdoor activities.

I strongly urge the Met Council team to send the draft plans back to committee for review and revisions to include more real action and support for environmental protection and restoration including:

- Acquisition/ expansion of park lands
- Removal of invasive species
- Restoration of native habitats and biodiversity
- Low impact nature based recreation
- Fewer theme park like amenities
- No transportation planning inside regional parks
- No expansion of undefined recreational activities
- Attract hands-on users, volunteers and stewards to maintain the wildlife and ecosystem along with parks staff

As an invasive species volunteer at Hyland and Tierney Woods, an avid mountain biker and Nordic skiers, I am a frequent user of Hyland, Lebanon Hills, Gale Woods, Elm Creek and other regional parks. For my volunteer time, my company donated significant \$ back into the regional park system and I have it designated to habitat and wildlife. Thanks for consideration of my comments, and I hope you will support maintaining and expanding the parks to preserve habitat, wildlife, biodiversity and access to nature based recreation. BC

Brian on the go...

Brian Crotteau

Global Health Strategy & Innovation
Medtronic | Restorative Therapies Group | Pelvic Health
✉ brian.crotteau@medtronic.com
☎ +1-763-526-8351 ☎ +1-612-703-2375

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From: Pat Cummens <pcummens@gmail.com>
Sent: Thursday, September 27, 2018 1:02 PM
To: PublicInfo
Cc: Pat Cummens
Subject: Comments on

Dear Met Council members,

Thank you for the opportunity to speak at the public hearing on 9/17. To reinforce my verbal comments I am submitting the highlights in writing with the specific references to requested language changes. I hope you will take these to heart and take action to maintain and strengthen the unique natural resources and nature based experiences the regional parks can and should provide within the broader constellation of park experiences.

As noted in Chapter 7, the Regional Parks System by itself, cannot and never was intended to provide all the metropolitan area's recreational opportunities. What it can and does do is complement all the other parts of a comprehensive system of parks and recreation facilities by providing nature-based opportunities for recreation. Language revisions contained within the draft RPPP update will veer away from that, and move our regional parks and park reserves in a concerning manner toward duplicating amenities found in city and private recreation facilities, while lacking accountability to the integrity of the nature-based system -- resulting in a loss to the metro region.

To maintain the integrity and reach the full potential of this nature-based system, following are three suggestions for language changes:

Language in the 2040 RPPP states "Activities in regional parks must be tied to the natural resources of the parks, but not adversely affect them". This was changed to "Activities in regional parks should balance the conservation and restoration of natural resources with the provision of recreational opportunities." I am opposed to this revised language; the original language stays truer to the integrity of a nature-based parks system. And considering Spring Lake Park Reserve suffered irreversible damage even with the stronger language, imagine the future if this language is weakened. Chapter 7, page 92, lines 7-14 should be eliminated. This language opens our nature-based parks to undefined "secondary or support activities". This is a slippery slope leaving the door open to development of built amenities that conflict with nature-based opportunities. As I'm sure you'd agree simply building something -- like splash pads or skate parks -- in a natural setting does not make it nature-based, even though both are proposed at different regional parks upon approval of this policy plan.

In addition, language should be added that an assessment from a third party ecological consultant showing how the project does or does not adversely impact the natural resource base must be submitted prior to approval of project funding.

Thank you for your consideration.

Pat Cummens
Eagan, MN

Sent from my iPhone

From: Josh de Gruchy <joshdegruchy@gmail.com>
Sent: Thursday, September 27, 2018 4:35 PM
To: PublicInfo
Subject: City of Skate

Please fund skateparks! Thank you! 😊

From: Holly Einess <holly_einess@yahoo.com>
Sent: Tuesday, September 25, 2018 6:02 AM
To: PublicInfo <public.info@metc.state.mn.us>
Cc: Dorfman, Gail <Gail.Dorfman@metc.state.mn.us>; Commers, Jon <Jon.Commers@metc.state.mn.us>
Subject: Updates to Regional Parks Policy Plan

Good morning! I am SO grateful for our regional parks and the opportunities they provide me to spend time in nature. I love that within a relatively short drive from my home in SW Minneapolis I can be in any number of parks where I'm surrounded by nature and can't see any human-made structures (other than the trail I'm walking on and perhaps some signage).

Please do everything in your power to ensure our regional parks continue to be such sanctuaries! I understand that changes are under way to the Regional Parks Policy Plan that would result in more built infrastructure, bike thoroughfares, and other wildlife-unfriendly plans. Children and adults alike light up when seeing wildlife firsthand in a natural setting. **Let's give our wild kin a place to live and thrive by minimizing human impact on their habitat!**

Specifically, I support revisions to the RPPP that:

- Strengthen accountability for restoring and managing the high-quality natural resource base of the regional parks system
- Attract users and foster a legacy of stewardship through outreach, programming and low-impact natural resource-based recreation suitable for all users
- Eliminate language for expansion of undefined recreation amenities
- Eliminate any potential for transportation planning within regional park boundaries

Thank you very much for your consideration.

Holly Einess
Fulton neighborhood of Mpls.

From: FOX/KRANTZ/ IPAN <ipan@erols.com>
Sent: Monday, September 10, 2018 10:34 AM
To: PublicInfo
Subject: PARKS "INFRASTRUCTURE" DEVELOPMENTS
Attachments: WALKING MY DOG BESIDE BASSETT CREEK IN GOLDEN VALLEY MN 11.docx

Please keep our Parks natural with dirt or gravel walkways and not toxic asphalt everywhere. Bike trails with high-speed riders put pedestrian walkers , especially children and leashed dogs at risk of collision. Also no Roundup (glyphosate) and other herbicides especially toxic to aquatic life. See attached.

Dr. Michael W. Fox.

IS IT SAFE TO WALK MY DOG BESIDE BASSETT CREEK IN GOLDEN VALLEY MN?

By Dr. Michael W. Fox

Walking our dog Kota at 84 degrees F just 3 weeks after we had a blizzard here in Minnesota, we heard two or three frogs singing in a swampy pond along Bassett Creek trail in Golden Valley MN where we walk. Why so few, and rarely a dragon fly last summer?

That evening, I saw a TV advertisement promoting Bayer's (formerly Monsanto's) herbicide Roundup. This is mainly *glyphosate*, classified as a probable carcinogen and endocrine disruptor, therefore a major human and environmental health hazard yet it is used to kill weeds like the dandelion---a medicinal and most nutritious plant. The very next morning I saw my immediate neighbor, who has two dogs, spraying the dandelions on her lawn. I should take her a copy of the warning about exposing cats and dogs to such herbicides in the Morris Animal Foundation's new *Pet Cancer Prevention Checklist* brochure. (<https://www.morrisanimalfoundation.org>).

Then a month later on June 7, 2018, walking the same trail with Kota I pulled out one of her empty poop bags* to harvest the tender tops of some Sting nettles for soup (more nutritious than spinach and with more medical benefits) that grew in a few patches along the bank of Bassett Creek. I was shocked that most were wilted and dying. Then I saw a sign indicating they had been sprayed with Dow Agrosience's herbicide *Garlon 3A* the previous day by licensed applicator Minnesota Native Landscapes. This herbicide is toxic to aquatic life, is a probable carcinogen and surely causes more harm to the environment and biodiversity than do the Sting nettles. Subsequently, on the morning of June 13/18 I met two operatives with Applied Ecological Services readying to spray *Aquaneat*, which contains 53.8% *glyphosate*, along the bank of Bassett Creek fifty yards upstream from the area already treated by the other company to "control invasive weeds and stop erosion along the bank."

These eco-friendly sounding company names belie the risks of the chemicals they profitably put into the environment that June rains in particular will quickly leach into the creek and ultimately our drinking water. There is enough coming from commodity crops like GMO corn and cotton without the addition from urban and suburban agencies responsible for environmental health and integrity of ecosystems and private property owners applying herbicides where they wish. Glyphosate and other herbicides disrupt the "microbiome" of beneficial bacteria in the gut with multiple adverse health consequences including increased intestinal permeability. This may facilitate the absorption of insecticides, notably Bt toxins (see below) and neonicotinoids linked with the demise of honey bees and other pollinators.

Deformed frogs were first discovered in Minnesota ponds by school children in 1995. Investigators later found these developmental and also reproductive problems were due to herbicides and an insect growth regulator, *methoprene*. Municipal authorities use these chemicals in fresh water ponds and other standing surface water habitats to control mosquito-borne diseases

such as West Nile virus, Eastern equine encephalitis virus and Zika virus by killing mosquito larvae in the water. But they coincidentally kill other aquatic organisms that normally consume the larvae such as dragon fly nymphs and aquatic beetles. Fewer healthy frogs means fewer tadpoles to consume algae, some of which (cyanobacteria) can produce lethal toxins that often sicken and even kill dogs like Kota if she drank the water.

According to Dr. Sharon.P. Lawler** “Sustained, environmentally-safe control of larval mosquitoes is particularly needed for highly productive waters (e.g., catchment basins, water treatment facilities, septic systems), but also for other habitats to maintain control and reduce inspection costs. Common biorational pesticides include the insect juvenile hormone mimic methoprene and pesticides derived from the bacteria *Bacillus thuringiensis israelensis*, *Lysinibacillus sphaericus* and *Saccharopolyspora spinosa* (spinosad). Health agencies, the public and environmental groups have especially debated the use of methoprene because some studies have shown toxic effects on [non-target organisms.](#)”

Minnesota Metropolitan Mosquito Control*** reports that “The insect growth regulator methoprene and the soil bacterium *Bacillus thuringiensis* var *israelensis* or Bti, are the primary larval control materials. These active ingredients are used in the trade-named materials Altosid® and MetaLarv™ (methoprene) and VectoBac® (Bti). Other materials included in the larval control program are *B. sphaericus* (VectoLex® CG) and *Saccharopolyspora spinosa* or “spinosad” (Natular™ G30).” Urban, suburban and rural communities across the state are subjected to routine aerial delivery of these pesticides to control mosquitos during the breeding season, now extended with climate change. *Silent Spring* is becoming Silent World.

Bacillus thuringiensis (Bt) is also applied across Minnesota and most other states by Departments of Natural Resource and Forest Management to kill various species of caterpillars, killing non-target species in the process. This onslaught on the insect kingdom is compounded by over 35 million hectares of GMO corn and close to 4 million hectares of GMO cotton genetically engineered to produce various Bt toxins which, along with other pesticides, notably neonicotinoids that circulate through the entire plant now threaten bee and other crop pollinating insects.

The domino-effect of these chemicals means insectivorous birds, bats, reptiles and other creatures starve to death and become extinct. In the absence of those species that helped control “pests” and insect-borne diseases we become evermore dependent on pesticides to which target species quickly evolve resistance. This was the prescient concern of organic farmers who opposed GMO crops that are engineered to produce Bt insect toxins and whose judicious use of Bt bacterial applications is approved under Organic Certification; and who also predicted the evolution of ‘superweeds’ resistant to glyphosate.

Frogs and other amphibians are becoming extinct all around the world yet they and other creatures play a vital role in controlling adult mosquitos. We have the science now to identify and correct many communicable (zoonotic) disease problems, but without the will of an informed public demanding responsible government and corporate behavior with regard to public and environmental health we will surely share the fate of the frogs.

Maximizing natural biodiversity and healthier ecosystems calls for a radical revision of ways and means by public health and environmental authorities when the application of hazardous chemicals to control species categorized as dangerous and invasive have harmful consequences and have the opposite consequences of best intentions. As the most dangerous and invasive of all species some conspiracy theorists contend that such activities are part of a global program to reduce human fertility and population and create profit-driving diseases like cancer and dementia.

But there is no such conspiracy in my professional opinion and experience as a veterinarian, limnologist and entomologist (a former Fellow of the Royal Entomological Society, London); only the irony of the karma of not living in accord with the Golden Rule now morally inverted in the miasma of vested interests, deficient science and thinking and fear, best intentions notwithstanding.



Figure 1 Sting nettles dying alongside Bassett Creek 24 hrs. after application with posted signs by applicator including warning to keep children and dogs away

**Our rescued from Alabama country cattle dog Kota, like millions of other dogs, is given regular anti-heartworm medication. But for her own health reasons she is given no other insecticidal and anti-parasitic drugs. These are widely prescribed by veterinarians and sold OTC in drug and pet stores to treat and prevent internal and external parasites from hook worms to fleas and ticks we should rightly fear and seek to prevent, especially in view of the rise of tick and flea-borne diseases now accelerating with climate change. These drugs are even more widely used by the livestock and poultry industries resulting in residues in animals' excrement, along with antibiotics and other production-enhancing drugs and hormones that contaminate the environment and kill scatophagous, waste-removing insects. This disrupts the nexus of bio-cycles of ecosystem recycling and regeneration. All such excrement from treated animals should be collected for biodegradation in manure containment or non-leaching land-fill facilities. Many different chemicals and pharmaceutical products are in our dogs' feces and urine, as well as in ours, from prescription drugs to some manufactured pet food ingredients and contaminants that make such waste harmful to the organisms that make for healthful, living soils and inevitably our water quality.*



Spraying “selective” herbicides on corporate property and “diluted Roundup” on public (Scheid Park tennis courts) may well contribute to neurological and other health problems in our species and many others.

**Sharon P. Lawler Environmental safety review of methoprene and bacterially-derived pesticides commonly used for sustained mosquito control. [Ecotoxicology and Environmental Safety Volume 139](#), May 2017, Pages 335-343

*** Metropolitan Mosquito Control District
<https://www.leg.state.mn.us/docs/2018/other/180615.pdf>

SAFER HERBICIDE: [vinegar: an alternative to glyphosate? - University of Maryland Extension](#)

<https://www.extension.umd.edu/.../Vinegar-AnAlternativeToGlyphosate-UMD-Smith-...attested> that glyphosate may account for up to 90% of **pesticide** applications ... As a non-**selective herbicide**, glyphosate will kill most plants it contacts. Nonetheless, using acetic acid on weeds with tap roots (**dandelions**, Canada ... Biorganic Safety **Brands** Weed & Grass Killer - 10% acetic acid, 2% eugenol (clove oil), 2%.

The author is an Honor Roll Member of the American Veterinary Medical Association and lives in Golden Valley MN. Website www.drfoxvet.net

From: Pamela Freeman <gleskarider@gmail.com>
Sent: Tuesday, September 11, 2018 8:59 AM
To: PublicInfo
Subject: I am a user of regional parks

I use regional parks, a lot.

I ride my bike there sometimes, on paved and unpaved trails. I walk in many of the parks. I have cross country skied and snow-shoed in various parks. I go birding in the parks. I have taken master naturalist courses and done field trips in the parks, in search of prairies and other habitats, blanding's turtles and other wildlife.

I ride my horses on occasion in the parks, and they are very much a needed and becoming rarer commodity for horse trails.

I have had picnics in the parks, brought my niece and nephew to the parks.

I have gone kite flying in Elm Creek Park, ice skating in another.

I have petitioned and won to have a company summer picnic at Elm Creek for a company I once worked for.

In short, I really do use the regional park system. A lot.

And why? Because they are vestiges of nature, of prairies, savannahs, hardwood forests, and wetlands. Because I can get away from pavement and traffic and wall to wall people. Because I CAN see birds and all other wildlife that has been pushed out in other places.

Because these are islands of treasure.

And I do treasure them. As they are, natural places to go seek the quiet, mostly. Sure, I sometimes bike that quiet. Sometimes I ride my horse. Sometimes I just walk and hike. In winter, I don't whatever on my feet to help me navigate the trails. But I get out there.

I am not looking for more team sports courts and fields. I do enjoy the visitor centers, and often go look at the exhibits, even though I mostly know them all by now. I enjoy the split of bike trail and horse trails, because although one might think them somewhat compatible, my horse really does not, and if a bike rides up on us, he sometimes freaks out and tries to get out of his skin, he is so frightened. It isn't that I don't like bike riders, it is that my horse is scared of them.

They just don't always share the trail easily. And I am betting that some bikers don't care for certain piles that my horse might leave here and there now and then. They are not plentiful, you can ride around them, but some people just don't find that pleasant, I know.

Still, I can't complain too much, since at least we still have trails to ride horses on. They are becoming fewer and fewer.

I happily pay my trail fees each summer. They go to upkeep for the trails I use.

The regional parks are a gem. I have taken visitors from other cities, other countries, to our parks. They always comment on how beautiful they are, and how lucky we are to have them.
Yes, I say.
We are.

Thank you,
Pamela Freeman
Oak Grove, MN

- Pamela

Never give up on a dream just because of the length of time it will take to accomplish it. The time will pass anyway. -
Unknown

“There are some who can live without wild things and some who cannot.”

— Aldo Leopold

I am one who cannot.

From: Rebecca Fuller <raf.fuller@comcast.net>
Sent: Sunday, September 16, 2018 6:22 PM
To: PublicInfo
Subject: Regional Parks Policy Plan

The priority for our regional parks must be natural resource restoration and programming to support a natural, wildlife-friendly setting. Please do not make changes to the Regional Parks Policy Plan that will expand new construction of costly infrastructure and more asphalt! You are responsible to the people of the metropolitan area, not to the politicians, and not to big business.

Rebecca Fuller
Woodbury, MN

From: Jerrold Gershone <jrgershone@gmail.com>
Sent: Thursday, September 27, 2018 4:26 PM
To: PublicInfo
Subject: Regional Parks Policy Changes

Please do not sacrifice the natural areas in our parks for developed amenities. As our communities become more and more developed and our population continues to grow we need natural areas for our psyche and well being. These natural areas are also some of the last areas where native plant, animal and bird communities have a home. Please do not destroy these important sanctuaries. Also increased development in our parks also can have impacts on water quality, erosion and carbon sequestration through loss of trees.

