



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

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Dear Ms. Leatham:

Thank you for the opportunity to comment on the draft Spring Lake Park Reserve master plan and natural resources management plan (NRMP).

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.

Uniquely valuable park

Spring Lake Park is a particularly special riverfront site. Among the things that make it unique:

- It is the only Dakota County park located along the Mississippi River.
- It has a variety of native plant communities, most of which were classified by the DNR as high biodiversity significance.
- It has unique plant species found at few, if any, other sites in Dakota County.
- It is connected to hundreds of acres of largely undeveloped land, creating a rare corridor of natural land along the Mississippi River that is important pathway for wildlife movement. At the same time, the park represents a crucial refuge from surrounding agricultural and industrial land uses.
- The river is a migration corridor of global significance for hundreds of migratory bird species. Sites along the river such as Spring Lake Park are vital resting and nesting sites for migratory birds.

Because of these features and the fact that this is designated as a park **reserve**, FMR supports prioritizing the protection of the native plant communities and their inhabitants, and keeping this park as wild as possible.

Positive master plan elements

We appreciate several elements of the draft master plan, including:

- Engagement with tribal communities and a commitment to improved interpretation and better protection of Traditional Cultural Properties
- The addition of bison to the park
- Expansion of river access and river-oriented activities and programs
- Addition of equipment rental, which broadens access to recreation
- Expansion of winter recreation trails and facilities
- Attention to accessibility needs for visitors with differing abilities and needs
- Limiting large outdoor event spaces to the farm area, where the land is already degraded
- Redesign of the Upper Park picnic shelters and playground
- Planned protection and management of park-adjacent lands

Our recommendations for changes and improvements are discussed below and summarized at the end of the letter.

Level of development poses environmental concerns

We are concerned that the master plan promotes new development across too many areas of the park. The master plan and NRMP seem to hold two things in tension: the desire to offer as many recreational opportunities as possible, and the recognition that this park reserve is a fragile and important natural area. The ultimate development concepts fail to appear different from other metro-area parks in their scale and intensity. ***A park reserve should function differently from other regional parks. This draft plan does not accomplish that.***

While the plan notes that the park will be increasing from 12 to 15 percent developed, that doesn't fully address *where* development goes. The linear nature of the park makes it both especially important to wildlife as a migratory corridor, and especially vulnerable to disturbance because there is not that much area that can be set away from human activity. With development proposed across the entire linear park, few areas are left fully naturalized.

New trails and facilities across the park further fragment wildlife habitat and travel corridors. Every new trail serves to cut off and isolate wildlife populations, especially for very small animal species that won't cross trails. The same is true for some plant species.

The draft NRMP itself acknowledges that a recent trail expansion in the park "came at a cost to the site's natural resources, by disturbing and bisecting habitat, opening up forests, and placing barriers for animal movement. The trail also can act as a conduit for invasive species." Yet confusingly, the draft master plan also proposes adding more trails despite these well-documented harms.

A [recent study](#) by the Swiss Ornithological Institute shows that fewer birds and fewer bird species are present along trails, even when the trails have been there for decades. This park is part of an

Important Bird Area designated by Audubon Society; the needs of birds and other wildlife should be prioritized. This will require some areas of the park to remain undisturbed refuges.

All expansions of trails or facilities should undergo an environmental assessment before any final decisions are made, and the county should remain genuinely open to changing its plans if significant environmental impacts are identified.

We also suggest avoiding new turfgrass lawn areas, but instead demonstrating to the public how to have pollinator-friendly plants and lawns, including in gathering and recreational spaces as much as possible.

Trail network

Trails, even those designed and built to high standards, can have significant ecological impacts. In addition to habitat fragmentation discussed above, increased trails also create more “edge areas” that are less amenable to plants and animals and create corridors that facilitate the spread of invasive species. (This issue is noted in the plan as an existing challenge in the middle area of the park.)

Given the harm that trails can pose to wildlife, we evaluate proposed trails through the lens of, “Does this increase access to important areas of the park? Does that increased access outweigh the potential negative impacts of a new trail?” We hope to see Dakota County apply the same criteria.

It is unclear from the plan how many new trails are proposed in fragile bluff areas. We agree with the plan’s statement that “ravines, steep slopes, and bluffs pose severe constraints on development and are best left undisturbed.”

FMR is always concerned about the expansion of bluff trails and encourages that they be built only when necessary—for instance, for access down to the river in limited locations. (The Mississippi River Greenway is an example of a trail that had a significant negative impact on the bluff; this type of construction should not be repeated.) For reasons stated previously (i.e. wildlife impacts, increased invasive species), we also do not support the proposed addition of any new trails along the forested areas flanking the river.

