



*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](http://www.fmr.org)  
[info@fmr.org](mailto:info@fmr.org)

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Ben Karp  
Ramsey County Parks and Recreation  
2015 Van Dyke St.  
Maplewood, MN 55109

Dear Mr. Karp:

Thank you for the opportunity to offer updated comments on the Battle Creek Regional Park draft master plan. We appreciate that Friends of the Mississippi River (FMR) has been invited to collaborate throughout the planning process and we are pleased that the plan has continued to evolve.

The draft master plan is a notable improvement over earlier concepts we reviewed, particularly in its balance between recreational and ecological enhancements. All parks are challenged by an immense demand for recreational facilities as well as the urgent climate and environmental crisis. We appreciate Ramsey County's efforts to respond to both of these important needs in the draft plan.

Equity is another significant challenge for parks. Battle Creek is a regional destination for mountain biking and cross-country skiing (sports that tend to draw disproportionately white and wealthy users) while also being a neighborhood park for a more diverse surrounding community. Ramsey County should apply an equity lens as it prioritizes park investments to ensure that all visitors are equally served, not just those participating in two marquee sports.

The fishing program is one example of an activity that can serve a broad audience, and is indicative of the kind of programming the park can focus on. Affordable and culturally relevant skiing and biking programs targeted at neighbors can also help increase access. It might be helpful to study Theodore Wirth Park as an example of a regional park with similar dynamics.

### **Trail system**

We are pleased to see significant improvements in the proposed trail system versus what was in earlier park concepts. The draft master plan represents a much stronger conservation ethic by limiting trail expansions (and even reducing trails in some areas) and more carefully evaluating their impacts.

Trail expansions are important for connecting visitors to important areas of the park and improving recreational functions. But trails can also cause significant ecological harm by increasing erosion in the park's fragile bluff areas, isolating wildlife populations, reducing habitat quality, and facilitating the spread of invasive species.

No trail expansions should be planned or constructed until natural resource inventories and environmental impact reviews are complete. We'd like to see this stated more consistently and clearly throughout the plan, ensuring that all stated timelines are in sync with this commitment.

There are also some inconsistencies between the trail concept and the stewardship plan about where trails may be expanded. For instance, Fish Creek Management Unit 13 is listed as a high-quality, high-priority area, and page 151 of the draft plan states that "recreation of area should not expand beyond what currently exists." Yet the trail concept appears to show expanded trails in this area. Such conflicts should be corrected in the final plan.

Shared-use trails for both hiking and biking, particularly narrow and winding single-track trails, can reduce enjoyment and increase safety risks for all modes. We know that it's common to permit multimodal use of these trails but it shouldn't be encouraged. We also recommend that maps and signage in the park be clear about which trails are shared-use and offer safety tips (such as heightened awareness and reduced speed) for users.

### **Other recreational improvements**

We support the expansion of fishing opportunities in the park. Fishing attracts park users of diverse ages, abilities, cultural backgrounds, and income levels. Few other activities appeal to such a diverse visitor base. Care should be taken to stock only ponds that won't connect to other water bodies in an overflow event, and also to stock species already present in neighboring ponds and water bodies.

We support the plan's commitment to limiting new trailhead facilities to basic amenities rather than expansive buildings. We agree that the park's existing recreation center could be improved or redeveloped to provide more visitor amenities and programming. This is likely preferable to adding large buildings elsewhere in the park, particularly given that some parts of the park have higher-quality habitat and/or are more geologically fragile than the existing recreation center area.

We also support the plan's commitment to limiting artificial lighting in the park. For areas that do require lighting, such as ski trails and parking lots, fixtures should be downward-shielded and compliant with International Dark Sky Association standards. These fixtures support safe passage for migrating birds along the Mississippi River flyway, reduce light pollution, and waste less energy.

### **Boundary adjustments**

We support the expansion of park boundaries as acquisition opportunities arise. In addition to the worthy expansion opportunities discussed in the plan, FMR recommends that the 77-acre county-owned grassland property near Century Ave. and Upper Afton Rd. be added to Battle Creek Regional Park. There is significant public support for adding this parcel to the park.

This parcel is an important wildlife habitat worthy of permanent protection. As the draft master plan notes, “High quality natural communities are rare in Minnesota, and particularly in the Twin Cities Metro Area, and are worth protecting and enhancing because they are rare and difficult, if not impossible, to restore to natural condition.”

This particular property’s ecological value is exceptionally high given the statewide rarity of grassland habitat (fewer than two percent of Minnesota’s grasslands remain from what existed before European colonization) and the documented presence of several bird Species of Greatest Conservation Need on the site. Ramsey County is awaiting a final report from the ecological inventory it contracted for this property.