Thank you,

Jerrold Gershone
[Jrgershone@gmail.com](mailto:jrgershone@gmail.com)
13111 April Lane
Minnetonka, MN 55305

From: Olaf Gilbertson <ogilbertson@couleebank.net>
Sent: Thursday, September 27, 2018 1:31 PM
To: PublicInfo
Subject: regional park plan feedback

Hello,

I have been a skateboarder for 33+ years and would like to see skateparks incorporated into the regional park plan. Not only have I seen the positive effects of skateparks as a user, I spent some time volunteering with the City of Burnsville on their recent skatepark renovation and have seen the positive results from a city perspective. In order for our parks to stay abreast of the times, a skatepark is almost a cornerstone for sustainability. The Olympics are incorporating skateboarding into the summer games and demonstrates an acknowledgement on a global perspective of how skateboarding has solidified its place within sports recreation. My experience at the City of Burnsville is that the skatepark is one of their most used park resources and I believe many other communities would have the same feedback if they were polled. As a child, I found an identity and fellowship in skateboard culture that continues to this day. I have a large circle of friends that are all professionals/tradespersons that grew up skateboarding and continue to do so to this day, often with our children. Given the opportunity, I would be happy to personally share my story with the council or any individual and advocate for some dollars to be allocated to skateparks in the Twin Cities Area. I made a short testimonial video for the Tony Hawk Foundation that I welcome anyone to view

https://www.youtube.com/watch?v=vW6UXz2iq_8

Respectfully,

Olaf H. Gilbertson

Olaf Gilbertson, CPA

Chief Financial Officer



8170 Carriage Court North
Suite 200 | Shakopee, MN 55379
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Phone: 651-698-8100 | Fax: 651-259-1233

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From: metric giles <metriccsp@gmail.com>
Sent: Friday, September 14, 2018 5:40 PM
To: Burckhardt, Yolanda
Subject: Met Council Letter Content

Thank you.

Metric Giles, Member EAC, supports maintaining and strengthening the language in the 2040 Regional Parks Policy plan regarding the Equity Toolkit on page 107: *“The toolkit may be used, on occasion, to reprioritize the list of capital projects as submitted by the agencies for state and regional bonds and other funding sources as appropriate and allowable.”* The RCPR Commission is committed to supporting the Ramsey County Parks and Recreation Department in the use of the Equity Toolkit.

Further, Metric Giles, Member EAC, recommends establishing comprehensive guidelines, instructions, and support (such as trainings and mentoring) for how the Equity Toolkit is expected to be used by implementing agencies, noting that the Met Council may reprioritize projects if the toolkit is not used effectively. This would provide a measure of transparency and accountability to racial equity that is not currently present.

Metric Giles, Member EAC, has a commitment to racial equity and recognizes that meaningful gains towards racial equity require institutionalized policies that do not leave decisions up to goodwill and chance. This language must be kept and strengthened or it will be a disservice to the people of our region and the regional park system.

Metric Giles, Member EAC, supports the creation of the Equity Gant program.

Metric Giles, Resident, supports maintaining and strengthening the language in the 2040 Regional Parks Policy plan regarding the Equity Toolkit on page 107: *“The toolkit may be used, on occasion, to reprioritize the list of capital projects as submitted by the agencies for state and regional bonds and other funding sources as appropriate and allowable.”*

Metric Giles, Resident, is committed to supporting the Ramsey County Parks and Recreation Department in the use of the Equity Toolkit.

Further, Metric Giles, Resident, recommends establishing comprehensive guidelines, instructions, and support (such as trainings and mentoring) for how the Equity Toolkit is expected to be used by implementing agencies, noting that the Met Council may reprioritize projects if the toolkit is not used effectively. This would provide a measure of transparency and accountability to racial equity that is not currently present.

Metric Giles, Resident, has a commitment to racial equity and recognizes that meaningful gains towards racial equity require institutionalized policies that do not leave decisions up to goodwill and chance. This language must be kept and strengthened or it will be a disservice to the people of our region and the regional park system.

Metric Giles, Resident, supports the creation of the Equity Gant program.

--

Metric M. Giles / Executive Director
Community Stabilization Project
501 N. Dale St. Ste: 203
Saint Paul, MN 55103
(651) 225 - 8778 Office
(651) 276 - 7348 Cell
(651) 225 - 4160 Fax
Website: <http://csp501dale.wix.com/communitystabproject>

2018 UPCOMING EVENTS

Across the Twin Cities Metro area, in cities across the state, and country, there is a shortage of affordable rental housing. The costs of rents keep skyrocketing, and families are evicted unjustly and displaced from their homes and communities daily.

IT'S TIME TO TAKE A STAND. PLEASE JOIN US.

Call: (651)225-8778 for more details.

From: man afraid <srx600guy@gmail.com>
Sent: Thursday, September 27, 2018 4:52 PM
To: PublicInfo
Subject: Skateparks

We need more skateparks. There are too many youth running around with nothing better to do than cause trouble instead of maybe having a chance to mentor other youth in getting exercise and athletic skills that can be used later in life. Especially in Minneapolis. Thank you. -Jason Gjevre

From: Sam Glover <sam@samglover.net>
Sent: Thursday, September 27, 2018 3:47 PM
To: PublicInfo
Subject: Please fund skateparks

Skateparks at Lake Bde Maka Ska and Lake Nokomis will have such a positive impact on the community.

September 26, 2018

Ms. Alene Tchourumoff, Chair
Metropolitan Council
390 Robert St N
St Paul, MN 55101
Via email: alene.tchourumoff@metc.state.mn.us

Re: The Regional Parks Policy plan

Dear Chair Tchourumoff and members of the Metropolitan Council,

Both humans and wildlife need nature. The World Wildlife Fund for Nature states, “Biodiversity, ecosystems and the essential services that they deliver are central pillars for all life on the planet, including human life.”¹ The Twin Cities metro area’s regional parks are some of last tracts of large open space representing ecosystems of prairie, savanna, wetlands and woodlands. The parks provide habitat for a great variety of wildlife including endangered and threatened species, and are important for climate resilience and represent “Gateways to Nature” recreation for humans.

Vast tracts of wildlife habitat have been lost to development here in the Twin City metro area. The regional parks now help provide habitat that is profoundly needed for wildlife, including bats, birds, turtles, foxes and more. Wildlife is sorely needed as evidence that humanity can co-exist with other species. Wildlife is sorely needed to as solace to the often asphalt-surfaced, harried day to day life of many humans. Wildlife creates part of the wonder of nature; bats, mammals that can fly and help manage Insect populations, birds, feathered jewels that sing and fly, foxes with their red fur, charming faces canny existence, and expert rodent control services, and the amazing turtle, part land animal, part water lover.

The work of animal protection groups like the Humane Society of the United States and the Humane Society Wildlife Land Trust and many others often includes rescuing animals when there are human/animal conflicts or in disasters such as climate-change induced floods and fires, and protecting wildlife and critical habitat. Maintaining, restoring and adding habitat helps protect wildlife populations and minimizes the potential for conflicts when wildlife have adequate space to call home. Maintaining, restoring and adding natural resource-based lands to the regional parks also helps with climate resiliency.

With all of this in mind, we the undersigned Minnesota residents therefore request with the update to the Regional Parks Policy plan that you do the following:

1. Retain the original RPPP language that supports and protects the natural resources be retained. Examples of deletions are below:
 - i. ~~“In addition to providing passive recreation opportunities, the park reserves also preserve, maintain and connect high quality or regionally important natural resources”~~, p14.

¹ World Wildlife Fund, The Living Planet report, http://wwf.panda.org/knowledge_hub/all_publications/lpr_2016/, viewed 6/4/18.

- ii. ~~“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, p19.~~
 - iii. ~~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, p162.~~
2. Strengthen the accountability of natural resource management, e.g.
- a. Establish a natural resource restoration goal, such as the return of a faunal element, like the Bobolink or Scarlet Tanager.
 - b. Following approval of master plans, natural resource conservation, provide for protection and restoration implementation reports at least every three years. *(Chapter 5)*
 - c. Projects submitted for funding must include:
 - i. a review by an ecology consultant from a recognized Minnesota academic institution or NGO to meet criteria of minimal impacts and,
 - ii. a summary of how the project will benefit the integrity of the parks system. *(Chapter 5)*
 - d. For regional parks, revise criteria to “Accommodates a variety of **low-impact** outdoor recreation activities” *(Chapter 4, Table 4.1)*:
 - i. Permitted low impact activities that align with the Regional Park Criteria list: minimal impact boating, e.g. kayaking, canoeing, biking to the park but not through the park on commuter trails, cross-country skiing, nature appreciation, tent camping, picnicking, and snowshoeing.
 - ii. Secondary or support activities are currently undefined. Adding amenities to a natural setting does not make an activity “nature-based.” As such, this language needs to be removed from, or must be clearly defined in, the RPPP prior to its adoption to prevent duplication of amenities such as those in city parks and to minimize conflicts with natural resource based recreation. *(Chapter 7, page 92)*
3. Nature-based recreation and education opportunities should be a recreational focus of the regional parks:
- a. Regional trails serving a transportation function should be provided around the outside of regional park/park reserve boundaries; trails within park boundaries should only provide a recreation function *(Chapter 7, Strategy 4)*.
 - b. Programming directed at families to increase awareness and educate visitors of all stripes about the beauty and mystique of nature and its importance to human mental and physical health. Many conservation and environmental organizations, e.g. The Audubon Society, Sierra Club are reaching out to underserved groups; the regional park implementing agencies could collaborate with these organizations.
4. We support **Leaving A Legacy of Nature** with:
- a. Metropolitan Parks Interest Earnings (Laws of Minnesota 2015, First Special Session, Chapter 4, Article 4, Section 138) being spent on natural resource conservation, protection and restoration. *(Chapter.5, p12)*
 - b. The use of bonding dollars for natural resource restoration. *(Chapter 8, p. 103, lines 16-19)*
 - c. Opposing use of Legacy Parks and Trails funds for any new construction projects and, funding for renovation or expansion projects must meet highest level of sustainable practice as defined by LEED certification or other comparable system. *(Chapter. 8, Strategy 3)*

- d. Assure goals of Parks and Trails Legacy Plan are met for taking care of what we have, including natural resource stewardship, and engaging the next generation of stewards.
- e. Increase equitable use of the Regional Parks System by investing in outreach and building awareness of the role Nature-based Regional Parks have in the overall system.

Thank you for the opportunity to comment and we appreciate your support of our suggestions to maintain the regional parks as high quality, natural resource based “Gateways to Nature.”

Very truly yours,

Howard Goldman
St. Paul, Minnesota

Christine Coughlin
Minnesota state director, The Humane Society of the United States
Minneapolis, Minnesota

CC: RPPP comment box: public.info@metc.state.mn.us

From: Connie Grundhofer <cgwren3@gmail.com>
Sent: Tuesday, September 11, 2018 10:11 PM
To: PublicInfo
Subject: Priority fior Regional Parks

Our regional parks should be natural resource restoration and programming to support a natural, wildlife-friendly setting.

This is our responsibility to take care of such a precious resource.

Thank you.

Connie Grundhofer

From: Maureen Hackett <maureenhackettmd@gmail.com>

Sent: Friday, September 21, 2018 6:27 PM

To: PublicInfo <public.info@metc.state.mn.us>

Cc: Munt, Jennifer <Jennifer.Munt@metc.state.mn.us>; Commers, Jon <Jon.Commers@metc.state.mn.us>; Reynoso, Edward <Edward.Reynoso@metc.state.mn.us>

Subject: Please oppose updated plan for Regional Park Policy

Dear Metropolitan Council,

Please oppose the draft regional park plan update before you on Sept 27 for the regional parks system in Minnesota. The Integrity of the natural resource base is degraded by this draft plan. This plan allows and even encourages expanded development and overlap with transportation planning. It approves "secondary or support activities" but fails to define what this means. As a result, contrary to nature-based recreation, the partnership with transportation dollars creates a much more built-out biking corridor with mini-roads paved throughout the system. This is not in keeping with nature based management. Paved trails that are to serve as bicycle commuter routes, must be aligned outside of the boundaries of the regional parks. We have seen the destruction that occurred at Spring Lake park that Dakota county caused by using dynamite to blow up a prairie bluff and they have now dried up the spring---all to get bicycle trails through the park instead of around the park boundaries. These new plan updates will continue this practice of paved mini-roads through nature when a dirt trail would do. When you use the parks for transportation infrastructure---the infrastructure build out is much harder and more extensive-- thus blowing up prairie bluffs for bicycles. This is not what people consider a nature based activity---it is instead a road through nature. To the casual use, they do not know how much was destroyed to give them a paved trail.

To maintain the integrity of the nature-based park system for now and into the future please support revisions to the park plan that strengthen accountability for the high quality natural resource base of the regional parks' system and eliminate language for expansion of undefined recreation amenities. Please eliminate the potential for transportation planning within the regional park boundaries. The current draft update removes and revises language from the original Regional Park Plan which strongly emphasizes preservation and protection of the natural resource base of the park system. I oppose the revisions made in the update which lessen the critical role of protecting and conserving the natural resource base of the Regional Parks system.

Finally, I do not support the use of legacy funds for new construction. Instead, these funds should be used as Minnesota voters had intended--to restore natural resources and programming that supports the natural environment and to repair existing infrastructure that meets sustainability standards and outreach to build awareness of the nature in our regional park system. This current plan update does not do this and will degrade the original intention of our regional park system which is to set aside natural areas for nature based experiences.

To meet the goal of maintaining the integrity of the natural resources base for the Regional parks, all project funding requests should include a report on how the project will minimize impacts and how it maintains the integrity of the parks natural resources. The implementing agencies must partner with ecology professionals throughout the master planning process to assure the stewardship of our natural resources. To often I have watch very basic ecological degradation that can be avoided by simple techniques, but they are ignored because the local governing units simply move on to the next project proposal and they do not follow the progress of plans to maintain sustainable parks. Basic techniques for plant habitat are ignored as are erosion reducing techniques. It is time to take seriously what nature we want to conserve for future Minnesotans in our public parks.

Vote no to the plan update on Sept 27.

Best regards,

Maureen Hackett, MD, DFAPA

Diplomate American Board of Psychiatry and Neurology in Psychiatry and Forensic Psychiatry
Adjunct Associate Professor, University of Minnesota Dept. of Psychiatry
Consultation-Liaison Psychiatry, Hennepin Health Care

From: Benjamin Hajny <bhajny62@gmail.com>
Sent: Thursday, September 27, 2018 12:41 PM
To: PublicInfo
Subject: Put Skateparks in Regional Parks!

Hello,

I support placing public skateparks in regional parks in Minneapolis. Cities all over the US (and even in developing nations around the world) are decades in front of Minneapolis in providing quality public skateparks. Don't male this happen in 2040, make this happen in 2020.

Sincerely,

Ben

September 11, 2018

Ms. Alene Tchourumoff, Chair
Metropolitan Council
390 Robert St N
St Paul, MN 55101
Via email: alene.tchourumoff@metc.state.mn.us

Re: The Regional Parks Policy plan

Dear Chair Tchourumoff and members of the Metropolitan Council,

The Twin Cities metro area's regional parks are some of last tracts of large, open space in our area. These tracts represent ecosystems of prairie, savanna, wetlands and woodlands. In addition, the parks provide habitat for a great variety of wildlife, are important for climate resilience and represent recreation opportunities for individuals—both residents and visitors to our area.

As the Twin Cities experiences more development and the addition of large concrete structures, it is critical to maintain our regional parks and the ecosystems they support—especially as a balance against this growth.

The updated Regional Parks Policy plan (RPPP) removes a great deal of the original RPPP language that supports and protects the natural resources which are the very basis for these parks. I would like to see an increase in the accountability of natural resource management and strengthening the integrity of nature-based recreation and education opportunities. In addition, the use of bonding dollars should target nature resource restoration and meet the highest level of sustainable practice as defined by LEED certification or other comparable system.

Thank you for the opportunity to comment and to suggest that our regional parks are maintained as high quality, natural-resource based "Gateways to Nature".

Sincerely,
Peg Hanssen

CC: Met Council Commissioner <https://metro council.org/About-Us/Who-We-Are/CouncilMembers/Council-Districts.aspx>
RPPP comment box: public.info@metc.state.mn.us

From: Tom Hazen <myliberty@comcast.net>
Sent: Wednesday, September 26, 2018 8:45 PM
To: PublicInfo; Kramer, Richard
Subject: Regional Parks Policy Plan Update

To Richard Kramer and Fellow Board Members:

My wife and I held our wedding ceremony in the amphitheater at Phalen Regional Park, with the reception following in the nearby shelter. We walk and bike around Lake Phalen quite often. We collect non-native invasive Japanese Beetles off the native plantings near the water to help the plants survive. We go swimming at the beach. We love the park, so it saddens us greatly to see the protection of nature kept at such a low priority by the Met Council.

We would like to see the Legacy funds used more for conservation of natural areas, and less for bricks and blacktop. Nature should be supported for its own existence. Currently too much money is being spent to accommodate humans to the detriment of nature.

When my wife and I walk around the park, we are dismayed to see acres and acres of land that is seldom if ever walked on by people, but yet the Parks Department still mows it regularly, destroying habitat, fostering monoculture grass, wasting energy (gasoline), and polluting the air with mower exhaust. Why not mow less and foster pollinator-friendly natural habitat more?

It's important to remember that humans are not alone in their need for habitat. Birds, insects, rodents, snakes, fish, and many other animals deserve room to flourish as well. Nature does not exist to entertain humans. It exists to play the principle and vital role in the world ecosystem upon which our very lives depend.

I urge you to value nature more.

Kind regards,

- Tom

LIBERTY INTERNATIONAL, LLC
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Thomas M. Hazen, Translation Director
695 Sherwood Avenue
Saint Paul, MN 55106 USA
Tel: 612-237-1883
Fax: 763-293-4023
Email: myliberty@comcast.net

From: Barb Hedstrom <barbscpt@gmail.com>
Sent: Wednesday, September 26, 2018 9:24 PM
To: PublicInfo
Subject: parks: funding: equity: prioritizing

Connecting people to the outdoors, to nature and recreation is something I care deeply about. In my role in community outreach and victim advocacy, I know firsthand the importance of removing barriers and creating access through out our communities. I participated in the process to develop the Equity Toolkit and my impression from those discussions, is that equity would be a lens that agencies would use when considering new programming. I fully support the need for systems to be required to always ask the question "How can we be more inclusive?" We all should be continually challenged and challenge those around us to be creating answers to that question.