The plan to add overlooks also needs further review: where will these overlooks be placed and how will they be constructed? Will tree removal be necessary, and if so, is that merited?

Any new trails should be soft-surface except where broader accessibility is required. Paved walkways and parking areas should be porous, particularly given the risks that stormwater runoff poses to bluffs.

While we support the expansion of winter uses on existing trails, we are confused by the separation between the two classic ski loops in the Upper Park. These trails would be much more functional if they were connected. Excellent signage is also needed wherever different groomed trail uses

intersect to prevent walking/snowshoeing damage to ski trails that quickly render the trails unusable and deter skiers from purchasing ski passes.

Buildings and structures

Given Spring Lake Park's uniquely pristine natural state, we feel that additional development should be kept to a minimum to retain the wild feel of the park. New buildings should be scaled back and located in areas that are already disturbed.

The addition of bison to the park (which FMR has supported) will draw significantly increased visitor traffic and offer new opportunities for education and programming. We are concerned about the impacts of adding so much other new development on top of what will already be added to support bison-focused visitorship.

We recommend eliminating proposed new campgrounds in forested corridors next to the river. Should campsites remain in the plan, they should be reduced in number and concentrated in one area away from the bluffs. Campsites in the forest along the river will bring an increase in weed species, litter, and tree and plant damage.

Campers will tend to wander throughout the bluff area, gathering firewood (even if not allowed), turning over rocks and woody debris, trampling vegetation and causing other disturbances to wildlife and habitat. The NRMP notes that the existing trails and campground are a source of invasive species spread and habitat disturbance: "The largest patch of garlic mustard in the park has established in the area of the campground."

The island campsites are less concerning, given that floodplain areas are more adapted to ongoing disturbances. However, litter, human waste, and invasive species spread are still risks that should be thoroughly addressed in future planning.

We also recommend eliminating the group bunkhouses at the retreat center, in the interest of having less development at the park.

We also suggest reconsideration of the tree canopy walk; without more detail in the plan, it is hard to assess the impact of this.

Many of the other visitor features, such as the trail rest areas, appear overbuilt in the examples shown. We encourage reducing new structures to only what is truly necessary for visitor comfort and accessibility, and emphasizing low rooflines, natural building materials and colors, etc. Park visitors come to see and experience nature, not to be boxed by with walls and roofs.

Natural Resources Management Plan recommendations

The NRMP should give greater emphasis to wildlife population declines. For example, page 56 mentions that "grassland birds have been in decline." This is true, but an understatement. Some

populations have declined over 50% in the last 50 years. The crisis needs to be stated more strongly as it emphasizes the need for grassland restoration (of which the county has been doing an excellent job).

Likewise for pollinators (page 58) with some populations, like the rusty patched bumble bee, declining almost 90% in the last 20 years. These are indicators of deeply concerning wildlife declines and demonstrate the urgent need to protect and expand habitat.

We also suggest a greater emphasis on research as part of the restoration process. Since the park has large areas to restore, it would be very valuable to compare different restoration methods and strategies in different areas, helping to inform the science for other practitioners.

Summary of recommendations

We recommend the following in the master plan:

- Maintain significant portions of the park as undeveloped, contiguous habitat.
- Conduct an environmental assessment of all proposed new trails or facilities.
- Reduce or eliminate proposed trail expansions, particularly on bluffs and in forest corridors along the river.
- Reduce new structures to only what is truly necessary for visitor comfort and accessibility; emphasize low-impact design.
- Carefully assess the proposed new river overlooks and tree canopy walk for environmental and scenic impacts; eliminate these features if the impacts might be significant.
- Eliminate the proposed new campgrounds in forested corridors next to the river. Should campsites remain in the plan, they should be reduced in number and concentrated in one area away from the bluffs.
- Eliminate the proposed group bunkhouses at the retreat center.
- Connect the proposed classic ski trails (on existing trails) to each other.

In the NRMP:

- Strengthen the level of urgency regarding wildlife population declines and the need for habitat protection and restoration.
- Place a greater emphasis on research as part of the land restoration process.
- Avoid new turfgrass lawn areas and impermeable paved surfaces.

Again, thank you for the opportunity to comment on these plans. FMR values its relationship with Dakota County Parks and we look forward to continuing as your partner in protecting and enhancing the Mississippi River and its surroundings.

We hope to see a revised master plan that recognizes Spring Lake Park Reserve's important role as the county's only park **reserve** and manages it a way that preserves that distinction.

If you'd like to discuss anything, please don't hesitate to contact Colleen O'Connor Toberman at 651-222-2193 x29 or ctoberman@fmr.org.

For the river,



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