



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

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March 29, 2019

Anne Gardner  
City of Saint Paul  
Dept. of Parks & Recreation  
25 W. 4th Street  
Saint Paul, MN 55102

Re: Comments on the Hidden Falls Crosby Farm Regional Park Master Plan

Dear Ms. Gardner,

Thank you for the opportunity to comment on the draft Hidden Falls Crosby Farm Regional Park Master Plan.

Friends of the Mississippi River (FMR) is a local non-profit organization that works to protect, restore and enhance the Mississippi River and its watershed in the Twin Cities metropolitan region. We have more than 2,700 active members, 3,500 volunteers and 2,000 advocates who care deeply about the river's unique resources.

FMR takes an active interest in working with municipalities, counties, state government, and other stakeholders to help shape and influence decisions that impact the health of the river. FMR was founded and continues to play a leadership role in ensuring that the public resources of our National Park —the Mississippi National River and Recreation Area (MNRRA), are preserved for current and future generations to benefit from.

FMR has been working with the city of Saint Paul and other stakeholders for many years to restore and revitalize the Mississippi River Corridor. We have appreciated opportunities to work in partnership with city and parks staff, and we look forward to continuing to have a productive relationship with city staff and leadership moving forward. We have also kept a close eye on development surrounding the park to ensure that the outstanding scenic qualities of the confluence area are preserved for all to enjoy.

In general, we support the draft plan, and we appreciate the work of city staff, partner agencies and the community advisory committee to develop the plan. In particular, we are pleased to see the following things included.

- Strong emphasis on the ecological significance of the park and goals to preserve, restore and enhance the natural resources within the park
- Recognition of the cultural significance of the confluence area to native people as well as the Twin Cities community
- Plans for adding and improving a limited number of park amenities, while maintaining a quiet and mostly undeveloped place
- Plans to expand the park boundary to include riverfront and blufftop land currently owned by Ford Motor Co.
- Plans to improve safety, accessibility and connectedness of paved and unpaved trails within the park
- Plans to reconfigure parking/roadways and reduce pavement at Hidden Falls
- Plans to provide convenient access for paddlers at several locations
- Plans to remove invasive species and conduct ongoing restoration and management of native plant communities and wildlife habitat
- Expansion of wayfinding signage to enhance the visitor experience
- Inclusion of natural resource management plans for both parks in the appendices

We do have a few concerns and recommendations that we'd like to see addressed in the plan, as well as some specific suggestions for changes or corrections to the document. Our comments are detailed below.

**The River Learning Center should be fully integrated into this regional park plan.**

The River Learning Center will be the most significant change that happens within the regional park in the coming years, and it should be a centerpiece of the park master plan. With National Park Service Headquarters located here as proposed, the RLC will serve as an activity hub for the regional park and a gateway to the entire Great River Passage system.

The RLC would provide programming that honors, promotes stewardship of, and teaches the culture, history, and ecology of the river—the same themes that run through all aspects of this plan. It is a natural fit for these elements to exist together in one cohesive plan.

It does not make sense to leave these important details out of the plan. It would be best to avoid a future debate over "it's not in the plan," and it would be unfortunate if the city needed to do a plan amendment process when the RLC comes to fruition. Including the RLC more prominently in the plan will put the city in a much better position to access regional park funding for it in the future.

We suggest adding a seventh element to "Park Priorities" in the Implementation Chapter that focuses on the River Learning Center. At a minimum you could use the language from the Great River Passage website. There is also a fact sheet for the RLC

bonding request that is being used at the State Capitol that would have language and graphics available that could be included in the regional park plan.

**Mountain bike trails should be located in disturbed floodplain areas only (not along bluffs), and they must be separated from natural surface pedestrian trails**

FMR does not support multi-use, shared use or mountain bike natural surface trails along the bluff face on the north side of the park. The area is too steep to construct trails that would accommodate mountain bikes without grading and disturbing the sensitive habitat and erodible soils. Furthermore, these trails provide a quiet contemplative environment that is treasured by many park users. Places like this are rare in an urban setting, and we encourage St. Paul to restrict mid-bluff trail improvements to pedestrian use only.

The best place to put mountain bike trails is in the floodplain. Floodplains are disturbed systems by nature and it makes sense to concentrate disturbance with other disturbance. We suggest locating mountain bike trails within the large undeveloped area in Crosby east of Interstate 35-E.

In the “Trails and Connectivity Improvement” section, 2E and 2J both address the mid-bluff trail, but the descriptions are inconsistent with each other.