However, I am concerned about the unannounced change in direction by the council involving the wording that allows the council to prioritize projects so that there is a "stick" or penalty that can be applied for failure to implement equity practices. I believe that negative reinforcement or creating pathways to punishment do not foster the open, thought provoking discussions needed to overcome serious issues like lack of equality and access. An equity lenses is important and needed unless it is used as a magnify glass that only burns what it is aimed at.

I would like to encourage you invite the parks to share examples of what they are doing o be more equitable and to create opportunities for diversity. I believe that learning about and celebrating the accomplishments creates a play book of best practices. Those best practices can be shared and duplicated while encouraging the creation of new best practices. When you invite people in to help solve a problem, you are actually being inclusive which results in many people bringing in their ideas, their experiences and the opportunity to create a new, better solution. Please reconsider the potentially policy of prioritizing funding of projects based on equity in which policy could create a lens that burns rather than illuminates.

From: Marsha Hovey <marsha.hovey@gmail.com>
Sent: Thursday, September 27, 2018 12:16 PM
To: PublicInfo
Subject: Comment for MPLS Skateparks - 2040 Regional Parks Policy

To whom it may concern:

I'm writing on behalf of adult female skateboarders in Minneapolis, and ALL current and future skateboarders in the Midwest. Hailing from Portland, OR, my former home city places so much focus on skateparks adding value to the community and the landscape. I feel very fortunate to have spent years in a place that recognizes how important skateparks are to local youth, tourism, and art! I have personally been involved with the building of concrete skateparks in rough areas like Detroit, reservations in South Dakota, tiny towns in Mississippi, and tons of other places. Every single one of those projects had an immediate positive impact in the area where they were placed. Moving to Minneapolis was exciting, but I was also very aware that I was moving to a skatepark desert. It makes no sense to me! For such a forward thinking central hub of a city, there's no reason that every neighborhood should not have one of these beautiful, captivating playgrounds for kids and adults alike. I would be happy to speak more on this topic with anyone that is willing to listen, but please understand how important this is to me and so many others. Minneapolis deserves to be a center of progression, art, and skateboarding!

Best,
Marsha Hovey



From: Sam Jorgensen <samkjorgensen@gmail.com>
Sent: Thursday, September 27, 2018 2:26 PM
To: PublicInfo
Subject: Minneapolis Needs More Public Skateparks

Council Members,

My goal is to not try to explain why Minneapolis needs more skateparks, but to push you to take a few minutes to compare our city to other US cities of similar sizes and the skateparks that these cities have.

Why is it that Fargo has a better local skatepark than Minneapolis? Why are we almost 20 years behind Denver in creating a beautifully, well-created skatepark in a downtown area? Why does Portland, a city smaller than Minneapolis, have Burnside, Ed Benedict and Glenhaven skateparks, while Minneapolis is left with tiny skateparks in the corners of Elliot, Bottineau, and Morris Parks? Are you really going to allow St. Paul to have the best skatepark (Front Street Skatepark) in the inner city, only a few miles from our beloved city? Please help us create an environment for participants of all ages, races, and background to learn, grow and create a sense of community. This is long overdue!

-Sam Jorgensen

From: Peter Karhatsu <pkarhatsu@gmail.com>
Sent: Wednesday, September 26, 2018 2:49 PM
To: PublicInfo
Subject: Regional Parks Policy Planning issues

Hi, I have some simple feedback on past and future observations I wish for you all to consider.

1. Conservation and public access do not co-exist. The latter erodes the prior.
2. Bicyclists and wheelchairs do not need access to every single park.
3. Asphalt leaches PAH and other contaminants into the ground and waterways.

My observations thus far lead me to believe you are spending money for the sake of spending it, and not with Nature as first priority as it should be. Every new forest trail you pave, every cliff face you destroy, every building you erect further chips away at an already degraded environment and removes the natural aspect of the very thing you are suppose to be protecting.

If you are now purely a public entertainment committee, then job well done. Otherwise, I respectfully remind you to protect Nature and allow people to see it as it is meant to be while honoring the Natural Life that depends on it remaining as undisturbed as possible.

Sincerely,
Peter Karhatsu
Lakeville, MN

From: Andrew Kaul <ajkaul@gmail.com>
Sent: Monday, September 17, 2018 1:34 PM
To: PublicInfo
Cc: Commers, Jon
Subject: Regional Parks Policy Plan Update

I do not support the draft plan which increases built infrastructure throughout our Regional Parks System, and lacks accountability to natural resource restoration and management. I urge you to send the draft plan back for revisions. To maintain the integrity and achieve the potential of this nature-based parks system for now and future generations, I would support revisions that:

- strengthen accountability for restoring and managing the high quality natural resource base of the regional parks system
- attract users and foster a legacy of stewardship through outreach, programming and low-impact natural resource based recreation suitable for all users
- eliminate language for expansion of undefined recreation amenities
- eliminate any potential for transportation planning within regional park boundaries

Thank you for your consideration and support of our unique, and potentially world-class, nature-based park system.

Sincerely,

Andrew Kaul
4133 Deerwood Trail
Eagan, MN 55122

From: Rachel Kenney <rachelkenney82@gmail.com>
Sent: Thursday, September 27, 2018 2:41 PM
To: PublicInfo
Subject: 2040 Regional Park Policy feedback

Hello,

I just wanted to chime in on our family's perspective of public parks. I just learned of the deadline for feedback today, so I hope my rushed comment comes across the way I want it to!

We live in Minneapolis and there are parks everywhere which is nice when you have toddlers and pre-adolescents. However, there is nothing for our kids to do in parks as they are growing up. They are 9, 10 & 14 and they ***need*** more outdoor options! Places they can meet their neighborhood friends, because it is harder and harder for kids to make friends in your neighborhood.

We are begging you to put in more outdoor skate parks! It is such an amazing sport that is nothing like it used to be perceived as. The kids that we meet at every park are usually nicer and more polite than any other kids we meet. They are more fit and have better reflexes than most and are persistent and hard working. They all have a bond that is deep and a respect for each other that is hard to explain. All of this is true even of the kids under 10!

Please consider this! We love Minneapolis and this would be a real upgrade for our city.

All the best,

Rachel Kenney

From: Jon Kerr <jon@oldmanriver.us>
Sent: Sunday, September 16, 2018 10:00 PM
To: PublicInfo
Subject: Legacy fund priorities

I am writing to express my concern about the unbalanced spending of Legacy parks and trails monies in regional parks.

It sometimes seems that the goal of some local Parks departments is to pave, build, light or otherwise manufacture projects. This may meet internal political or other priorities of planners but it is definitely not the priorities that taxpayers voted for in 2008 when they voted to dedicate funding to "protect our drinking water sources; to protect, enhance, and restore" natural areas. Moreover, this distorted emphasis on bricks and mortar projects only creates more pressure on already stressed maintenance budgets of local parks departments.

With the update of the Regional Parks Policy plan, I request the bulk of Legacy parks and trails funds be spent on conservation, protection and restoration of natural resources and that natural resources be given First priority in park management. The regional parks are the metro area's "Gateways to Nature" and must be managed as such.

Thank you for consideration of these comments.

*Sincerely,
Jon Kerr
1311 Cannon Valley Drive,
Northfield, MN 55057*

From: valerie koens <koensv3@gmail.com>
Sent: Thursday, September 20, 2018 1:45 PM
To: PublicInfo
Subject: Met Council Regional Parks Policy Plan

Please rethink any proposed changes that will include more infrastructure such as event space and more paved bike trails. Every day we lose more natural space to development of land for housing, office space, parking lots and roads. Every day, as humans, we lose more of our connection to natural spaces and wildlife. Our Regional Park Systems is one of our last remaining options for wildlife to have habitat and for humans to enjoy the natural world. There is so much in the world that is noisy, fast-paced and stress-inducing. Let's please try to hang on to the few places in our Metro area that offer an alternative to that! We already have so many event spaces from all the sports arenas both indoor and outdoor to concert venues, again both indoor and outdoor. People who want to go to events have no lack of places to go to fulfill that interest! Please - leave event space off the table for our regional parks! And the same with more paved bike trails. I'm a biker myself and I find no lack of places to bike! Do we really need more bike trails? Every time we create a new bike trail, and especially a paved trail, we destroy more habitat for wildlife. Surely that can't be the goal of the Met Council.

Please, please make it your top priority to preserve natural spaces, not to destroy them! Once a natural space is gone it is gone forever.

Most sincerely,

Valerie Koens
6340 Fir Tree Avenue
Excelsior, MN 55331

612 554 2515

From: Maria Lee <leex6173@umn.edu>
Sent: Sunday, September 09, 2018 1:29 PM
To: PublicInfo
Subject: Regional Parks Policy Plan Update

To whom it may concern,

I am troubled by subtle yet impactful language changes in the the proposed policy plan update in regards to equity in regional parks.

I am specifically concerned about how communities of color and other marginalized communities are engaged in planning and decision making about regional parks.

The language change on pages 74-75 reads:

"The regional park implementing agency shall address public concerns prior to submitting the plan or amendment to the Council. The master plan submitted to the Council shall include a summary of comments received that identifies issues raised and content resulting from engagement efforts."

This language suggests that engaging historically represented communities in planning and decision making will become a check box item that the council will look for in plans and not understand if the engagement was truly effective.

I would like to see language strengthened in this policy update so that the council can ask for more than just 'good faith efforts' to engage historically marginalized communities and work towards really building trust and relationships.

I had hopes that this routine policy update would strengthen your commitment to equity in metro parks and trails; this update, however, appears to weaken your commitment.

I urge you to revise this policy plan!

Sincerely,
Maria
Resident of Minneapolis
(zip: 55406)

--

Maria Lee
608.333.9164
Pronouns: She/Her/Hers

From: Robin Littlewolf <robinlittlewolfmpls@gmail.com>
Sent: Thursday, September 27, 2018 3:43 PM
To: PublicInfo
Subject: Skateparks!

To whom it may concern,

I have heard that the met council does not want skateparks in regional parks. I go to bde Maka ska and Nokomis quite often, I live in SW Minneapolis. This area of the city does not have many skateparks, I can think of Armatage which is very small. I don't understand why the met council would not want skateparks in regional parks? Parks are to be enjoyed and are supposed to be fun. I don't understand why you would not want to cater to the community, including the youth and other people that find passion in skateboarding. Skateboarding is great for community. If you look at places like Burnsville, St. Louis Park, Maple Grove, those cities have put in decent - good skateparks and they are always being used. The skaters there know each other, care about each other, the park is a second home if not an escape from a bad one. I know skateboarding comes with some bad connotations but those really are not true. I think providing more things to DO and be active and involved in at a park would strengthen the community. Having walking and biking paths is cool but that doesn't really bring many people together. Often biking and running are solitary things people do for exercise. I know there are running groups and the such but those would take place anywhere regardless of trails at the lakes. If you would like to improve the park then give the community something to look forward to, to care about. Skateboarders care about skateboarding a lot, if not more than anything. It is a relatively cheap activity to get into and brings people of all backgrounds, economic status, race, culture, and whatever else together. I strongly believe that skateboarders are one of the most diverse and tight knit communities you can find. Minneapolis is lacking in good skateparks and many of us Minneapolis skateboarders drive to parks in the suburbs because they are bigger and nicer built. I think that limits many Minneapolis skaters, especially kids, from getting all they can out of skateboarding. The city does not want us skating around downtown finding street spots or building DIY spots, so why not give us somewhere nice to go?! Give us something designed for us to skate!! Designed by skaters, built by skaters, for skaters. The design and build really have a huge effect on the outcome and truly skateboarders are the ones that really have the eye and the passion to do the work RIGHT. Please reconsider keeping skateparks out of regional parks. Parks are for the people!!

From: William Lutz <williamlutz10@gmail.com>
Sent: Thursday, September 27, 2018 2:55 AM
To: PublicInfo; Barber, Deb; Mullin, Emmett; Marckel, Daniel
Subject: COMMENT ON REGIONAL PARKS POLICY PLAN

Dear Met Council Commissioners:

Our family visits Lebanon Hills often and enjoys the wide open spaces and the wildlife habitat which these spaces provide.

We learned that your 2040 draft Regional Parks Policy Update includes vast expansions of hardscape and other trails, blacktop, etc., in Lebanon Hills and other regional parks, and we write to urge you to please not proceed with the planned expansion of paved trails and spaces in Lebanon Hills Regional Park or other regional parks.

The Parks already provide more hardscape and paved surfaces than are needed. Indeed, in the case of biking, riders already have more than enough biking trails already. Adding more just because you can doesn't mean that you should. To the contrary, Lebanon Hills, for example, is a place where less paving and hardscaping will be better because:

- it prevents the destruction/reduction of critical habitat which supports important wildlife and plants (e.g. the recently discovered Blanding's turtle, an endangered species already);
- it prevents the fragmentation of open spaces which compounds the removal of habitat;
- it prevents the serious safety hazards of bikes speeding along trails, which is a very real hazard for pedestrians, wildlife, and other users;
- it would align with the revelations from the book *Last Child in the Woods*, which identified "Nature Deficit Disorder" and showed from a growing body of research that direct exposure to nature (not paved trails or hardscape) is essential for healthy childhood development and for the physical and emotional health of children and adults.

Once you begin ripping out space for a trail and hardscaping through the middle of Lebanon Hills and other regional parks, you have changed things forever, and no amount of after-the-fact restoration will ever reverse this misdirected assault.

There's still time to stop this plan. Please do so. Now. Thank you.

The Lutz Family
Victoria, MN

September 17, 2018

2040 Regional Parks Policy Plan

Review Comments by Paul Mandell, 8320 Cleadis Ave., Inver Grove Heights, MN, 55076

I have a serious concern that much of this version of the Plan for Regional Parks argues too much for a capital budget plan for infrastructure and amenities focused on construction of active, 'nature-based' recreational facilities, which usually carry both higher capital costs and more costly maintenance tails. The big question in my mind is then this: When the implementing agencies all too often, and based on my experience in at least Dakota County, have yet to commit the necessary financial resources to reverse the on-going degradation of our existing natural resources in the parks, Met Council's Plan will bring more demands on county budgets already stretched beyond capacity to maintain what we already have.

I was encouraged to read in Chapter One proposed additional language to text under 'Stewardship', strengthening current language found in 'Thrive 2040 Additional Direction for 2040 Regional Parks Policy Plan'. However, I would like to see the new language supplementing the original, stronger language, not as a replacement; and would prefer to keep the term "directives" rather than 'direction' (a minor but possibly important difference).

If accessibility is an issue, then we might want to look more holistically at those populations who might be seeking those kinds of experiences found only in the BWCA instead of merely re-creating in our regional parks just more of what might already be available in city or other local parks. Lebanon Hills Regional Park for one offers comparable canoe and outdoor experiences and all within an hour drive of the most points of the metro areas' underserved populations.

To overlook this valuable kind of experience not found in local parks in favor of creating just more of what those same local parks already or more appropriately can offer is troubling to me as one who wants to see our natural areas properly restored using best practices and with a regular dedicated budget, and as a taxpayer who sees lack of accountability.

In Chapter Two, as well as in Chapter Five on Financing, I would like to see a more clearly enunciated policy that spells out in detail the breakout and authorization of just where and how Legacy monies are supposed to be used, as well as a detailed accounting of how much goes toward 'development' and how much goes to purely restoration of existing natural resources, along with an examination of the discrepancy, especially in light of the spirit of the law creating the Legacy program.

Transparency demands nothing less; and, in my mind, this plan needs to establish a means of holding both Met Council and all implementing agencies accountable with measurable benchmarks the public can see and use to be more confident that monies are being spent appropriately. A requirement for bi-annual reports to the public following adoption of a master plan showing implementation progress to help assure natural resources stewardship is neither neglected nor shortchanged of the financial resources and efforts necessary to turn around the prevalent state of degradation would be a good first step.

In Chapter Three, despite numerous references to high quality natural areas, the plan repeatedly, in the interest of increased attendance numbers, advocates for more active, developed facilities that would drain budget for the implementing agencies that are already strained. The goal of increasing visitation should be achieved through means which first and foremost respect the natural resource, such as public transportation options to parks, outreach, programs, etc

I believe there are inadequate means in the plan to guarantee the quality of restoration of the often- mentioned natural areas nor is there adequate criteria for any kind of check or public review for the implementation of master plans; leaving stewardship and restoration at the discretion of agencies. This gap in the Plan needs to be resolved prior to adoption.

In fact, given the current condition of the natural resources in our regional parks, I believe it's time that our implementing agencies' spending reflected more 'balance' between financial commitments to infrastructure and/or new construction and the restoration of natural resources, if they ever intend to actually win the battle against loss of habitat.

In addition, there seems to be only cursory examination of the multiple levels of government and their respective park offerings, setting up a case where our regional parks are being asked to add facilities that might easily duplicate those already present in some local parks, further diminishing the effectiveness and efficiency of our budgetary processes. My fear, given the draft plan, is that our Regional Parks are heading in the direction of becoming all things for everyone and, as a result, becoming nothing for anybody. If nothing else, given the information in Chapter Three, I would argue that based on size and extent of natural resources and unique habitats, that Lebanon Hills should be reclassified as a Regional Park Reserve.

In Chapter Five, regional park implementing agencies are encouraged to include transportation and transit planners, as well as local and state units of government in development of master plans, but ecology consultants should also be included. It also calls for a commitment to a public engagement process that "requires opportunity for the public to be heard and to have influence over contents of the master plans". Where is the enforcement of this measure of engagement, and what happens when public engagement opposes plans put forth? As we learned from the Lebanon Hills 2013 Plan, public engagement in and of itself must be more than a box to check off. If such public input is supposed to have influence, where is the proof? The chapter also calls for a Natural Resource Inventory (NRI) focused on restoring and maintaining high-quality natural areas, addressing the capital costs of such restoration work.