Grassland birds, such as those using this property, are among the most threatened species in the United States. Some of these bird species are very sensitive to habitat fragmentation, which is one of the reasons behind their staggering population declines.

The county’s grassland property presents a crucial opportunity for habitat preservation. The protection benefit is increased by the property’s adjacency to the park; large habitat areas and wildlife corridors are significantly more beneficial than small, fragmented parcels for sustaining wildlife populations. We urge Ramsey County to expand the Battle Creek Regional Park boundary to include this property already in county ownership. FMR could assist the county with funding and expertise to restore and maintain this or other parcels.

### **Stewardship plan**

We support the Stewardship Plan’s overall broad goals. Additional detail and clarity would help strengthen the subsequent plans and recommendations. For example:

- *“Management should seek to control or eliminate exotic invasive species that are damaging the health of park habitats.”*

As a best practice, we believe the term “non-native” should replace “exotic,” as the latter’s connotations can place too much emphasis on a species’ place of origin. “Exotic” could also simply be removed so that the focus is on invasive species regardless of their origin.

- *“The white-tail deer population should be managed to protect existing plant communities and aid the success of restoration activities.”*

This recommendation should specify that populations should be managed at densities lower than their current levels. Pre-settlement densities are often used as a benchmark for management. The “task” associated with the goal of managing deer populations is also confusing as written. The plan identifies the ideal level as the DNR’s recommendation of “20 deer per square mile of deer habitat.” The task then recommends that “deer populations be controlled to less than 25 per square mile of deer habitat.”

The ecological principle of “fragmentation” as a determinant of ecosystem health is called out as #3 in the “Goals and Principles for Management” section. It is gratifying to see that the extent of

proposed trails was reduced in line with this principle. The county should continue to consider this principle, especially when locating trails in high- and medium- quality habitats.

While the classification of high-, medium-, and low-quality habitat is important for utilizing limited resources, it is also important to note that these units may not always be distinct, and that adjacent low-quality units can influence habitat quality in high-quality units. Therefore, creating buffers of restored habitat around high-quality units, even if it means spending resources on a low-quality habitat, may be more important than restoring a medium-quality unit elsewhere. These decisions should be made on a case-by-case basis.

The Mississippi River Corridor Critical Area (MRCCA) is mentioned frequently in the plan but discussed differently in different management units throughout the stewardship plan. We'd like to see a consistent commitment to following MRCCA recreational development guidelines included in the plan for each management unit within MRCCA, including a commitment to limiting trails and other construction in bluff areas.

Principle #7 – that management is a learning process – is more accurately called “adaptive management.” Managers should adapt to both changing park conditions and results of past and current management actions.

For Management Unit 10, climate adaptation should be stressed as a goal of the forest restoration on the islands being built by the U.S. Army Corps of Engineers (USACE). FMR has consistently stated to USACE and Ramsey County that these constructed islands represent an important opportunity to both plan for climate resiliency and actively study how different floodplain community assemblages fare with current and future climate conditions.

FMR is currently working with the city of Maplewood on management planning and restoration of Unit 19 (the city-owned Carver Reserve). FMR received funding from the Outdoor Heritage Fund to conduct management planning and restoration of the 27-acre preserve. The plan will be complete by spring 2022 and restoration will begin shortly thereafter. The initial phase of restoration—involving woody invasive species removal, forest restoration, and grassland enhancement—will run through 2025. This is just one example of how partner organizations are providing resources to help the county achieve its management goals for the entirety of the Battle Creek complex. It's also an example of where the city and county should better align on plans, timetables, and goals for properties that fall within the larger Battle Creek complex.

### **Partnership opportunities**

FMR would be happy to assist the county in its land restoration goals. FMR partners with many metro-area public park agencies to support land conservation. We conduct natural resource inventories, develop and implement restoration and management plans, and engage community volunteers as park stewards. FMR can also secure private and public funding to support these projects, which could ease the resource constraints discussed in the plan. Please contact us if you'd like to discuss partnership opportunities.

FMR is also happy to participate in further planning for the learning trails, including engaging students in the next phase of the creation process.

Again, thank you for the opportunity to comment on the draft master plan. If you'd like to discuss anything, please don't hesitate to contact us.

In partnership,



Alex Roth, PhD  
Ecologist  
aroth@fmr.org, 651-222-2193 x 33



Colleen O'Connor Toberman  
River Corridor Director  
ctoberman@fmr.org, 651-222-2193 x29