



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

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October 18, 2021

Brett Hussong  
St. Paul Parks and Recreation  
400 City Hall Annex, 25 West Fourth Street  
Saint Paul, MN 55102

Dear Brett:

Thank you for the opportunity to comment on the Point Douglas Regional Trail Master Plan.

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.

The Mississippi River is a natural, cultural, and historic wonder that helps define our metro area. In recognition of this, its 72-mile stretch through the Twin Cities is not only a state-designated Critical Area but also a national park afforded special protective policies.

New development, including recreational facilities, in the riverfront area should increase access to and enjoyment of the Mississippi River while respecting and protecting its natural resources. We believe the Point Douglas Regional Trail Master Plan supports these values. We encourage the city to actively work to bring this plan to reality to provide this vital connection to neighborhoods, parks, employment opportunities, and the Mississippi River.

### **Community engagement and access**

FMR appreciates the project team's engagement with FMR and other stakeholders throughout the planning process. We are pleased to see that the city's engagement process included a focus on engaging a representative and diverse range of community members, and that the city reviewed and revised its engagement tactics throughout the planning process.

We agree that this continued attention to representation and access will be important throughout the trail's development and use. Trail awareness and programming can enhance access. The same is true of physical amenities such as benches, lighting, and rest areas. Signage should include imagery that can provide some information without needing to read English.

### **Major road crossings need significant improvements**

The trail crossings at Lower Afton Road and Bailey Road have been a concern for FMR throughout this planning process. These roads are dangerous and difficult for cyclists and pedestrians to cross, and even more so for people who may move more slowly (young children, people with mobility limitations, etc.).

Based on our experiences with bike/pedestrian crossings on other roads with similar conditions (high vehicle speeds, high vehicle volume, obstructed sightlines from grade changes and curves), incremental improvements such as crossing enhancements or two-stage crossings are unlikely to substantially change driver behavior or improve cyclist/pedestrian safety. These designs still ultimately prioritize vehicle travel speeds over safety. Stoplights or underpasses are vital and should be prioritized at these locations.

### **Natural resources protection**

We appreciate the plan's discussion of Mississippi River Corridor Critical Area (MRCCA) protections. MRCCA rules will guide trail development near bluffs; we always encourage maximum protections for the fragile eroding bluffs in this area. Trail development should be sited outside of bluff setback areas whenever possible; where this is not possible the trails should be designed to limit erosion, users traveling off of the trail, stormwater runoff, etc.

MRCCA rules also include other provisions for public transportation and recreational facilities that will need to be followed. For instance, St. Paul's forthcoming MRCCA ordinance is likely to include a requirement for bird-safe (downward-shielded) lighting.

It's also important for the city to continue close collaboration with right-of-way owners who manage vegetation and natural areas along the trail. Ramsey County is finalizing its Battle Creek Regional Park Master Plan which includes a plan for expanded natural resources management and restoration within the park. The city and county should make sure that trail design and construction is synced with these management efforts.

Again, thank you for the opportunity to participate in the Point Douglas Regional Trail master planning process. We look forward to supporting the city in bringing these much-needed trail improvements to reality.

For the river,

A handwritten signature in black ink that reads "Colleen O'Connor Toberman". The signature is written in a cursive style with a light grey shadow effect behind the text.

Colleen O'Connor Toberman  
River Corridor Director