In Chapter Seven, Strategy 1, the list of activities deemed appropriate for regional parks since the '70s seem fully appropriate at a regional scale, and the Plan states that secondary activities are supposed to compliment these primary uses. 'Secondary activities' however, goes largely undefined, leaving far too much potential for excessive development that may prove contrary to the primary uses or, worse yet, detrimental to those high-quality natural areas so rarely available anywhere within reach of metro residents. At a minimum, such 'secondary uses' should be required to be low impact, and if developed, be required to employ best practices in avoiding negative impacts on existing environment.

Before advocating for more programmed uses to serve under-served or under-represented communities, any plan should examine not just current uses favored by these populations but look to future desires of those same people, especially given the stated concerns for climate resiliency and unparalleled value of natural resources given trends of urbanization, heat islands, and other climatic impacts.

To this point, in Chapter Seven, Strategy 4, (Trail System Coordination), while calling out MN Rules 8820 for regional trails, the Plan specifically recommends that when such a trail passes through a Regional Park, recreational standards (v. those of State or Federal standards due to funding streams) should be given a priority due to the natural and recreational context. Clear direction must be included in the Plan stating that regional trails planned as commuting corridors serving a transportation function are not appropriate within a regional park/park reserve context. Trails planned within park boundaries will only serve a recreation function.

In summary, I think this Plan needs to do the following:

- Clarify that natural areas in Regional Parks that provide a unique experience for all in the metro area must not be jeopardized by the addition of those uses that are or can be provided thru local or other park systems,
- Must include an inventory of those needs not currently being met in Regional Parks but which may already exist or could with funding be met elsewhere in the metro park systems and if so, where, avoiding duplication and waste of limited resources,
- Lastly, once and for all, establish metrics that can guarantee appropriate standards for restoration of natural areas and the necessary commitment to funding of such purposes before calling for competing programs or uses that will then detract from serious commitments needed to take proper care of what we already have before introducing new things.

From: Nick Mason <nick@bikemn.org>
Sent: Monday, September 24, 2018 9:21 PM
To: PublicInfo <public.info@metc.state.mn.us>
Subject: Bike trail system in metro plan

The importance of a network of great trails in our metro parks cannot be overstated. Metro trails in parks give commuters access to a low cost, low stress network that most people prefer. Additionally, as our metropolitan area works towards equity, it is critical that our park systems emphasize trails that give people of all ages, abilities, and backgrounds a place where they can have access to free physical activity as a part of daily lives.

Best,

Nick Mason
Deputy Director, BikeMN

--

Nick Mason | he/him
Deputy Director | League Cycling Coach
P: 612.986.6096



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From: Debbie Meister <dmeister.mmc@gmail.com>
Sent: Wednesday, August 29, 2018 4:13 PM
To: PublicInfo <public.info@metc.state.mn.us>
Subject: Comments regarding Legacy spending and regional parks

To the Metropolitan Council Board,

I am concerned about the unbalanced spending of Legacy parks and trails funds in regional parks. As a voter and supporter of the Legacy Amendment, I know the intent was for conservation not construction of hard surfaces such as parking lots and maintenance facilities.

With the update of the Regional Parks Policy plan, I request the bulk of Legacy parks and trails funds be spent on conservation, protection and restoration of natural resources and that natural resources be given First priority in park management. The regional parks are the metro area's "Gateways to Nature" and must be managed as such.

Sincerely,

Debbie Meister
dmeister.mmc@gmail.com
1312 Portland Ave
St. Paul, MN 55104
651.647.6816

From: Mallory Mitchell <mitch925@umn.edu>
Sent: Monday, September 17, 2018 9:16 PM
To: PublicInfo
Subject: 2040 Regional Parks Policy Plan Comment

Hello!

I care about equity in parks. I ask that the Met Council continue their adopted park equity commitments. Equitable funding is important! Everyone deserves to be welcomed in the outdoors.

Language is important in policy-making. Please do not weaken equity-related policies already in place in the old plan by altering or omitting language that protects equity in the regional parks system.

Also if they could stop scheduling public meetings at 4pm on work days when much of the public is busy that would be helpful.

I look forward to future meetings that I can attend.

Warmly, Mallory
Resident of Seward Neighborhood Minneapolis

From: e <patmoen@aol.com>
Sent: Monday, September 10, 2018 8:02 AM
To: PublicInfo
Subject: Regional Parks Policy Plan

After reading today's letter to the editor, I concur that the Regional Parks Plan must reflect the need to protect wildlife, including the Blanding turtles. The park should reflect strong environmental considerations. Restoration and programming needs to reflect the importance of preserving the natural habitat.

Surely there must be a way to route bike paths to avoid this conflict.

Sent from AOL Mobile Mail
Get the new AOL app: mail.mobile.aol.com

From: Darrin Mosman <darrin.mosman@gmail.com>
Sent: Thursday, September 27, 2018 1:24 PM
To: PublicInfo
Subject: 2018 REGIONAL PARKS POLICY PLAN UPDATE

To Whom IT May Concern:

JUST A FEW REASONS WHY MPLS COMMUNITY NEEDS A SKATEPARK

#1 – Skateboarding is the 3rd most popular recreational activity for kids between 6 to 18 years of age. While team sports participation has consistently declined, skateboarding has millions of participants. Yet, most communities do not have a dedicated space for Skateboarders.

#2 – Skateboarding is a healthy, physical activity that anyone can enjoy. Childhood obesity has more than tripled in the past 30 years in the U.S, with more than one third of children and adolescents being overweight or obese.

#3 - Skateparks provide a safe and legal place for Skateboarders to practice their sport. Statistics show that the majority of deadly skateboarding accidents involve a motor vehicle. Offering diverse terrain and a quality Skatepark means less Skateboarders on your streets, at your local businesses, parking lots and sidewalks.

#4 – Skateparks can provide great revenue opportunities for their communities. A destination style Skatepark attracts skaters from all over the United States, which in turns means increase in lodging, shopping, meals as well as other local recreational activities. Remember typically, it's not just the skater coming to the area but an entire family. Depending on the Skatepark design and size, there is also opportunity to hold events, competitions, etc. drawing even bigger crowds.

#5 – Skateparks bring communities together. They are a social gathering place offering its users the opportunity to meet with other community members with similar interests. We often see entire families at the Skatepark, some users and some just enjoying the show. It is common for young skateboarders to volunteer for Skatepark cleanup and take ownership of the space.

Sincerely,

Darrin Mosman

From: Janet Nash <janetnash@yahoo.com>
Sent: Monday, September 10, 2018 8:36 AM
To: PublicInfo
Subject: Lebanon Hills and Blanding turtles

I sincerely hope your policies regarding regional parks makes a priority for species recovery/preservation (as in this turtle finding) over public access biking/ asphalt paving through this park.

With climate change upon us, every effort needs to be made to preserve these precious native species to utilize the wonderful resources that regional parks provide.

Biking trails can be developed in other areas but nuturing Blanding turtles cannot.

Sincerely,
Janet Nash
2115 East 34th Street
Minneapolis 55407

Sent from my iPad

From: Greg Nayman <gmnayman@kcl-group.com>
Sent: Monday, September 10, 2018 2:04 PM
To: PublicInfo
Subject: Destruction for bike paths

To hell with bike paths that destroy God's work. Too much asphalt and development, and way too busy is the Met Council in facilitating the Council's vision of how parks should be. Learn to let it be.

Greg Nayman
1635 Hillcrest Ave.
St. Paul, MN 55116
651-698-1527

From: Christian Nesheim <cnesheim@gmail.com>
Sent: Thursday, September 27, 2018 5:14 PM
To: PublicInfo
Subject: We Want Skate Parks

45 Year old resident here. We need skate parks. Keeps kids like I used to be out of trouble and protects property value. The parks can be very beautifully designed as well.

Christian
Registered Voter



Virus-free. www.avast.com

From: Lois Norrgard <lnorrgard01@gmail.com>
Sent: Thursday, September 27, 2018 11:00 AM
To: PublicInfo; Elkins, Steve; Senator Melissa Halvorson Wiklund; rep.andrew.carlson@house.mn; Tchourumoff, Alene
Cc: Catherine Zimmer
Subject: Regional Parks Policy plan comments

September 27, 2018

Ms. Alene Tchourumoff, Chair

Metropolitan Council

390 Robert St N

St Paul, MN 55101

Via email: alene.tchourumoff@metc.state.mn.us

Re: The Regional Parks Policy plan

Dear Chair Tchourumoff and members of the Metropolitan Council,

In today's world so much of our natural areas are being paved over, lawned over, and otherwise degraded. This is happening in our local communities – the microcosm of this problem, as well as in our amazing large federal refuges and forests - the macrocosm. Over 20 years ago I finally woke up to this travesty and decided to change careers from being a small business owner in the graphics field to working for our Earth – environment. I have been dedicated to this endeavor and find a passion in making sure our wild and natural areas are protected, maintained and enhanced for wildlife, nature-based recreation, and eco-services ever since. These are life needed amenities like the clean air we need to breath, water to drink, and our soils.

As you know the Twin Cities metro area's regional parks are some of last tracts of large open space representing ecosystems of Prairie, Savanna, Wetlands and Woodlands. The parks provide habitat for a great variety of Wildlife, are important for climate resilience and represent "Gateways to Nature" recreation for humans.

I support the following comments regarding the updates to the Regional Parks Policy plan (RPPP).

1. A strike-out version of the draft plan was not provided to the public diminishing transparency and access for citizens to see what was changed in the update. **I ABSOLUTELY OPPOSE THE PROPOSED CHANGES.**
2. The updated plan removes a great deal of the original RPPP language that supports and protects the natural resources which are the very basis for these parks. For example:
 - i. ~~"In addition to providing passive recreation opportunities, the park reserves also preserve, maintain and connect high quality or regionally important natural resources", p14.~~
 - ii. ~~"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, p19.~~
 - iii. ~~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, p162.~~
3. We advise **strengthening accountability of natural resource management**, e.g.
 - a. For projects using Legacy monies, a natural resource restoration goal, such as return of a faunal element, like the Bobolink or Scarlet Tanager is stated and strived for.

- b. Following approval of master plans, natural resource conservation, protection and restoration implementation reports are provided at least every three years. *(Chapter 5)*
 - c. Projects submitted for funding must include
 - i. an review by ecology consultant to meet criteria of minimal impacts and,
 - ii. a summary of how the project will benefit the integrity of the parks system. *(Chapter 5)*
 - d. For regional parks, revise criteria to “Accommodates a variety of **low-impact** outdoor recreation activities” *(Chapter 4, Table 4.1)*
 - i. Permitted low impact activities align with the Regional Park Criteria list: minimal impact boating, e.g. kayaking, canoeing, biking to the park but not through the park on commuter trails, cross-country skiing, Nature appreciation, tent camping, picnicking, and snowshoeing.
4. We advise **strengthening the integrity of Nature based recreation and education opportunities:**
- a. Secondary or support activities are currently undefined. Adding amenities to a natural setting does not make an activity “nature-based”. As such, this language needs to be removed from, or must be clearly defined in, the Policy Plan prior to its adoption to prevent potential duplication of amenities such as those in city parks and to minimize conflicts with natural resource opportunities. *(Chapter 7, page 92)*
 - b. Regional trails serving a transportation function should be provided around the outside of regional park/park reserve boundaries; trails within park boundaries should only provide a recreation function *(Chapter 7, Strategy 4.*
5. We support **Leaving A Legacy of Nature** with:
- a. The use of bonding dollars for natural resource restoration (Ch. 8, p. 103, lines 16-19)
 - b. Opposing use of Legacy Parks and Trails funds for any new construction projects and, funding for renovation or expansion projects must meet highest level of sustainable practice as defined by LEED certification or other comparable system. (Ch. 8, Strategy 3)
 - c. Assure goals of Parks and Trails Legacy Plan are met for taking care of what we have, including natural resource stewardship, and engaging the next generation of stewards.
 - d. Increase equitable use of the Regional Parks System by investing in outreach and building awareness of the role Nature-based Regional Parks have in the overall system.

In our over-busy, over-developed, frantic-paced world it is more important than ever to have real nature to find solace and rejuvenation in. We have so many options for paved – and built amenities (like paved trails, skate parks and ball fields), schools provide these, city parks provide these, the regional parks should be a step above and provide the nature-based elements people really need today. Funding should be directed to control of invasives, enhancing natural biodiversity, and wildlife protection. And nature based programs to introduce diverse local communities to what the world around us means and is. Please do NOT continue your recent legacy of paving and built structures. I oppose and will work to influence the legislature against any funding going towards these types of projects.

Thank you for the opportunity to comment and I appreciate your support of our suggestions to maintain the regional parks as high quality, natural resource based “Gateways to Nature”.

Very truly yours,

Lois Norrgard
10368 Columbus Circle, Bloomington MN 55420

CC: Met Council Commissioner steve.elkins@metc.state.mn.us
RPPP comment box: public.info@metc.state.mn.us

Senator Melissa Wiklund
Representative Andrew Carlson

From: Edward Oleander <rncalleded@gmail.com>
Sent: Thursday, September 20, 2018 6:00 AM
To: PublicInfo
Subject: Parks policy plan update

Dear Madam/Sir,

As a taxpayer, I am concerned that my money be spent ethically, fairly, and most of all, wisely. For this, transparency is key. Any lessening of transparency, even incidental and accidental, can cast a shadow on the use of taxpayer funds.

I note some ambitious goals for the 2040 plan with regards to acreage and trail mileage, but nowhere do I see any of the projected numbers for financing these goals. The funding for Council projects is extremely complex. This alone makes the funds more vulnerable to misuse or fast-and-loose redistribution.

A citizen like myself has little chance of ever completely understanding the tangle of laws and regulations surrounding the acquisition and distribution of public funds. Taking out the financial data from the information readily available makes it impossible. This reflects badly on the Council, even if done for legitimate reasons. Just sayin...

Sincerely,
Edward N
Maple Grove

"That which you seek is never where you find it." ~ Oleander ~

"We are the ones we've been waiting for." ~ Barack Obama ~

"Preserve up the useful operate." ~ Dr. Robert Nkomo ~

From: Devin Olson <devo_25@hotmail.com>
Sent: Monday, September 24, 2018 11:22 PM
To: PublicInfo <public.info@metc.state.mn.us>
Subject: Met Council 2040 feedback

Hello,

There should be a large focus of the 2040 plan on regional off-road biking and permanent place for kids to ride their bikes. Money and resources need to be allocated to the addition of these types of amenities. These types of trails will draw and retain a quality workforce, foster the sense of nature to their users, and promote an active lifestyle through programming and programmed initiatives.

For reference please refer to Bentonville, Arkansas to see how they have embraced mountain biking and used it a primary driver for tourism and creating an amazing community/region. You can use this link to get started, but please take a closer look to get a better understanding of what they have done: <https://www.visitbentonville.com/bike/>

Another great resource is right in our area, Minneapolis Bike Parks has been working with the Minneapolis Park and Rec Board to bring biking options to the general public.

www.mplsbikeparks.org

Thank you for your time!

From: Jessica Ostrov <tzelah@hotmail.com>
Sent: Friday, September 21, 2018 9:21 PM
To: PublicInfo <public.info@metc.state.mn.us>
Subject: CDC Comments

To whom it may concern:

I've attached my CDC comments (read aloud at the hearing). If I had more time to prepare, I would have included a request to show the public a list of changes or some other way to indicate them...unless a person is able to sit down with the old and new, side by side, and go through them with a fine toothed comb, is there a way to know what the changes are, and their ramifications?

Also, 4pm on a workday is inconvenient for working folks. I am a school teacher, and tried at least 7 subs before I could find one to cover my responsibilities so that I could make it to the hearing. Please consider holding these meetings a little later (even 5pm would be helpful) so that it is more equitable for people who work.

Thanks so much!
Jessica

Read aloud to Met Council's Community Development Committee
Monday, September 17, 2018

By Jessica Ostrov

The importance of safe, green public spaces is critical to public health, both physical and mental. Over and over, statistics show that park users are overwhelmingly white ~ quite concerning for the overall health of our society in the region. I represent many citizens concerned with equity and inclusion in the parks. It is of the utmost importance that the wording in the parks plan, related to equity, be preserved and even enhanced, as it pertains to funding, programming, staffing and the development of historical and cultural sites that showcase the remarkable stories of marginalized groups in the area.

I am extremely concerned with racial profiling in the parks. My son is mixed race, his father is from Ghana, and after the unthinkable incident that occurred this summer in Minnehaha Falls Regional Park, I no longer feel safe allowing my son to bike to the parks on his own, in fact, it terrifies me.

I want to share that I have been a student, and am currently faculty, at Hamline University with an equity focus in the Natural Science and Environmental Education graduate program. In the 6 years I have been involved with this program, only about 3% of the students have been of color. Not connecting people of all backgrounds to nature, early and often, results in a lack of people of color working in fields related to environmental education, preservation, conservation and restoration.

I serve on the Outreach and Inclusion committee for YMCA Camp du Nord, located near Ely, MN, and roughly 90% of our campers are white as well ~ a statistic that we are working hard to change. If POC aren't connecting with nature here, it is unlikely to drive 5 hours for a camp experience. The success of the parks in this region have a ripple affect throughout the state. The crowd here today reflects the same statistics. People will not advocate for the outdoors if there is no connection to it.

I urge the council to preserve the language, strategies and goals, along with greater transparency and accountability in plans and spending related to equity and inclusion in our very diverse region.

Thank you.

From: Maryann Passe <maryannpasse@yahoo.com>
Sent: Thursday, September 27, 2018 12:47 PM
To: PublicInfo
Cc: Commers, Jon; Chavez, Steven
Subject: Regional Parks Policy Plan Update

Regarding the Regional Parks Policy Plan Update,

Please record that **I DO NOT support the draft plan**. It is written not in full support of the natural environment for which our Regional Parks were designated by the MN State Legislature, but instead to allow for an increase in built infrastructure within our parks!

I ask you to reject this plan and ask for the following revisions:

- Wording that strengthens the foundation of our parks system is the restoring and managing high-quality natural resource base of our Regional Parks System.
- Wording that strongly supports park management plans that promote park usage through programming, outreach, and minimal impact nature based recreation for everyone.
- The elimination of ambiguous language that allows for unspecified “amenities.”
- Absolutely REMOVES any allowance for transportation routes and plans within our Regional Parks.

