



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

101 East Fifth Street
Suite 2000
Saint Paul, MN 55101

651-222-2193
www.fmr.org
info@fmr.org

May 10, 2019

Brooklyn Park City Council
City of Brooklyn Park
5200 85th Ave. N.
Brooklyn Park, MN 55443

Dear Mayor Lunde and City Councilmembers,

Thank you for the opportunity to comment on the draft River 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 local, regional and state government partners and other community stakeholders for many years to restore and revitalize the Mississippi River Corridor. We always appreciate opportunities to work in partnership with local parks staff, and we look forward to having a productive relationship with Brooklyn Park city staff and leadership moving forward.

We appreciate the work of city staff, partner agencies and the Recreation and Parks Commissioners to develop the River Park Master Plan update.

Overall, we really like that the master plan is designed to address Brooklyn Park's goals of serving the broader community and emphasizing universal access to the river environment. We appreciate that most of the planned changes and new amenities are modest and will not overwhelm the riverfront.

Specifically, we are pleased to see the following things included in the plan:

- Continued restoration and management of prairie at north end of the park
- Planned restoration and erosion control along the shoreline
- Proposed AIS washing station
- Nature play nodes – great for engaging a diversity of ages
- Fishing platforms – great for engaging a diversity of backgrounds
- ADA accessible overlook (existing and proposed)
- Permanent Paddle Share pad
- Goal of treating stormwater before it enters the river

We do have a few concerns and recommendations that we'd like to see addressed in the plan. Our comments are detailed below.

Cottonwood Tree Preservation and Regeneration

Perhaps you are already aware that recent studies show that Eastern Cottonwood trees along the Mississippi River are not regenerating. Our region could see significant decline of this majestic species that provides numerous ecosystem services, including the absorption and “treatment” of urban stormwater pollution.

One concern we have with the draft plan is the possibility that several healthy cottonwood trees would need to be removed to complete some of the proposed new park amenities. This is especially true at the southern end of the park, but care should be taken along the shoreline when choosing locations for overlooks and fishing piers.

Although we recognize the importance of wetlands and native prairie in Minnesota, we don't support removing cottonwoods to create water treatment wetlands or to conduct prairie restoration.

We'd like to see the plan include a strategy for ensuring protection of this important and beneficial floodplain species. This strategy should include:

- An inventory of cottonwood trees (mature and saplings) on the site
- A tree preservation plan to ensure cottonwoods are not removed for development of park amenities such as viewing platforms, trails, parking lots or the kayak launch
- A robust planting/regeneration plan to ensure natural decline doesn't eliminate the presence of this important species.
- A summary of the benefits and ecosystem services that cottonwood trees provide
- A discussion of ways to treat stormwater that are compatible with cottonwood trees in a floodplain forest
- A list of understory/herbaceous plants that are appropriate for floodplain restoration

Stormwater Treatment

Water treatment through the southern section of the park is a good idea, but the proposed plan will require significant land alteration/excavation and removal of trees and other vegetation. We'd like to see a feasibility study for this area that lays out the associated costs and benefits of a few alternatives, ranging from a minimalist approach to the current proposal.

For example, excavating an island with a bridge is an interesting concept, but is it needed? This approach would require a lot of site alteration for an island that will only be an island when it is surrounded by intermittent stormwater.

Furthermore, adding impervious surfaces in the southern area will add stormwater runoff to the site that also needs to be managed. Perhaps a smaller parking lot and a single trail or boardwalk through the wetlands would be more appropriate for accomplishing the stormwater management goals.

Shoreline Alteration and Paddler Access

We also have concerns about altering the shoreline to create the excavated bay/cove, as there are ample alternatives for launching canoes and kayaks within the park nearby.

MN public waters are governed by state rules that prohibit alteration of the shoreline for river access if there are reasonable alternatives. Prior to moving ahead with next steps for the master plan, we strongly recommend the city consult with the DNR Region 3 Hydrologist assigned to this area to ascertain if the shoreline alteration is permitted under state law.

[MN § 6115.0200](#) EXCAVATION OF PUBLIC WATERS.

Subpart 1. Goals

It is the goal of the department to limit the excavation of materials from the beds of public waters in order to:

...preserve the natural character of public waters and their shorelands, in order to minimize encroachment, change, or damage to the environment, particularly the ecosystem of the waters;

Subp. 3. Prohibited excavation.

Excavation is prohibited in the following cases:

...where it is intended to gain access to navigable water depths when such access can be reasonably attained by alternative means which would result in less environmental impact;

It might make more sense to have the kayak launch and paddle share pad closer to the existing boat launch since there is plenty of beach in the area to launch from. This would also enable the plan to have less parking/impervious surfaces at southern end of the park. Why make people portage their boat when they can get their car so much closer to the water at the existing parking lot?

Floodplain Issues

Most of River Park is within the floodplain, which limits the type of development that can occur. We would like to see the floodplain issues identified and addressed in the plan. For example, how will new buildings be flood-proofed? This is especially a concern for new bathrooms. A map showing the floodplain and flood fringe zones would be helpful.

Thank you again for the opportunity to comment on the River Park Master Plan. Please feel free to contact us if you have any questions or wish to discuss the content of this letter.

Sincerely,

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

Whitney L. Clark
Executive Director

Cc: Jody Yungers, Recreation & Parks Director, City of Brooklyn Park
Jason Spiegel, DNR Hydrologist, Region 3 Metro North
John Anfinson, Superintendent, Mississippi National River and Recreation Area