We suggest removing the following language from “2E - Natural Surface Trail System” on page 41:

*“As part of this system, a new, linear, mountain biking trail could be added to traverse through Crosby Farm and Hidden Falls at mid-bluff or on ledges above the floodplain, using best practices of the International Mountain Biking Association.”*

Since the preceding sentences describe a process to assess the park for variety of natural surface trail uses, it’s not necessary to speculate that a mountain bike trail could be located in the most sensitive area of the park.

We strongly advise against shared use natural surface trails that allow mountain bikes and pedestrians on the same trail. This creates a major conflict and can be dangerous for both bikers and hikers. We suggest removing the word “preferably” from this clause:

*“...preferably with separate trails for mountain biking and hiking.”*

We also recommend co-locating “2K Pump Track and Bicycle Challenge Course” closer to the bike trails. The current location on Map 2 appears to be isolated and not connected to other bike facilities.

## **Land acquisition opportunities at the top of the bluff should be clarified and mapped**

We strongly support “3B Bluff-top Land Acquisition” on p 46 in the “Hidden Falls North Area Recommendations,” but it needs to be more clearly emphasized in the plan. The City’s Ford Plan includes consideration of adding six acres of public open space at the southwest corner of the site, so it should be in the regional park plan.

We suggest the following changes:

- Add language about this bluff-top opportunity to the discussion of “Boundaries and Acquisition Costs” on page 19
- Delineate the bluff-top parcel as a future park expansion opportunity on Map 2: Boundaries and Acquisitions, pages 16-17
- Show boundary of the full 6-acre bluff-top parcel on Map 3: Hidden Falls North Area Recommendations, page 45
- Make sure the Metropolitan Council includes the bluff-top land opportunity (as well as the Ford river parcel) in their regional park policy for park expansion
- Include reducing and relocating the paved parking lot near the hairpin turn

## **Minimize impacts of adding/improving more bathroom facilities**

We support the idea of expanding hours of operation for the restroom at Crosby West as an interim solution until the River Learning Center is built.

We question the need for adding permanent restrooms to the Hidden Falls boat launch and Elway parking lot. Perhaps a structure could be built to screen the porta-johns from view. It will be less expensive and less impactful to the surrounding floodplain if the construction of permanent buildings is minimized.

## **Additional comments and suggestions**

- Map 1 on pages 14-15 Watergate Marina is on legend, but not marked on map
- Map 2 on pages 16-17 Acquisition boundary (red outline) should be on map legend
- 1I Bluff Erosion Mitigation should be done concurrent with mid-bluff trail updates (p 40)
- 1I (or add 1K) Add shoreline stabilization at the highly eroding bank at the red pine plantation just opposite the toe of Pike Island. (p 40)
- 2K Trail Extension on Ford Property. This is needed to connect the regional parks together, but very careful planning and monitoring is needed for the portion of the trail that would diagonally transect the bluff up to Mississippi River Boulevard (p 44)
- 3G Restore Hidden Falls – change from low to medium priority and include habitat improvements in description (p 47)

- 3H Trail to Hidden Falls – glad this is high priority; ensure native plant communities are planted/enhanced by including habitat improvements in description (p 48)
- 3I & 3K Parking Improvements – reducing pavement in the park would be a dramatic improvement and 3K could be changed from low priority to medium or high. (p 48)
- 3L Construct a Weather Shelter – it seems odd to add a shelter near an existing shelter. This is probably not needed, but perhaps it could be combined with addition of boat storage and/or bathrooms near the boat ramp (p 48)
- Map 5 on p 52 shows the marina in large lettering next to the tiny tag for the River Learning Center. We recommend removing the “Marina” tag on this map. Since the future of the marina is uncertain we don’t believe the plan should include that designation.
- 5F Boardwalk and fishing pier improvements should be high priority. This is one of the main amenities presently in the park and should be maintained and/or replaced sooner rather than later. Fishing often serves a diverse user group – it would be culturally responsive to make this a high priority (p 53)
- 6B Trail to Victoria Park - connections into the neighborhood are high priority; using the tunnel under Shepard Rd creates a safe connection (p 55)
- 6C Shepard Road Entrance Safety – we strongly support improving safe connections across Shepard at Elway and other intersections. Overpasses should also be considered. (p 55)

Thank you again for the opportunity to weigh in on this important planning process. We commend you for your effort and we look forward to continuing our partnership to assist with protecting, restoring and enhancing St. Paul’s outstanding regional riverfront parks.

If you have additional questions or wish to discuss the content of this letter, please don’t hesitate to contact us.

Sincerely,

A handwritten signature in black ink that reads "Whitney L. Clark". The signature is written in a cursive style with a large, looping initial 'W'.

Whitney L. Clark  
Executive Director