I ask you to reject this plan and ask for revisions that clearly present the overriding message of this Park Policy Plan update as:

- Natural Resource management with accountability.
- Low-impact, nature-based recreation within our Regional Parks, which are our regions designated nature-based parks system as the MN Legislature intended.
- Prioritizing a legacy of nature rather than one of built infrastructure

I urge you to reject this plan because it violates the integrity of our Regional Parks System by allowing an overlap with transportation planning and the allowance for unspecified (therefore unlimited) built-infrastructure amenities

- Our Regional Parks were NOT intended to be used for transportation corridors.
- Every person in our metropolitan region **DESERVES** to have access to nature-based parks. Counties, cities, and communities have many parks with sports fields, swimming pools, skate parks, golf courses, etc. Regional Parks **MUST** be **REGIONALLY MANAGED** to provide everyone the **ADDITIONAL** opportunity for large expanses of nature and low-impact nature-based activities.

I DO NOT support the use of Legacy dollars for new construction.

I DO support the use of Legacy dollars for natural resource restoration, programming to support a natural environment, repairs to existing infrastructure in a manner that meets criteria for highest standards of sustainability, and outreach to build awareness of the regional parks system.

Thank you for your consideration and support of what should and can be the jewel of our Metropolitan Region's world-renown park system.

Sincerely,

Maryann O'Connell Passe
1249 Balsam Trail E, Eagan, MN 55123

612-414-1667

From: Tom Passe <passe.tom@gmail.com>
Sent: Wednesday, September 26, 2018 9:30 PM
To: PublicInfo
Cc: Chavez, Steven; Commers, Jon
Subject: Public comment for Regional Parks Policy Plan update

Please accept my written comment for the Regional Parks Policy Plan update.

Considering the vast amount of changes proposed by this "tweak" update, there is no question the process should have been transparent and inviting for all stakeholders to be part of the decision making process, and that hasn't happened.

COMMUNITY ENGAGEMENT

- Thrive states that Equity includes "engaging a full cross-section of the community in decision-making".
- MC's public engagement Plan states: "The region needs the full range of voices at the table to understand issues, explore alternatives, and create a shared action plan to address issues." [Public Engagement Plan, p. 1]

But that's not what happened. Instead:

- Voices at the table included Met Council staff and Regional Park Implementing Agencies; select conversations were held with 70 individuals from underrepresented communities, and a non-scientific survey was conducted with 100 park visitors who were not representative of overall park users.
- Missing from the table were Regional Park advisory body's, several community groups and other members of the public. These stakeholders may not always be from an underrepresented community, but they still deserve a seat at the table.

TRANSPARENCY

The reported summary of changes to the draft plan was not comprehensive, and a red-lined version of the draft update was not available, making it nearly impossible for the general public to review the many changes that were made. Most concerning are changes made to language regarding natural-resource base of the parks system. For example, page 8 of the red-lined draft shows revisions to the definition for "Stewardship". Language describing the extent and quality of natural resources was deleted and language referencing highway infrastructure and transit investments was added. Lacking an opportunity to compare to the original language, it's hard for people to fully appreciate the shifting direction this update brings to the Regional Parks System. And so it goes throughout the entire plan.

The red-lined version shows a substantial amount of language regarding the administrative details for grants and funding was deleted. That language was moved to a separate document, the Program Guide, which has not been made available for public review. Among other things, the program guide contains information relating to Implementing Agencies ability to change projects and amend grants -- yet these critical processes were not made available for public review.

Overall, on Community Engagement and Transparency, the Regional Parks Policy Plan falls short and I encourage a more meaningful approach going forward.

Thank you for your consideration.

Sincere regards,

Tom Passe
Eagan, MN

From: Wendy Paulsen <paulsen.wendy@gmail.com>
Sent: Tuesday, September 25, 2018 9:59 PM
To: PublicInfo; Commers, Jon; Melander, Harry
Subject: Regional Parks Policy Plan Update

I want to express my opposition to the draft plan because it increases built infrastructure throughout our Regional Parks System, and lacks accountability to natural resource restoration and management. I urge you to send the draft plan back for revisions.

I do not support expanded development and overlap of parks with transportation planning, which are allowed and encouraged by this Update. The Regional Park System was not created to serve as an extension of the transportation network. The transportation network should bring people to enjoy the peace, wildness and wildlife of the parks, and not be designed to pass people quickly through them.

A new revised plan should:

- strengthen accountability towards management of natural resources within the Regional Parks System;
- focus on low impact recreation opportunities for all - such as supporting adaptive equipment rather than changing park designs
- leave a legacy of Nature instead of more built infrastructure

The draft update removes and revises language from the original RPPP which strongly emphasized preservation and protection for the natural resource base of the park system. This is concerning, especially because a red-lined version showing changes was not available which would have provided greater transparency.

I am opposed to these revisions made in the update which diminish the critical role of protecting and conserving the natural resource base of the Regional Parks System. Public engagement for this draft update involved a very small and select group of individuals; this continues to be a disturbing trend for key stakeholders who are not given opportunity to be part of the process.

Equitable means equal for all, not just those who aren't using the parks. I urge you to engage with all interested parties as this and future RPPP updates move along.

I **DO NOT** support the use of Legacy dollars for new construction. I **DO** support the use of Legacy dollars for natural resource restoration, programming to support a natural environment, repairs to existing infrastructure in a manner that meets criteria for highest standards of sustainability, and outreach to build awareness of the regional parks system.

To maintain the integrity and achieve the potential of this nature-based parks system for now and future generations, I would support revisions that:

- strengthen accountability for restoring and managing the high quality natural resource base of the regional parks system (ecology consultants should be part of the entire process)
- attract users and foster a legacy of stewardship through outreach, programming and low-impact natural-resource based recreation suitable for all users
- eliminate language for expansion of undefined recreation amenities
- eliminate any potential for transportation planning within regional park boundaries

Thank you for your consideration and support of our unique, and potentially world-class, nature-based park system.

Sincerely,

Wendy Paulsen
14070 St. Croix Trail North
Stillwater, MN 55082

From: Constance Pepin <cpepin@bitstream.net>
Sent: Sunday, September 16, 2018 3:58 PM
To: PublicInfo
Cc: Commers, Jon; Dorfman, Gail
Subject: Please revise the Regional Parks Policy Plan

To the Metropolitan Council Members:

I strongly oppose the draft plan because it increases built infrastructure throughout our Regional Parks System and lacks accountability to natural resource restoration and management.

To maintain the integrity and achieve the potential of this nature-based parks system for now and future generations, I support revisions that:

- Ensure accountability for restoring and managing the high quality natural resource base of the regional parks system
- Attract users and foster a legacy of stewardship through outreach, programming and low-impact natural resource based recreation suitable for all users
- Eliminate language that would allow expansion of undefined recreation amenities
- Eliminate any potential for transportation planning within regional park boundaries I urge you to send the draft plan back for revisions that will protect, not exploit, our natural resources for all.

Thank you for your consideration and support of our unique, world-class, nature-based park system.

Sincerely,
Constance Pepin
4031 Zenith Ave S
Minneapolis, MN 55410

From: pewter1of6 <pewter1of6@yahoo.com>
Sent: Monday, September 10, 2018 2:10 PM
To: PublicInfo
Subject: Regional Parks

To Whom It May Concern:

I read with dismay the plans to expand new construction of infrastructure and adding more asphalt (with chemical treatments) throughout our park system.

Why can't wild stay wild?

Our parks should focus on natural plants, wildlife friendly settings, and a place for peace in our already overly stressed environments both in this city and this planet.

The city of Mpls already seems to be set on cutting every blade of grass down to 1/8 inch and not allowing any "wild" plant to survive in any setting they deal with! Luckily some home owners are already going "prairie". Look around - wildness can also be beautiful. One can walk and bike on asphalt throughout our town -- why can't park goers walk on grass and wood chips and enjoy some quiet time.

Let the turtles, wildlife, insects and butterflies have some areas too -- too much emphasis on People -- the environment is already being destroyed -- please don't be part of it!

Thank you.

From: lespilgrim@juno.com
Sent: Thursday, September 27, 2018 1:05 PM
To: PublicInfo
Cc: Kramer, Richard
Subject: Fw: Regional Parks Policy Plan Update

please note this version as the asterisk is present in this version.

----- Forwarded Message -----

From: "lespilgrim@juno.com" <lespilgrim@juno.com>
To: public.info@metc.state.mn.us
Cc: richard.kramer@metc.state.mn.us
Subject: Regional Parks Policy Plan Update
Date: Thu, 27 Sep 2018 18:02:03 GMT

Greetings Met Council:

With nearly two million acres, an area the size of Yellowstone National Park, lost to development each year; 62,500 sq miles (40 million acres and counting) converted to suburban lawn in the U.S. (which is over 8 times the size of New Jersey dedicated to an alien plant); 100 million acres invaded by alien plants (a number that is expected to double in the next five years); and an estimate by state natural heritage programs stating that as many as 33,000 species of plants and animals are imperiled in the U.S. (neotropical migrants have declined in population 1% per year since 1966), it is clear to see why our natural areas are more important than ever before.* Our regional parks are precious and rare green spaces that need to be protected, revered, invested in, strengthened, and well stewarded. As environmental stewards, you are all aware of the disruption human passersby (pedestrian and bike) pose to wildlife, nesting birds, animal behavior (such as foraging at night rather than day). Research indicates wildlife disruption within 150 feet of human presence.* I could continue with the facts. There is ample evidence to support the need for our ecosystems to be preserved and cared for.

With this email I am asking you all to consider that we need our natural areas to be natural. Because our natural world and wildlife are slipping away. And because humans are not separate from the natural world. I feel comments like mine may become marginalized or maligned as human needs inevitably trump wildlife needs. Multiple access points through our natural areas, the built world, and undefined recreational amenities have somehow become the focus of the Metropolitan Council rather than fostering a legacy of stewardship through outreach, programming, and low-impact natural resources based recreation. Rather than focus on built infrastructure in our parks, we need to focus on and truly understand the ecosystem function of all of our regional parks and be smart and thoughtful about how we integrate humans and nature, as well as humans with nature. So, let's strengthen accountability for the restoration and management of our precious regional park system. Let's prioritize low impact programming over the built world (after all, our youth need to connect with nature more than ever as "screens" now dominate their lives). Let's prioritize protection and preservation of our regional parks. Let's provide not only a transparent process, but an overly transparent process.

A low-impact, nature-based park ecosystem will benefit today's youth and families, and all park visitors. Please send the draft plan back for revisions.

Respectfully,
Leslie Pilgrim
Mendota Heights

*source information gladly provided upon request.

From: Nicholas Plimpton <plimptonn@gmail.com>
Sent: Wednesday, September 12, 2018 1:11 PM
To: PublicInfo
Subject: plan comments

I really liked the regional parks policy plan draft update. I especially appreciated use of the term "Latinx" and the emphasis on increase the park systems inclusivity.

Thank you.

Nick P

From: MaryLynn <marylynnmpls@gmail.com>
Sent: Wednesday, September 26, 2018 9:13 PM
To: PublicInfo
Subject: comments on the 2040 parks policy plan

Hello MPOSC staff,

I wanted to encourage all of your planning staff to read the book, “No Place To Go: How Public Toilets Fail Our Private Needs” by Leslie Lowe, and to then follow her advice to explicitly call out in planning documents – like the 2040 Parks Plan – the need and requirement for public toilets.

Her research shows how the lack of public toilets negatively impacts the mobility of families with young children, people with disabilities, people who have a care attendant, people with Krohn’s disease, our elders population, and more. The lack of toilet facilities impacts people’s choice of transportation, it impacts where people shop & recreate, the length of time people will spend in a given location (including parks & trails), as well as general cleanliness and water quality. Read the book & I think you will be persuaded (or reminded) about the importance of public toilets.

Implementing agencies that own and operate connecting trails should be working together to assure there is a network of restrooms available to the millions of park visitors. Restrooms should be available year around, even if winter use means porta-potties have to be brought in.

Also, please mandate that new regional park & trail lighting be Dark Sky certified (we need to see the stars! To experience darkness!), that new buildings follow Audubon guidelines for bird safe design, and whatever you can do to help mitigate noise pollution – either from buildings in the parks (quiet AC units) or from the surrounding spaces (roads, or MSP airport).

Operationally, please use your influence to ensure implementing agencies are reducing their chloride use.

I am encouraged by the new category of “bridging facility” (great idea!) and I hope the MPOSC will secure and dedicate a new funding stream to this effort.

Moon Palace Books has copies of ‘No Place To Go’ in stock if you want to read it this weekend

Thanks for listening,

MaryLynn Pulscher
5124 35th Ave S
Mpls

Sent from [Mail](#) for Windows 10

From: reedx001 University of Minnesota <reedx001@umn.edu>
Sent: Monday, September 10, 2018 1:24 PM
To: PublicInfo
Subject: Parks

I am inspired to write by the letter from Holly Einess that appeared in Monday's (9/10/18) Star Tribune concerning regional park. I live across from Bda Mka Ska/ Calhoun, and have frequently walked at Lake of the Isles, so know these two urban parks well. I also pass Lake Harriet and used to run around it daily. Harriet and Calhoun have both seen substantial additional paving and building. Some of this may be justified by the other change I have observed, that all three are used by ever increasing numbers of people. The other observable change is that the amount of wildlife using these lakes and their environs has greatly diminished.

While it is wonderful to have accessible parks where city dwellers can walk, bike, run, kayak, sail, fish, skate, ski, hold marches and concerts, and anything else one can think of, the loss of places where urbanites can feel closer to nature and observe various forms of wildlife is a shame. Time was one could not walk around Isles without seeing at least two herons and two egrets. No more. Calhoun hosted numerous bird species, at least during migrations. Herons and egrets just don't use it anymore, loons are rare, even Canada geese are diminished. These lakes are so heavily trafficked that wildlife eshew them.

Perhaps this diminution is inevitable with the Minneapolis chain of lakes, and they are treasures for city dwellers. But their value in an urban setting is enhanced if they retain some of their natural heritage, so thought should be given to how paving and building is done. And more outlying areas, like Regional Parks, really should be protected. Finding rare Blandings turtles in Lebanon Hills Regional Park is a triumph, but such moments will occur less and less if we don't take care. And once gone, they are gone forever.

Regarding every "improvement" in the form of building or paving is easy, but we need to think deeper and for the long term. These lakes offer a connection with the region's natural history, and a chance to preserve a home where species no longer ubiquitous can be observed by the growing human population. A diarama in the Bell Museum is no substitute to watching the take off of a great blue heron. Wildlife have been remarkably adaptive in surviving urban sprawl, but they need help. Planners should make the needs of wildlife a central condition as they plan the development of regional parks.

Peter Reed
2950 Dean Parkway
Minneapolis, MN 55416
612 825 7680

From: Angela Remer <remer.angelak@gmail.com>
Sent: Monday, September 24, 2018 3:45 PM
To: PublicInfo <public.info@metc.state.mn.us>
Subject: Regional Parks Policy Plan

To whom it may concern,

The current draft plan that increases built infrastructure throughout the Regional Park System is troubling. This plan takes the needed focus around natural resource restoration, management and education way. The parks are meant to provide nature based recreational opportunities and this plan is not in alignment with this focus, therefore I encourage you to send the draft plan back for revision.

Considerations for plan:

- encourage restoring and managing the current natural resource base
- introduce programming and natural resource based recreation to foster education and stewardship

Sincerely,
Lebanon Hills Frequent Visitor
Angela Remer
3623 St. Francis Way Unit C
Eagan, MN 55123

From: Lowell Rideout <rideoutld@gmail.com>
Sent: Thursday, September 13, 2018 2:59 PM
To: PublicInfo <public.info@metc.state.mn.us>
Subject: Protecting the Blanding Turtles

I am a birder . . . and a turtle lover since the age of 8 (I'm now 70). Just this: Please do all in your power to safeguard the future of the Blanding at Lebanon Hills Regional Park. I've never been there (yet) but would love to know that someone with Minnesota's future in mind had the foresight to assure the next generation our present joys.

Bless you,
Lowell D Rideout
Plymouth MN

From: Mark Rivard <rivardart@gmail.com>
Sent: Thursday, September 27, 2018 2:56 PM
To: PublicInfo
Subject: Skateparks!!!

FUND Skateparks!!!! It's 2018, we are the host city of the largest skateboard contest on Earth, and we have the worst skateparks/capita in the country. It's embarrassing!

FUND SKATEPARKS!!!!

Thank you!
Mark Rivard

Rivard Art LLC.
20 6th St NE
#511
Minneapolis, MN 55413
612-599-9756

www.MarkRivardArt.com
www.RivardArtEducation.com



From: Mark Rodriguez <mrod@3rdlair.com>
Sent: Thursday, September 27, 2018 11:27 AM
To: PublicInfo
Subject: Fund public Skateparks

My name is Mark Rodriguez and I own 3rd Lair SkatePark in Golden Valley, MN. As a lifelong skateboarder and owner of a business that works to provide a quality skatepark experience to the residents of MN, I am emailing today to ask that the Met Council set aside funds and space in the upcoming parks plan to fund high quality public skateparks across Minnesota. As a state we have a very high rate of Action Sports participation (much higher than most) yet we are plagued by underfunded, poorly designed skateparks that pale in comparison to those offered throughout the U.S. Skateboarding is a growing sport that will be in the Olympics in 2020. This sport is very appealing to youth, teenagers, and families alike. These sports also appeal to participants from many backgrounds bridging the gap between socio economic class, race, lifestyle, and more. These sports will continue to grow around the world and it is crucial that Minnesota do everything possible to not only keep up, but to become a leader and benchmark for others to follow (as is the Minnesota way). I hope you are able to take this request under consideration and help Minnesota become the leader in Action Sports that the state is meant to be.

