



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

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Scott Yonke and Ben Karp  
Ramsey County Parks and Recreation  
Maplewood, MN

Dear Scott and Ben:

Thank you for the opportunity to comment on the Battle Creek Regional Park master plan concepts.

Friends of the Mississippi River (FMR) is a non-profit organization with a mission to engage community members and other stakeholders to protect, restore and enhance the Mississippi River and its watershed in the Twin Cities Region. We represent thousands of people in the metropolitan area who care deeply about the river, including a growing membership of over 2,700 people and more than 3,200 volunteers and 2,000 advocates engaged each year.

We value Battle Creek Regional Park as an important natural and recreational area that serves the diverse communities of St. Paul's East Side, Maplewood and beyond. This park is a special asset in how well it's connected to a dense and walkable neighborhood, the range of amenities and recreation areas inside the park, and its inclusion of waterways, bluffs, and a diversity of wildlife habitats. Balancing the recreational and ecological functions of an urban park is a challenging and important issue, and must be done with care.

We recognize that the concepts currently released for feedback are preliminary, and that a more detailed draft master plan is forthcoming. We look forward to reviewing and commenting on the draft master plan in the future but have some comments we'd like to share now.

### **Online Survey Concerns**

We are concerned about flawed survey methods in the current online concept survey. The Trail System and Pig's Eye sections of the webpage include two different map legends, one of which reverses the markings for proposed versus existing hiking/biking trails. For at least the first six weeks that the survey was open, the Fish Creek section had the same flaw. We are concerned that feedback gathered from this flawed survey design will not be valid because it won't be clear how users are interpreting the maps.

Some of the survey questions are also written in a way that will limit the feedback received. For instance, the only opportunity to comment on the Nature Trail Corridor section of the concept is in response to a question reading, “Are any additional Nature Trail Corridors needed?” This is a leading question that doesn’t offer opportunity to comment on the concept more broadly.

### **Nature Trail Corridor**

As an organization who works with East Side schools and frequently brings youth into parks and natural areas, we appreciate the addition of amenities that are tailored to young learners and connected to neighborhood schools. The concepts don’t provide detail about what the learning stations are, but we encourage them to be scaled appropriately. For instance, not all stations should include expansive seating or other overbuilt amenities. One larger gathering or seating area near each nature trail (which could include existing gathering areas at the schools or within the park) seems adequate.

### **Trail System**

FMR supports the addition of trail segments that connect different parts of the park and provide better, safer connections between the park and surrounding neighborhoods. However, we have concerns about the extent of the proposed trail additions in the concepts, in addition to concerns about the planning process to this point.

We know that there is strong desire for expanded mountain bike trails in Battle Creek. To be clear, FMR doesn’t oppose mountain biking, and we agree that well-constructed mountain bike trails are not any more damaging than well-constructed hiking trails. Mountain bikers are allies in their advocacy for parks and active recreation. We all agree on the value of great park systems that get people outdoors in beautiful, wild places. Our concerns aren’t about the mode of recreation, but rather about any significant expansion of trails in fragile areas. We’ve consistently raised similar concerns about proposed expansions of hiking trails in park areas with high conservation value.

The proposed hiking/biking trails shown in the concepts appear to come from the 2017 study of mountain bike trail expansion opportunities at Battle Creek Park. While a significant undertaking, this study should not be considered sufficient for implementation purposes. It primarily engaged the bike community and the park’s immediate neighbors. The project did not seek to engage other groups of park or trail users including hikers, skiers, bird watchers, or other nature enthusiasts. (In one project survey, the respondents self-identified as 89 percent male and 96 percent white, which is not reflective of the park’s overall user demographics.) While this project yielded valuable information about one user group, the plan shouldn’t be interpreted as having broad community support until further engagement is conducted that considers the balance between Battle Creek’s many uses and all visitors’ improvement priorities.

Glaringly, the 2017 report also lacks any assessment of environmental impacts. All trail expansions need to be carefully assessed beyond simply their recreational desirability. Trails, even soft-surface trails, break up high-quality habitat areas, impede wildlife movement, and can contribute to the spread of invasive species. In general, we recommend that trails be limited to larger loops around the park’s periphery, preserving larger sections of undisturbed habitat. Some of the proposed trails break

up undisturbed areas, dividing habitat into smaller and smaller portions with more “edge” areas along trails that are less amenable to wildlife.

For this reason, the proposed trail expansions in the northeast corner of the park are of particular concern. This area is currently undeveloped, making it one of the few pockets of the park with the potential to be high-quality habitat. It should remain undeveloped.

We appreciate that trail expansions have been limited along the bluffs in the Western Trails Zone, but we are still concerned that any new trails at all are being proposed for bluff areas. The existing trails in this area provide sufficient access and should not be expanded.

Most of the Western Trails Zone is in a Bluff Impact Zone and is a Primary Conservation Area, per St. Paul's Mississippi River Corridor Critical Area Plan. These designations mean that this area is unique and vulnerable. While these designations do not forbid the creation of new natural-surface trails, they do mean that it's critically important to incorporate conservation needs and goals, not just recreational goals, in these areas. As Minnesota faces increasing extreme rainfall and other weather events, bluffs are particularly vulnerable to erosion and damage.

We also question the concept's showing of many new trails as being combined use for both hiking and biking. That seems misleading when the trail plan was created through a project that studied only cycling trails and primarily engaged cyclists. In general, we hear from both hikers and cyclists that they prefer dedicated trails that are designed for specific modes and reduce potential conflicts and safety issues. If trails were suitable for sharing, the existing trail network at Battle Creek would be considered adequate—but the off-road cycling community considers the trail network inadequate precisely because the existing trails are designed to serve other modes. For community engagement to result in usable information, the concept should be revised to clearly show which proposed trails will be for hiking and which will be for biking.

### **Trailheads and Amenities**

Battle Creek is uniquely connected to its surrounding neighborhoods. The park's many entrances and amenities are part of what makes it a special community asset. We support modest improvements to trailhead areas, including acquisition of additional parkland in key places, that make the park more inviting and accessible. We also support improved wayfinding throughout the park as it is frequently confusing to navigate. Any added trails and intersections will make wayfinding even more crucial.

### **Fish Creek Concept**

Fish Creek is a unique area and we support the limited expansion of recreational access in this area, including the addition of a trailhead. However, this area is also in a Bluff Impact Zone and Primary Conservation Area and so trails should be limited to what is necessary for access. For instance, trails are not needed on both sides of the (narrow) creek; one side would be sufficient. And blufftop trails that largely duplicate existing trails and connections, which appears to be the case near the northwest edge of the Fish Creek Bluff Preserve, may not be necessary. This blufftop area currently balances valuable habitat with recreational access; more trails in the same network area, particularly for the same user group, are not needed.

## Pig's Eye Concept

We support the creation of improved access to Pig's Eye Lake alongside basic recreational amenities. The proposed trail additions through wetland areas should be carefully assessed for environmental impacts before this plan progresses further. A boardwalk or soft-surface trail in this area would be preferable to the paved trail shown on the concept map (the map appears to show a proposed paved trail over water).

We urge Ramsey County to take an active role in resolving the lack of park and river access across Highway 61. These long-standing disconnects have contributed to racial and economic inequities in access to the river and its benefits, and must be assertively addressed.

Again, thank you for the opportunity to comment on these park concepts. We look forward to participating in the rest of the planning process. If you'd like to discuss anything, please don't hesitate to contact us.

In partnership,



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