Thank You

Mark Rodriguez
President
3rd Lair SkatePark & SkateShop
850 Florida Ave South
Golden Valley, MN 55426
612 702 2245
Intagram: @3rdlair
Twitter: @3rdlair
Facebook: 3rd Lair SkatePark & SkateShop

From: Dianne Rowse <dianne.rowse@gmail.com>
Sent: Wednesday, September 26, 2018 9:35 PM
To: PublicInfo
Cc: Commers, Jon; Chavez, Steven
Subject: Comments on Regional Parks Policy Plan Update

To: Metropolitan Council

Re: Regional Parks Policy Plan Update

I do not support the draft plan, which increases built infrastructure throughout our Regional Parks System and lacks accountability to natural resource restoration and management. The natural resources in our parks are the basis for the high value I place on these parks. Please act now to protect and grow these resources for future generations of park users. Please send the draft plan back for revisions.

I would like to see revisions that:

- *emphasize accountability for restoring and managing the high quality natural resource base of the Regional Parks System

- *encourage low-impact natural-resource based recreation through education & programming, which all leads to a healthier population

- *eliminate language for expansion of undefined recreation amenities

- *eliminate any potential for commuter bicycle transportation within and across the regional park boundaries

Where parking lots are needed, please use porous materials instead of creating more impervious surfaces. Add pollinator-friendly landscaping and interpretive signage so visitors can learn about the great natural resource protection efforts.

These Regional Parks are most valuable when they can provide access to nature at its most basic. No splash pads or jungle gyms needed; kids can be creative and active in nature's playground.

Thank you for your efforts and support of our wonderful nature-based park system.

Sincerely,

Dianne Rowse

10704 Prescott Ct.

Burnsville, MN 55337

From: Ken Royer <kenjeanroyer@yahoo.com>
Sent: Tuesday, September 11, 2018 6:28 PM
To: PublicInfo
Subject: Lebonon Hils Park

Please protect this precious Park by maintaining its natural state ; do not put pavement type trails through it!!

Sent from my iPhone

September 27, 2018

Dear Chair Tchourumoff,

This document serves as a public comment submission on the draft 2040 Regional Parks Policy Plan. I write to you as resident of Saint Paul and Ramsey County. I am also a professional in the field of parks and recreation resource management with over thirty years of experience. I have two advanced degrees in the field and have worked in park settings at the national level, the municipal level, and the non-profit realm. I am also a former Council employee, my resignation effective September 26, 2018. I am, by the way, the **fifth** parks-related staff person to leave within a year. (Mind you, there are only 8 FTEs, including management, whose primary responsibility areas fall into the park domain.)

I wish to submit my comments on the draft policy plan because I am deeply worried about the long-term viability of the Regional Parks System. This letter will spell out many of the reasons for my worry, grounded in, and based upon, the policy plan.

State statute underpins my comments. The Metropolitan Council's statutory obligation is to provide for "regional recreational open space for public use", "providing for a balanced system of public outdoor recreation for the metropolitan area". The focus here is recreation and the public.

Often staff, advisory body members, and Council members suggest the Council should defer to the local experts, the regional park implementing agencies, for regional park related matters. The Council, in fact, has a legacy of deferring to local experts to author draft policy language. While localized knowledge is important, the Regional Parks System is a regional system. However, if local experts are the primary source to inform regional policy, what you have is policy that both caters to and creates local-level outcomes. The system, by its very existence, is to provide park and trail amenities that are used by visitors from across the region and beyond. You don't have a need for a regional park system, if visitors are primarily from local communities.

Your draft plan notes visitors to regional parks and trails are increasingly local residents (See page 60). The local share of visits, in fact, has drastically increased over the last 20 years. Play this trend out a bit and the justification for the Regional Parks System as a whole comes into question—Essentially, if this data trend continues, the Council will be funding certain parks and trails used by local residents at the exclusion of other parks and trails used by local residents. How will you justify to the residents of the region the use of regional tax dollars to fund a subset of local parks and trails?

To add to this issue, the system plan, described in detail in **Chapter Three** of the draft plan, is slated to add 669 miles of regional trail in the next several decades. Your own visitor study highlights current regional trails exhibit the largest disparities across race, ethnicity, income, disability status, gender, and educational attainment as compared to population in the region. In sum, current regional trail users are primarily highly educated, affluent, white men. The growth of the regional trail system will exacerbate the disparities at the regional-level, given trails will account for a greater share of visits to the system overall. In essence, your system plan undermines your own equity goals. It should also be noted your trail build out will not only result in greater disparities across the system moving forward, but the

system will also undergo a sharp increase in the share of local visits, given trails typically serve a more local audience. Therefore, not only will the trail build-out result in greater disparities in regional park system use, but it will also serve as a potent justification for the undoing of the regional parks system. Why, you ask? Again, outside arguments could be made that the Council has failed to achieve its statutory obligation of providing outdoor recreation open space to the region if the System fails to serve a regional audience and is not used by a large cross section of the metropolitan tax base. This is already happening, as evident by your own data (See page 60), and the trail build out will exacerbate it immeasurably.

Let's be clear here and connect the dots, Council policy contributes to these trend lines via their own policies. The **Siting and Acquisition policy**, on pages 64-66, provides criteria for adding new parks and trails to the region. The criteria for additions to the regional trail system are weak and only very loosely tied to your statutory role of providing for regional recreational open space. For instance, the only requirement focused on recreation notes a proposed new trail serve "a regional audience based on visitor origin and service-area research on regional trails". Play that out a bit. The trail doesn't exist, so you don't have visitor origin data. What you are left with is service-area research on regional trails. What this means is that grounds for new trails, from a recreational demand perspective, will be a combination of "are there people in the area?" and "how many people use similar existing trails?" Even if you add all the other criteria specified in the policy plan it still exhibits a lack of controls placed upon what types of amenities can be added to the system. It's a "build it and they will come", a "go big or go home" philosophy. And it will cost the public billions of dollars to have all these trails come online. Another disconcerting element of what can be brought into the regional parks system is that there is no policy on removing parks and trails from the system. There is no mechanism to omit a system element from the system based on poor performance. What happens when you realize you have a trail search corridor and the demand, public support, or need has fallen off? The policy plan is mute on this, which means you will still have to fund it, regardless of whether the public wants it because it is included in your system plan.

Another policy that threatens the viability of the regional parks system is the **Recreation Activities and Facilities- Strategy 1: Balance conservation and recreation**. The policy for strategy 1 was changed from the 2015 version. The old version stated "activities in regional parks must be tied to the natural resources of the parks, but not adversely impact them." The new draft states "activities in regional parks should balance the conservation and restoration of natural resources with the provision of recreational opportunities". From a policy perspective what the new language actually means is that an activity must conserve or restore natural resources in order to be permitted. I don't know a single recreational activity that conserves or restores natural resources while it is in pursuit. Even the most passive recreational pursuits have an impact on the landscape. For instance, bird-watching can harden the soil, cause trail erosion, disturb ground cover, among other landscape impacts. A literal interpretation of the policy would equate to the only permitted activity being volunteering to remove invasive species on site. Or, an alternative read could mean that if you are going to do activities that have an impact on the landscape, you are also going to have to balance that with giving back before you depart by doing some restoration work. If you remain with this language, your hands are tied and the public would have

grounds to demand limiting all recreational opportunities since none of them conserve or restore natural resources.

The policy **Recreation Activities Strategy 1** content goes on to specify allowable activities in the regional parks system. It is important to note there is no statutory basis for excluding certain outdoor activities, yet the Council rigidly maintains a policy that only passive, nature-based recreational activities are allowed within the regional parks system. What we know is that those activities attract and serve certain subpopulations in the region better than others. In fact, for the last several years, the Council's engagement and research with residents of the region have consistently illustrated a sharp contrast between the desires and preferences of residents of the region and what the regional parks system provides. To ameliorate this issue, new policy language was added in the draft plan. Page 92 reads "Support facilities could serve specific users and communities, augmenting the desirability of the primary facility...further study and development of performance criteria to encourage both innovation and preservation of character is an ongoing commitment of Metropolitan Council staff in coordination with park agencies, other partners and stakeholders." Performance criteria? For what? Natural resources quality? Non-recreational use? Satisfaction of existing users? Conflict among users? The new language is so murky, imprecise, and ineffectual that a reader has no idea what it means. Further, if you play the language out, what would implementation look like? I am a trained professional in this field and I have no idea what this means, nor do I understand how it would be implemented. The new language is not the guarantee of sound policy that I would be looking for to ensure that allowable recreational activities meet the needs and desires of the public. Nor does the policy commit to accommodate popular and high demand activities the public has long been requesting.

The reality is the regional parks system is not an idyllic wilderness, brimming with virgin forests, pristine waters, native prairies, and lush habitat for rare and threatened species. If you were to inventory the ground cover of the 54,000+ acres, you would likely find that a greater percentage of the system is comprised of turf grass, invasive species, and pavement than high-quality natural resources. (Are there amazing areas in the system of high-quality? Sure, no denying. But, if you asked any expert, they'd tell you it's not how you can characterize the system as a whole.) So, why do you have recreational policies that are tied to resources that don't exist in relative proportion? There are huge swaths of non-native turf grass in regional parks, yet people are not allowed to play organized sports in them because those activities are not a nature-based activity. You have families across the region expressing they'd travel to regional parks if there were splash pads, but they aren't allowed. We know that park use declines drastically among 12-18 year olds, yet many activities pursued by that age group (e.g., soccer, skateboarding, etc.) are not allowed. Why?

The Council should support a wide swath of outdoor recreational pursuits that suit the residents of this region. Not only should you, but it is your actual role. How could you accomplish this with relative ease? This could be possible through adopting a classification system that creates "activity zones". These systems are widely employed by other park agencies across the nation. Examples of classification systems include the Recreation Opportunity Spectrum (used by federal recreation providers), wherein park zones are classified across a continuum of primitive to highly developed, and each is managed differently and affords different recreational experiences. Or, another example is the new classification

system employed by the MN Department of Natural Resources. They employ a “differentiated approach” to their parks and trails system, classifying each park and trail as one of three types: destination, core, and rustic. Application of a classification system across the regional parks system would appeal to a broad base and the varied, often conflicting uses, given different geographies would be explicitly managed for different recreational uses.

There are other policy realms that are disconcerting. Specifically, the equity-related policies appear to have been watered down from the 2015 version. The reason they were needed in the first place has been highlighted above. The relevance and existence of the regional parks system is at stake, particularly as the region becomes more diverse. **Recreation Activities and Facilities-Strategy 3: Equitable use** policy language was changed from “strengthen equitable use...” to “promote equitable use...” Thrive MSP 2040 uses strengthen. It should be reverted back to original language. Further, the language in that section should align with language changes made to **Finance-Strategy 4: Equity Considerations**. Related to **Finance-Strategy 4**, I would highly recommend adhering to the amendments proposed by Council Member Cunningham. I would also strongly encourage you to strengthen the language. For instance, the 2015 draft plan specifies how the Council will determine the amount of funds made available in the Equity Grant Program. The 2015 plan states “the amount available for the grant program would vary annually. The amount available is primarily determined by four factors: 1) the Council’s \$40 million limit on outstanding park bond debt at any given time (Minn. Stat. 473.325), 2) the Council’s policy to limit park bond levying to \$7 million annually, 3) the amount required to fulfill Council’s obligated match to state funds, as it pertains to other Regional Parks System grant programs, and 4) Council approval to levy bonds” (p. 101). That section was omitted in the 2018 draft plan and there are no funding commitments or details. When the grant program commitment was made in 2015, implementing agencies and the public were made to believe that this fund would be comprised of several millions of dollars annually based upon the language above. Based on the new draft, without any explicit direction put forward, the Council could easily opt to just fund \$1.00 once and then cancel the entire program. While this is likely not the case, the Council’s approved and published 2018 capital budget had less than \$300,000 earmarked for the grant program for 2018 and 2019. This is in stark contrast to the amount it would have been had the criteria quoted above been adhered to. But, what is playing out here is that funds that could go toward the regional parks system are being spent on other Council priorities, which in effect will adversely impact the Council’s partnership with regional parks implementing agencies. Mind you, some of these agencies are on the public record for wanting to abolish the Council’s role in the regional parks system. As such, I would encourage the Council to add back language that specifies how to determine the amount for the grant program and the commitment to fund it annually.

An additional concern related to **Finance Strategy 4** has to do with the equity toolkit and the prioritization. There has been critique expressed by Council and MPOSC advisory members of the use of the equity toolkit in the funding processes. I would caution you from evaluating the success of the toolkit without explicitly investigating whether it was implemented in the way the Council directed it to be. When the toolkit was adopted by the Council, a very clear path for implementation and execution were provided. Your own meeting minutes will provide evidence that the toolkit was not executed in the

manner you initially directed (see business item powerpoint for exact recommendations). Therefore, one cannot assess its merits without factoring in that it was implemented in a way that goes against the Council's own action. I would encourage you to direct staff to implement the toolkit in the way that it was intended.

Plan summary documents note equity toolkit content has been added to the master planning process. Arguments have been made that it makes more sense there rather than at the funding side of process. Please note, if the equity toolkit was implemented in the way that it was designed to be, as noted in the 2016 CDC meeting, this wouldn't be an issue. I'd also like to note that if you go to the section focused on **master planning requirements** (pp. 73-77), there is no note of the equity toolkit to guide master planning for regional parks and trails. The only language that resembles elements from the toolkit is language related to the Council providing population distributions of park agency jurisdictions, which will "help identify those communities who may be underserved by the Regional Parks System" (p. 75). Building an understanding of who is underserved is wholly insufficient as a mechanism to rectify existing disparities.

Another concern related to **Finance Strategy 4** is the possibility of omitting language about funding prioritization. If you omit that language, what you will ultimately be doing is removing the Council's role in the review and oversight of your own dollars. Yes, your own money. Bonding dollars, the grant program the prioritization applies, is comprised of \$2 of Council bonds for every \$3 of state bonds. So, if the Council receives \$10 million in state bonds, the Council adds \$6.67 million of their own bonds to the parks bonding program fund pot. The prioritization allows the Council the flexibility to have their say in how their own funds are spent. Without the prioritization, there is no mechanism in place for regional say in how those funds are spent. In fact, the prioritization process spelled out is the only mechanism in place for Council review of how those funds are spent before they are allocated to specific projects. If you omit the prioritization policy, you will be left with only local and state review for how regional dollars are spent. How can you justify levying regional tax dollars for projects that are not subject to your own review?

Council and advisory members have noted the reason to omit the prioritization is because implementing agencies will lobby the state to have them direct the Council to fund projects approved by locally elected boards. If that is the true threat, the solution isn't to omit the prioritization clause in the policy plan, the solution is to look at omitting the regional bonding dollar match (\$2 of Council bonds for every \$3 of state bonds) in the policy plan. The state does not direct the Council to match state bond dollars with Council dollars—it's Council policy. The Council has discretion for how it spends park bonding dollars and can do so in a manner that is aligned to Council priorities. So, in essence, Council park bonds could constitute a separate grant program used to fund Council priorities. Of course, implementing agencies will not like that option--which is the point. The Council has leverage there. Use it. If implementing agencies threaten to lobby at the state for local control of bonding dollars, put them on notice that in the event that occurs, regional dollars will be placed in a separate grant program so that regional oversight of regional dollars is assured. After all, local or state elected officials are not obligated to act in the best interest of the region. They are to act in the best interests of their constituents. And

with no one acting in the best interest of the region, what justification is there to have a regional system?

Related to finance, the draft plan removed a significant portion of finance policy content and asserts that those things are addressed in a Program Guide. Yet, the Program Guide has not been made available to the public. What assurances does the public have that changes have not been made to significant portions of what used to be a part of the policy plan? Further, the policy plan does not articulate a process for how changes in the program guide will be made. How will the Council be accountable to the public for a document that has never been shared and that has no controls in place for revisions? What assurances do you have as a body that staff won't make changes willy-nilly to suit their own whim? At the very least, provide guidance in the policy plan of the public review process the document must undergo for both approval and revisions.

The other concern that needs to be raised before I close is the process in which the policy plan was drafted. Again, getting back to your statutory role, to provide for regional outdoor recreational space for the public, do you recall staff sharing the voices of the public during the drafting process? Did you hear what the public wanted in terms of outdoor recreational opportunities? What they wished for? Did staff share with you what the data collected from nearly 5500 regional park and trail visitors in 2016 tell us with regard to the policy considerations that were before you? How about input from 2018 received from the voices that informed the policy plan in 2015? As you undertook conversations to eradicate language that hundreds of people helped shape in 2015, or spent months at the table in 2016 to create, were you made aware of their input? Why did you only hear from a few voices at the public hearing? Before then, were you made aware of inherent policy tensions between varied constituencies? How about the differences between the views of the public and those of regional park implementing agencies? No? One must ask why not. What was the political motive to silence the voices of the public during this process? Why did staff cherry-pick information provided to policy-makers? To whom did it serve?

I ask that you consider these comments in full. Please do not erode the long-term viability of the regional parks system through enacting bad regional policy.

Sincerely,

Rainry Salk, PhD

From: Jane Schuler <janeschuler@icloud.com>
Sent: Wednesday, September 26, 2018 9:19 PM
To: PublicInfo
Cc: Kramer, Richard
Subject: Regional Parks Policy Plan update

Dear Chair Tchourumoff and members of the Metropolitan Council,

We are concerned about the unbalanced spending of Legacy parks and trails monies in regional parks. The updated plan removes original RPPP language that supports and protects the natural resources which are the very basis of these parks. I attended the celebration of spending of Legacy parks and trails monies at Silverwood Regional Park in January. There were photos around the room showcasing completed projects. Almost every single one was of a building or an asphalt trail. One was of a parking lot. My first thought was "someone got the wrong definition of park!" I did not see one photo of a kestrel nesting box, or of buckthorn removal. More built amenities leads to more spending for increased maintenance.

Regional parks are some of the last tracts of large open space representing ecosystems of wetlands, prairie, savanna, and woodlands. These provide habitat for a great variety of wildlife, are important for climate resilience, and provide recreation for humans. We think parks should be used only for low-impact activities. We visit Phalen Regional Park frequently, for swimming, walking, and bird-watching. We would like to see more mown lawn space turned into pollinator and bird friendly native plantings. This would also reduce emissions and noise from lawn mowers. We support using bonding dollars for natural resource restoration. In the face of unknown consequences of climate change, we must protect our natural environment. Thank you for consideration of these comments.

Sincerely, Jane and Janice Schuler
janeschuler@icloud.com
St. Paul, MN

From: Anne Shadrick <anne.shadrick@gmail.com>
Sent: Tuesday, September 11, 2018 12:14 PM
To: PublicInfo
Cc: Commers, Jon
Subject: Regional Parks Policy Plan Update

Hello,

Please keep Dakota County Parks nature friendly. Lebanon Hills, Whitetail Woods and other parks are rare gems in the Twin Cities and need to be kept as such.

I do not support the draft plan which increases built infrastructure throughout our Regional Parks System, and lacks accountability to natural resource restoration and management. I urge you to send the draft plan back for revisions.

To maintain the integrity and achieve the potential of this nature-based parks system for now and future generations, I would support revisions that:

- strengthen accountability for restoring and managing the high quality natural resource base of the regional parks system
- attract users and foster a legacy of stewardship through outreach, programming and low-impact natural-resource based recreation suitable for all users
- eliminate language for expansion of undefined recreation amenities
- eliminate any potential for transportation planning within regional park boundaries

Thank you for your consideration and support of our unique, and potentially world-class, nature-based park system.

Sincerely,
Anne Shadrick
17211 Eastwood Ave
Farmington

Sent from my iPad

From: Leah Shepard <leahshepard@gmail.com>
Sent: Thursday, September 27, 2018 12:29 PM
To: PublicInfo <public.info@metc.state.mn.us>
Cc: Mullin, Emmett <Emmett.Mullin@metc.state.mn.us>
Subject: Regional Parks Policy Plan Comments

Dear Metropolitan Councilmembers, Staff, and Decision Makers:

Intentional focus on Racial Equity in park use the right course. This is not only due to the morals and values of our area, and the achievement of the purpose of the Regional Park System. Importantly, Racial Equity in our parks is crucial to the future continuation and protection of our parks and public lands. The long-range success and health of our park system relies on a strong, diverse base of persons who recognize the value of, and are deeply committed to, the natural world and outdoor recreation. This is not possible if large portions of our population are not exposed to the natural world through our parks. Parks play a crucial role in connecting people to the outdoors and our natural world. Indeed in some instances parks may be the only connection. For decades people of color have been intentionally excluded from public park systems. This can not be undone passively, but requires intentional and measurable steps to ensure these public services are truly public. The comprehensive and accountable use of the Racial Equity Toolkit is the beginning of that intentionality. Please maintain the language in the Regional Parks Policy Plan regarding the reprioritization of projects via the Racial Equity Toolkit. Please support the implementing agencies with training and assistance with using the Toolkit. Please ensure the agencies are aware they are expected to prioritize their projects based on the Toolkit before they arrive at the Met Council. Please hold the implementing agencies and yourselves accountable to the toolkit and the Council's own goals and mission. Please do this for the future of our parks and public lands.

Sincerely,
Leah Shepard
Saint Paul Resident
247 Morton St East Saint Paul, MN 55107
Chair of the Ramsey County Parks and Recreation Commission
(This letter is sent personally, and not associated with the RCPRC)

From: Witt <witt.siasoco@gmail.com>
Sent: Thursday, September 27, 2018 4:37 PM
To: PublicInfo
Subject: Regional Park Policy Plan

Hello. I am a 20 year resident of Hennepin County - I live at 2414 Buchanan St NE, Minneapolis.

As a parent of two young (ages 12 & 7) children who skateboard, I feel it is important for the Met Council to provide quality via land allocation and funding for skateparks.

Skateboarding provides a low cost physical activity for children that don't have the financial means to play traditional team sports. It is unmediated, builds self determination, and fosters creativity.

I hope the Met Council will provide spaces in the future for skateparks in the proposed Regional Parks Plan. Thank you for your time.

Witt Siasoco
art + design
612.207.3312
Witt Siasoco.com

From: Carmela Simione <carmelasimione@gmail.com>
Sent: Thursday, September 27, 2018 4:18 PM
To: PublicInfo
Subject: FUND SKATEPARKS

Good afternoon,

My name is Carmela Simione and I am writing to support skatepark funding. Skate parks have been shown to drastically reduce crime in areas and promote health, wellness, and community. Please fund skateparks in regional parks!

Sincerely,

Carmela Simione

From: Tyler Stotz <tylerstotz@gmail.com>
Sent: Thursday, September 27, 2018 3:49 PM
To: PublicInfo
Subject: Skateparks

Fund the regional parks skateparks

From: Jeff Strate <jstrate@earthlink.net>
Sent: Wednesday, September 26, 2018 2:13 PM
To: PublicInfo
Cc: Munt, Jennifer
Subject: Comment: 2018 Regional Parks Policy Plan Update

From: Jeff Strate
15021 Summerhill Drive
Eden Prairie, MN 55346
952-949-8980

To: The Metropolitan Council
Saint Paul, Minnesota

Dear Met Council,

I have reviewed sections of the *2040 Draft Regional Parks Policy Plan Update* that the Metropolitan Council will soon consider. As an active citizen advocate for 1) public transit, 2) open spaces, 3) hike and/or bike trails, 4) park usage equity disparity issues, and 5) a sustainable metropolitan region. Thank you for considering my objections and sending this draft back to the planners.

This draft of the plan would enable expanded development in the park system that would arguably marginalize and degrade the system's natural green infrastructure. This draft would also enable the overlap of planning for the management and enjoyment of natural areas with transportation planning. Any co-mingling of regional parks dollars with road and transportation dollars will trend toward the blighting of our superb regional parks systems by a spreading web of biking corridors and park roads.

Asphalt and murrum paved commuter bicycling trails should only skirt the parks or cross small portions of the parks. Paved regional trails are fine, but our regional park systems are for protecting and restoring the few remaining patches in our region of Mother Nature's restorative green quilt for humans, native plants and wildlife.

The 2040 Draft Plan must guide future park system stewards (our successors) to protect and manage the natural resource base of each regional park system.

Future drafts of the 2040 plan should strike references to 1) any undefined recreational amenities that might be dreamed up, and 2) any transportation planning for commuters within regional park boundaries. Future pressure to shoehorn into natural areas the latest, trending recreational whims of those addicted to smart phones should NOT be provided an easy portal to further spoil what took hundreds of thousands of years to create.

Future drafts of the 2040 plan should strongly commit to the protection of of the few remaining, sustainable patches of Mother Nature's quilt remaining in our region. The 2040 plan needs to provide more direction for low-impact, nature-based opportunities that are engaging, affordable and accessible to all. I strongly applaud Three Rivers Park District's ongoing program that engages students from inner ring suburbs.

Vote no to the current plan update. And then tell the planners to make it work.

With warmest regards,

Jeff Strate

Author
"Guide to the Southwest LRT Regional Trail"
Articles for regional magazines and community newspapers on open space and suburban design.

TV Producer

Democratic Visions and contract projects.

Former positions

Member Southwest LRT Community Advisory Committee (1 term)

Board Member, Minnesota Land Trust (2 terms)

Participant in community charrett for SWLRT Town Center Station, Eden Prairie

President, Friends of Birch Island Woods (1999 to 2010)

Community organizer and citizen media producer in support of 3 City of Eden Prairie parks referendums 1994 - present

Member of several park management planning task forces, City of Eden Prairie

Founder, Bukumi Wildlife Club and Zoo, St. Edward's School, Kakumiro, Uganda

From: Marilyn Torkelson <marilyntorkelson@gmail.com>
Sent: Wednesday, September 5, 2018 4:04 PM
To: Tchourumoff, Alene <Alene.Tchourumoff@metc.state.mn.us>
Subject: Re: The Regional Parks Policy Plan

Dear Chair Tchourumoff and members of the Metropolitan Council,

As you know the Twin Cities metro area's regional parks are some of last tracts of large open space representing ecosystems of Prairie, Savanna, Wetlands and Woodlands. The parks provide habitat for a great variety of Wildlife and represent "Gateways to Nature" recreation for humans.

I am a member of Wild Ones, a national non-profit that promotes environmentally sound landscaping practices to preserve biodiversity through the conservation, restoration and establishment of native plant communities. I strongly believe that it is imperative that we preserve natural spaces for immediate benefits such as mental and physical well being of people, as well as, long term climate resiliency, in addition to the benefits for native plants, wildlife and water quality. Asphalt paths belong at the periphery of parks to allow safe passage of wildlife throughout the parks. It is hazardous to both people and wildlife to promote high speed biking in the midst of wildlife areas. I personally ran into an animal (possibly a muskrat?) that darted across a paved bike path in an attempt to head for the safety of water. This caused me to lose control of my bike. I love visiting regional parks to enjoy the beauty of the flora and fauna. Playing fields and high speed bikers do not mix well with birders and others trying to soak in the serenity of the natural world.

We have the following comments regarding the updates to the Regional Parks Policy plan (RPPP).

1. A strike-out version of the draft plan was not provided to the public diminishing transparency and access for citizens to see what was changed in the update.
2. The updated plan removes a great deal of the original RPPP language that supports and protects the natural resources which are the very basis for these parks. For example:
 - i. ~~"In addition to providing passive recreation opportunities, the park reserves also preserve, maintain and connect high quality or regionally important natural resources", p14.~~
 - ii. ~~"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, p19.~~
 - iii. ~~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, p162.~~
3. We advise **strengthening accountability of natural resource management**, e.g.
 - a. For projects using Legacy monies, a natural resource restoration goal, such as return of a faunal element, like the Bobolink or Scarlet Tanager is stated and strived for.
 - b. Following approval of master plans, natural resource conservation, protection and restoration implementation reports are provided at least every three years. (*Chapter 5*)
 - c. Projects submitted for funding must include
 - i. an review by ecology consultant to meet criteria of minimal impacts and,
 - ii. a summary of how the project will benefit the integrity of the parks system. (*Chapter 5*)

d. For regional parks, revise criteria to “Accommodates a variety of **low-impact** outdoor recreation activities” (*Chapter 4, Table 4.1*)

i. Permitted low impact activities align with the Regional Park Criteria list: minimal impact boating, e.g. kayaking, canoeing, biking to the park but not through the park on commuter trails, cross-country skiing, Nature appreciation, tent camping, picnicking, and snowshoeing.

4. We advise **strengthening the integrity of Nature based recreation and education opportunities:**

a. Secondary or support activities are currently undefined. Adding amenities to a natural setting does not make an activity “nature-based”. As such, this language needs to be removed from, or must be clearly defined in, the Policy Plan prior to its adoption to prevent potential duplication of amenities such as those in city parks and to minimize conflicts with natural resource opportunities. (*Chapter 7, page 92*)

b. Regional trails serving a transportation function should be provided around the outside of regional park/park reserve boundaries; trails within park boundaries should only provide a recreation function (*Chapter 7, Strategy 4*).

5. We support **Leaving A Legacy of Nature** with:

a. The use of bonding dollars for natural resource restoration (Ch. 8, p. 103, lines 16-19)

b. Opposing use of Legacy Parks and Trails funds for any new construction projects and, funding for renovation or expansion projects must meet highest level of sustainable practice as defined by LEED certification or other comparable system. (Ch. 8, Strategy 3)

c. Assure goals of Parks and Trails Legacy Plan are met for taking care of what we have, including natural resource stewardship, and engaging the next generation of stewards.

d. Increase equitable use of the Regional Parks System by investing in outreach and building awareness of the role Nature-based Regional Parks have in the overall system.

Thank you for the opportunity to comment and we appreciate your support of our suggestions to maintain the regional parks as high quality, natural resource based “Gateways to Nature”.

Very truly yours,

--

Marilynn Torkelson

“If suburbia were landscaped with meadows, prairies, thickets, or forests...then the water would sparkle, fish would be good to eat again, birds would sing and human spirits would soar.” -Lorrie Otto

From: Marilyn Torkelson <marilyntorkelson@gmail.com>
Sent: Wednesday, September 19, 2018 6:00 PM
To: PublicInfo; Munt, Jennifer
Subject: The Regional Parks Policy Plan

As you know the Twin Cities metro area's regional parks are some of last tracts of large open space representing ecosystems of Prairie, Savanna, Wetlands and Woodlands. The parks provide habitat for a great variety of Wildlife and represent "Gateways to Nature" recreation for humans.

My husband and I live in Eden Prairie. We love to hike, kayak, canoe, swim, watch birds, cross country ski and snowshoe in our regional parks. While there, We are most thrilled by the wildlife we see and hear especially birds. I am also passionate about native plants and am discouraged by the spread of garlic mustard and buckthorn along with other invasive plants. Although I also love to bike, I do not approve of paved high speed bike paths in the interior of regional parks. I see too many dead creatures that have been killed trying to cross a paved bike path to believe they are friendly to the wildlife we are trying to preserve.

We have the following comments regarding the updates to the Regional Parks Policy plan (RPPP).

1. A strike-out version of the draft plan was not provided to the public diminishing transparency and access for citizens to see what was changed in the update.
2. The updated plan removes a great deal of the original RPPP language that supports and protects the natural resources which are the very basis for these parks. For example:
 - i. ~~"In addition to providing passive recreation opportunities, the park reserves also preserve, maintain and connect high quality or regionally important natural resources", p14.~~
 - ii. ~~"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, p19.~~
 - iii. ~~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, p162.~~
3. We advise **strengthening accountability of natural resource management**, e.g.
 - a. For projects using Legacy monies, a natural resource restoration goal, such as return of a faunal element, like the Bobolink or Scarlet Tanager is stated and strived for.
 - b. Following approval of master plans, natural resource conservation, protection and restoration implementation reports are provided at least every three years. (*Chapter 5*)
 - c. Projects submitted for funding must include
 - i. an review by ecology consultant to meet criteria of minimal impacts and,
 - ii. a summary of how the project will benefit the integrity of the parks system. (*Chapter 5*)
 - d. For regional parks, revise criteria to "Accommodates a variety of **low-impact** outdoor recreation activities" (*Chapter 4, Table 4.1*)
- i. Permitted low impact activities align with the Regional Park Criteria list: minimal impact boating, e.g. kayaking, canoeing, biking to the park but not through the park on commuter trails, cross-country skiing, Nature appreciation, tent camping, picnicking, and snowshoeing.
4. We advise **strengthening the integrity of Nature based recreation and education opportunities**:
 - a. Secondary or support activities are currently undefined. Adding amenities to a natural setting does not make an activity "nature-based". As such, this language needs to be removed from, or must be clearly defined in, the Policy Plan prior to its adoption to prevent potential duplication of amenities such as those in city parks and to minimize conflicts with natural resource opportunities. (*Chapter 7, page 92*)

b. Regional trails serving a transportation function should be provided around the outside of regional park/park reserve boundaries; trails within park boundaries should only provide a recreation function (*Chapter 7, Strategy 4*).

5. We support **Leaving A Legacy of Nature** with:

a. The use of bonding dollars for natural resource restoration (Ch. 8, p. 103, lines 16-19)

b. Opposing use of Legacy Parks and Trails funds for any new construction projects and, funding for renovation or expansion projects must meet highest level of sustainable practice as defined by LEED certification or other comparable system. (Ch. 8, Strategy 3)

c. Assure goals of Parks and Trails Legacy Plan are met for taking care of what we have, including natural resource stewardship, and engaging the next generation of stewards.

d. Increase equitable use of the Regional Parks System by investing in outreach and building awareness of the role Nature-based Regional Parks have in the overall system.

Thank you for the opportunity to comment and we appreciate your support of our suggestions to maintain the regional parks as high quality, natural resource based "Gateways to Nature".

--

Marilynn Torkelson

"If suburbia were landscaped with meadows, prairies, thickets, or forests...then the water would sparkle, fish would be good to eat again, birds would sing and human spirits would soar." -Lorrie Otto

From: Michael Torres <torresmj18@gmail.com>
Sent: Thursday, September 27, 2018 8:21 AM
To: PublicInfo
Subject: Mountain biking in our regional parks

Dear Met Council,

2040 Regional Park Plan update is a perfect time to consider more mountain biking opportunities, bike skills parks and off-road trails to augment current regional parks and help with their interconnectedness.

From: Torres, Michael <michael.torres@woodplc.com>
Sent: Thursday, September 27, 2018 8:16 AM
To: PublicInfo
Subject: Mountain biking in our regional parks

Dear Met Council,

2040 Regional Park Plan update is a perfect time to align with the city of Minneapolis 2040 vision of reducing cars by encouraging biking. The met council should consider more bike facilities, bike skills parks and off-road trails to augment current regional parks and help with their interconnectedness.

Michael Torres, CPG,
Senior Geologist
Environment & Infrastructure Solutions
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Edina, MN 55439 USA
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From: Lorenzo Tunesi <lorenzo.tunesi@gmail.com>

Sent: Monday, July 30, 2018 9:39 AM

To: PublicInfo <public.info@metc.state.mn.us>

Subject: Draft 2040 Regional Parks Policy Plan

To whom this may concern,

I would like to commend all who have worked on this plan as well as the Plan Update. It is thanks to your work that we currently, and our descendants will later, enjoy such wonderful amenities. Thanks to your forward looking vision we rest assured that generations to come will be able to get away from the day-to-day urban life and take advantage of green space.

It takes courage and hard work.

Thank you!

Lorenzo Tunesi

4413 Ellsworth Dr

Edina, MN 55435

From: heidiup1@aol.com
Sent: Monday, September 17, 2018 5:32 AM
To: PublicInfo
Subject: regional parks policy plan

Hi folks,
I vote for less asphalt and more nature. We should be restoring natural resources and programming, not installing more asphalt!
Thanks,
Heidi Uppgaard
Minneapolis, MN 55417

From: Reese Vasquez <reesevasquez17@gmail.com>
Sent: Thursday, September 27, 2018 5:00 PM
To: PublicInfo
Cc: Munt, Jennifer; Commers, Jon
Subject: Regional Parks Policy Plan

Dear Metropolitan Council Members:

I appreciate the opportunity to comment on the draft 2040 Regional Parks Policy Plan update. I live in Hennepin County. I work in a low-income housing project in Ramsey County. Many of the residents I work for are immigrant and/or persons of color with small children. These families are of modest means and cannot afford nice bicycles, but I believe that the parents want their children to have access to healthy activities like most parents do.

I participated in the community meetings that resulted in a regional parks ambassador program. I had high hopes that low-income people and communities of color would benefit from a staff position to strengthen equitable use of our regional parks system. I see that the statement on equitable use has been weakened. Simply "promoting" equitable use will have a different impact than strengthening equitable use.

Simply promoting these parks will not lead to making equitable use a priority. The regional parks system needs to create amenities that will draw young families of color.

I see in Chapter Three of the draft plan that there is a proposed expansion of the regional trails system. Did your research indicate that young families of color want more trails?

How can the planners of this system dedicate land and pavement to regional trails, while excluding any considerations to splash pads and fields for pick-up games?

Local parks should not be the sole public space that features these sorts of amenities. As it stands, several fields at the local parks are reserved by teams and are unavailable to kids who are not involved in organized sports. The state-of-the-art ball fields are kept under lock and key. The regional parks are intended to be a regional destination for all residents--including young families of color.

Sincerely,

Maurice Vasquez

From: Matthew von Ende <matthewvonende@cpcrc.net>
Sent: Thursday, September 27, 2018 1:00 PM
To: PublicInfo
Subject: Skateparks in regional parks

Hi,

I want to voice my support for including skateparks in regional parks. The action sports community is an underrepresented population and I feel Met Council needs to ensure skateparks are included.

Thanks,

Matthew von Ende
General Manager,
Urban Ventures Leadership Foundation
Cristo Rey Jesuit High School
Office: 612.545.9808
Fax: 612.823.4141
www.cristoreytc.org
www.urbanventures.org

From: J. Winkelman <winkelman.jenny@gmail.com>

Sent: Thursday, August 16, 2018 10:33 AM

To: PublicInfo <public.info@metc.state.mn.us>

Subject: public comment

Hello.

Please accept these comments and incorporate them into your regional parks planning documents.

1. All regional parks be mandated to offer recycling AND supportive services so that recycled materials are correctly diverted. St Paul does NOT do this.
2. Create or require all regional parks to either have their own or contract with a competent ecological maintenance company. Regular parks workers do NOT have the skills or knowledge to properly identify plants and maintain natural areas.
3. Require all employees - seasonal and full time - to become state certified (it is free) through the MN Pollution Control agency in
Smart Salting for sidewalks and parking lots and/or road
maintenance <https://www.pca.state.mn.us/water/smart-salting-training>
Summer Maintenance training <https://www.pca.state.mn.us/water/summer-turf-grass-maintenance-training>

Thank you,
Jenny

Jenny Winkelman
(651) 315-4243
winkelman.jenny@gmail.com

"Conservation is hugely complex... Invertebrates [such as the Monarch Butterfly] don't need just habitat...they need habitat connected across the landscape to allow for adaptation to climate change, and that is sufficiently resilient to provide sanctuary from pesticides and disease."-Scott Hoffman Black, Xerces Society

From: Roberta Wirth Feeney <robertawirth.feeney0@gmail.com>
Sent: Monday, September 17, 2018 4:23 PM
To: PublicInfo
Subject: Regional Parks Policy Plan Update

I support the use of low impact interactions in Lebanon Hills and other nature parks in the metro area. I am a biologist who has, in my capacity as a MPCA 32 year employee, promoted Low Impact Development as a stormwater model to preserve what little untouched nature is still left without the infrastructures and impervious pavement found in typical developments. One of the highlights of my well traveled life was hiking through Isle Royal when I was a 16 year old taking a White Bear Lk school summer biology program. Walking through the woods, on a dirt path and swimming in inlet lakes for a week (and observing moose, fox and chipmonks at our camp sites) sure beats my travels to Europe and National Parks with careful asphalt paths and picnic tables.

It would be a better experience for young and old alike to walk on dirt paths near butterfly and prairie restorations. Gravel parking lots were replaced at Lebanon Hills with asphalt recently , which is just the opposite of what should have been done. We can do better.

These comments reflect my own thinking and not that of my work place.

Sincerely,

Roberta Wirth-Feeney

From: JJ Wollak <JjWollak@schawk.com>
Sent: Thursday, September 27, 2018 12:51 PM
To: PublicInfo
Subject: 2018 REGIONAL PARKS POLICY PLAN UPDATE

I understand that folks are trying to get skateparks built at Lake Bde Maka Ska and Lake Nokomis, and that there has been some pushback by people contacting the met council, advising against skate parks in regional parks.

As a lifelong resident of S Mpls, I want you to know that I want to see skateboarding in regional parks.

Best regards,
J.J.

=====

J.J. WOLLAK
ACCOUNT MANAGER

SCHAWK
T (612) 782-6254 DIRECT
T (612) 789-8514 MAIN
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Jan Youngquist
2930 Boone Avenue South
St. Louis Park, MN 55426

September 26, 2018

Metropolitan Council
390 Robert Street N
Saint Paul, MN 55101

RE: 2040 Regional Parks Policy Plan Update

Dear Metropolitan Council Members, Metropolitan Parks and Open Space Commissioners, and Staff:

Thank you for the opportunity to review and comment on the draft *2040 Regional Parks Policy Plan* update. As the principal planner for the Regional Parks System at the Metropolitan Council for nearly 12 years, I served the region by not only implementing the *2030* and *2040 Regional Parks Policy Plans*, but also by updating the *2030 Regional Parks Policy Plan* in 2010, amending the *2030 Regional Parks Policy Plan* in 2013, co-leading the development of the *2040 Regional Parks Policy Plan* in 2014, and initiating the update of the *2040 Regional Parks Policy Plan (2040 RPPP Update)* in 2017, which included developing the project plan and scope of the *2040 RPPP Update*.

I have significant concerns regarding inconsistencies and the lack of transparency in the *2040 RPPP Update*.

Inconsistencies—The draft *2040 RPPP Update* includes inconsistencies with *Thrive MSP 2040 (Thrive)*, with the Council-adopted *2040 Regional Parks Policy Plan*, and with itself.

Inconsistencies with *Thrive MSP 2040*: *Thrive* provided specific direction that was incorporated into the development of the *2040 Regional Parks Policy Plan* in 2014, but has been altered and diluted in the draft *2040 RPPP Update*. Page 50 of *Thrive* states that the Council will collaborate with the Metropolitan Parks and Open Space Commission, regional park implementing agencies, and state partners to:

“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.”

- Pages 8 of the draft *2040 RPPP Update* omits the reference to age and national origin of the specific targeted groups. However, according to the Council’s own regional forecasts, one in five residents in the Twin Cities region will be 65 or older in 2040, a growth of 490,000 people in this age cohort from 2010-2040. No other age group will grow as fast as those 65 or older. Additionally, the region will gain 416,000 new residents through international immigration. (MetroStats: “The Twin Cities Regional Forecast to 2040: Steady Growth and Big Changes Ahead”, June 2017)

Removing these targeted groups from policy decisions will not help efforts to strengthen equitable usage of the regional parks system and deliberately overlooks a large portion of the region’s population in 2040.

- Page 15 as well as Recreation Activities and Facilities Strategy 3 (page 94) of the *2040 RPPP Update* more egregiously changes and dilutes the direction provided in *Thrive* by not only omitting age and national origin, but changes “strengthen equitable usage” to “promote equitable usage”. Page 15 reads:

“Promote equitable usage of regional parks and trails by all our region’s residents across race, ethnicity, income, and ability, inspiring a legacy of stewardship that strengthens friendships, families, health, and spirit.” (emphasis added)

The Council-adopted *Thrive* language to “Strengthen equitable usage” provides a basis for measurement toward a specific goal. The Council-adopted *2040 Regional Parks Policy Plan* used visitation data from the 2008 Regional Parks and Trail Survey as a baseline, included specific policies and strategies aimed at strengthening equitable use, and provided direction to use future regional parks system survey data to measure how well the policies and strategies meet the goal. This is in accordance with *Thrive*, which states that Accountability means adopting a data-driven approach to measure progress.

“Promoting equitable usage” and “inspiring a legacy of stewardship that strengthens friendships, families, health, and spirit” is superficial, does not provide a mechanism for determining measurable outcomes toward a policy goal, and is inconsistent with *Thrive*.

- A similar deviation from the direction provided in *Thrive* can be found on page 24, where language from the Council-adopted *2040 Regional Parks Policy Plan* has been changed in the draft *2040 RPPP Update* from the Council seeking to “strengthen equitable usage” to “enhance equitable usage.” While on the surface, this deviation from *Thrive* may seem to just be semantics, it has large policy implications for the Council truly moving the dial in equity outcomes by altering language that is measurable and has teeth, to something that pays lip service, is not measurable, and is subjective.
- The draft *2040 RPPP Update* has several references to “promoting equitable usage” and “enhancing equitable usage”, so in addition to being inconsistent with *Thrive*, it is inconsistent with itself.

Thrive also provided direction for the *2040 Regional Parks Policy Plan* to:

“Promote expanded multimodal access to regional parks, regional trails, and the transit network, where appropriate.”

- This direction is incorrectly stated and altered on page 15 of the draft *2040 RPPP Update*, which reads:

“Expand access to regional parks and trails by connecting them with local, state, and federal parks, trails, other lands, and transportation networks, including transit, bicycle, and pedestrian systems.”

While the proposed language may be a worthwhile goal, it does not belong in a list of directions quoted from *Thrive*. The *Thrive* direction focuses on reducing vehicular trips to regional parks

and trails by partnering with other agencies to provide multi-modal access to the existing regional parks system. The revised language puts the onus on expanding the regional parks system to connect to other networks. It's a 180-degree difference from the direction provided in *Thrive*.

Inconsistencies with the Council-adopted 2040 Regional Parks Policy Plan:

- The System Plan portion of the draft *2040 RPPP Update* proposes two additions to the regional parks system that were not identified in the Council-adopted *2040 Regional Parks Policy Plan*— boundary adjustments to Rice Creek Chain of Lakes Park Reserve and to Rice Creek North Regional Trail. The map of boundary adjustments on page 56 (Figure 3-8) does not correspond with the table of regional park boundary adjustments on page 54 (Figure 3-7) and includes a system addition for the Highway 96 Regional Trail.

Furthermore, these system additions conflict with page 61 of the draft *2040 RPPP Update*, which states that system additions were not considered as part of this update. This same page includes a footnote that system additions “may be added at a later date with consultation from our partners and community stakeholders.” In order to make additions to the regional parks system, the *2040 Regional Parks Policy Plan* would need to be amended through a public hearing process. The footnote is superfluous and may be confusing to the reader.

- The larger issue with these system additions, however, is that MN State Statute 473.856 requires that the Metropolitan Council submit System Statements to affected local government units when amending a metropolitan system plan. Within 9 months, the affected jurisdiction needs to amend its comprehensive plan. Local communities are currently in the process of preparing their decennial comprehensive plans. **It would not be in the Council’s best interest to amend the System Plan at this time and require communities to amend the comprehensive plans they have just spent 3 years preparing.**

- Page 22 of the draft *2040 RPPP Update* briefly references the creation of a grant program using Council bonds to “promote equitable use of regional parks and trails.” This weakens the language that is in the Council-adopted *2040 Regional Parks Policy Plan*, which reads:

“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.” (emphasis added)

This strategy was developed after significant community engagement in 2013-14, where Council staff heard that in order to help achieve the equity outcome, the Council should “put its money where its mouth is”, and in order to get well-designed and innovative proposals, the Council should make the grants competitive rather than distribute them to each regional park implementing agency via a formula, and not bury the grant funds within another grant program.

Lack of Transparency—

I am very concerned about the lack of transparency in elements of the draft *2040 RPPP Update*, including:

- Significant portions of the Council-adopted *2040 Regional Parks Policy Plan* related to regional parks funding practices and produces were removed from the draft *2040 RPPP Update*, with the notation “for additional information about this practice, please see the administrative companion to this plan, the Program Guide.” However, the Program Guide was not released with the draft *2040 RPPP Update* for public review and comment. The Council is the steward of \$20-30 million dollars of public funds for the regional parks system each year. It has a responsibility to be transparent with how those funds will be spent and the associated grant requirements.
- The Laws of Minnesota were changed in 2015 to require the Metropolitan Council to use regional parks system interest earnings “for the use and betterment of all regional recreation open space lands under the jurisdiction of the Metropolitan Council.” This provided a great opportunity for the Council to determine how the funds should be spent as part of this update to the policy plan. Unlike Council bonds, which may only be used for capital projects, there are no strings attached to the interest earnings. In early 2018, Council staff who have since resigned set up community engagement to inform this policy matter. However, the draft *2040 RPPP Update* is silent on how these funds will be spent based on community engagement. This runs counter to *Thrive*, which states that the Council will engage a full cross-section of the community in decision making. Direction may have been provided in the Program Guide, but as noted above, it was not made available for public review and comment. The Council has an obligation to inform the public on how these funds will be spent.
- A significant policy change is buried on page 90, under the text associated with System Protection Strategy 6: Placement of wastewater facilities. The Council has had a long-standing policy to reserve the right to place an easement for a future regional wastewater corridor on lands that were purchased with regional park bonds. The draft *2040 RPPP Update* changes this policy to read:

“If the Council requires an easement for a future regional wastewater infrastructure (sic) as a condition of its park acquisition grant, the Council will fairly compensate the regional park implementing agency.” (Emphasis added)

This significant policy change would result in the Council double-paying for land for its regional systems and is a misuse of scarce public dollars. The existing long standing policy was developed to efficiently use Council funds and is a clear example of the *Thrive* principles of Integration, Collaboration, and Accountability. What is unclear, however, is whether staff from Environmental Services, Finance, and Legal were consulted in this policy change.

Additionally, this language is inconsistent with existing grant agreements between the Council and park implementing agencies, which will create an administrative nightmare for grants staff.

Miscellaneous comments:

- The draft states that there are 389 miles of existing regional trails, which appears to be outdated information. In 2017, there were more than 400 miles of existing regional trails. This number may be even higher in 2018 if additional trail construction has been completed.

- Page 24 states that the System Plan expands the regional trail mileage to more than 1,100 by 2040. This calculation was correct when the Council-adopted *2040 Regional Parks Policy Plan* was developed. However, the trail mileage in the tables throughout Chapter 3 total less than that number. Additionally, the tables are doubling counting some regional trail miles, as there are two regional trail search corridors in Table 3-9 that are part of the Baker-Carver Regional Trail referenced in Table 3-6. This incorrect information may impact the calculation of the estimated acquisition and development costs for the regional parks system in Table 5-3 (which, by the way, comes after Table 8-1 in the document).
- The criteria for regional park and trail master plans on Pages 76 and 78 indicate that “the effective date for these master plan requirements is November 28, 2018, in acknowledgment of regional park implementing agency planning processes that may be underway when the 2040 Regional Parks Policy Plan is adopted.” This does not make sense. The effective date would be the date the Council adopts the updated *2040 RPPP*. If the Council adopts it after November 28, 2018, the Council could not impose these requirements starting on November 28, and that date does nothing to give the regional park implementing agencies any grace period for master plans that are currently underway. The Council adopted the current *2040 Regional Parks Policy Plan* on February 11, 2015 and gave a grace period for the new master plan requirements to take effect July 1, 2015 to acknowledge master planning that was underway when the plan was adopted.
- Siting and Acquisition policies and strategies set the stage for the Council evaluating additions to the regional parks system. The draft *2040 RPPP Update* includes policy language that is very subjective. For example, it states that special recreation features are required to provide “a compelling sense of place” but offers no definition or criteria for what that means or how proposals will be evaluated. Additionally, it states:

”There are other considerations that factor into system additions, including supply of regional recreation opportunities, access to natural amenities, among other things.” (Emphasis added)

This open ended language does not provide park implementing agencies and the public with clear criteria for system additions and opens the door for the Council to arbitrarily and capriciously impose additional criteria not codified in the *2040 Regional Parks Policy Plan*.

I am very proud of the world-class regional parks system we have in the Twin Cities. The Metropolitan Council has a unique and strong role in the success of the system. I hope that you give serious consideration to my comments so the system can continue to thrive in 2040 and beyond.

Respectfully,

Jan Youngquist

Voicemail comments from residents

The Council received seven comments left on voicemail on the 2018 update to the *2040 Regional Parks Policy Plan*.

Commenter	Affiliation	Comment
Blake (no last name provided)	Resident	<ul style="list-style-type: none"> • Support more funding for planning for skateparks around the metro area • Skateparks have better return on investment relative to baseball fields and can be used sunup to sundown, all year round
Clark, Josiah	Resident	<ul style="list-style-type: none"> • Important to more funding for planning for skateparks around the metro area • Benefits to all from a park plan as a skateboarder from skatepark and communities
Fjelstad De Santiago, Nikolai C.	City of Skate	<ul style="list-style-type: none"> • Support more skateparks around the region
Forsline, Paul	City of Skate	<ul style="list-style-type: none"> • Advocate for skateboarding to be added to the RPPP activities list • Skateboarding is an Olympic sport that will only grow • There are three master-planned skateparks (Harriet, Nokomis, Bde Maka Ska) and a desire for a skatepark along the Mississippi • The activity will grow; skateparks can be designed to integrated into the landscape and can be used as water management structures • Allowing and funding skateparks would be a step toward improving equity and new activities in the regional parks system • Would appreciate Met Council support in developing quality skate parks for use in our communities
Lindscott, Will	Resident	<ul style="list-style-type: none"> • Support more funding for planning for skateparks around the metro area
Lorenz, Jesse	Resident	<ul style="list-style-type: none"> • The Council should develop contingency plans for converting municipal golf courses that are no longer profitable to become parks that everyone can use.
No name provided	Resident	<ul style="list-style-type: none"> • Many people would love to have as many skateparks within Minneapolis and Saint Paul as possible • Skateboarding is growing in popularity among kids and adults. • The younger generation should grow up with better and more accessible skateparks



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