



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

January 7, 2020

Dear MPRB commissioners and staff:

Thank you for the opportunity to comment on the Parks for All comprehensive plan.

Friends of the Mississippi River (FMR) values the Minneapolis Park and Recreation Board (MPRB) as a crucial partner in our shared work to create thriving natural spaces. We're grateful that Minneapolis' expansive park system is rightfully lauded as one of the nation's best, yet we also recognize that there is still much room for improvement. MPRB has worked hard to grow and evolve and we look forward to working together as this continues.

More is being demanded of our parks than ever before. Our parks must serve an increasingly diverse resident population and do so in a more equitable way. At the same time, parks are crucial havens for plants and wildlife facing increasing pressures from climate change. Balancing all of the needs of all of the species who live in our city is not easy.

FMR supports the goals and most of the strategies in the Parks for All plan. To keep our comments reasonably brief, we've focused them on areas where we recommend changes.

Goal 1: Foster belonging and equity

The Parks for All plan lacks any discussion of how all of our parkland came to be. Minneapolis was inhabited by Indigenous people well before European colonization. Our city's land was stolen from the Dakota through unjust and broken treaties. It's impossible to achieve equity in our parks system without acknowledging this truth, yet colonization and land theft are not even mentioned once in this document.

We are aware of MPRB's ongoing relationships and engagement with Indigenous community members. We recommend adding a strategy that elevates this engagement and commits to an in-depth process to explore full acknowledgement of and reparations for MPRB's stolen land.

Strategy 9: Continue to evolve community engagement processes to be more inclusive and representative of the diverse populations.

In support of this strategy, FMR recommends significant changes to MPRB's community engagement structures. The current Community Advisory Committee (CAC) process concentrates power and visibility within in the hands of a small portion of community members who have sufficient privileges and resources to attend numerous lengthy meetings without transportation assistance, childcare, interpretation, or compensation. In addition, the CAC meeting structure and decision-making process are rooted in white supremacy and are not universally preferred or effective across the incredibly diverse range of MPRB stakeholders.

In our staff members' recent experiences as CAC members, we have found them to be insufficiently diverse, ineffective at times, and sometimes flat-out toxic. In some CAC meetings we've witnessed bullying and contentious conversations that end in personal harm and damaged relationships rather than constructive outcomes.

CACs are also disconnected from other ways that MPRB engages community members through more culturally responsive methods. There is no clarity about how these other feedback loops connect to CAC processes. CACs are given official "advisory committee" status to the commissioners that these other channels are not, implying that CAC input carries more weight than other engagement processes that are actually engaging a broader range of residents in more effective ways.

Better community engagement processes would:

- Provide better clarity about how all engagement methods will inform recommendations to MPRB commissioners
- Avoid privileging CAC recommendations above the recommendations of others deeply engaged in the planning process (cultural consultants, etc.)
- Incorporate broad community wisdom as well as technical subject-matter expertise
- Include skilled facilitation to work through disagreements and tensions in constructive ways that don't leave participants feeling bullied, attacked, or oppressed
- Make engagement processes more accessible to wider participation
- Provide compensation for community members who share significant time and expertise

We would be happy to discuss this further with you.

Goal 2: Steward a continuum of recreation and nature

Aside from Goal 9 related to financial sustainability, the two ecology-focused goals (Goal 2 and Goal 6) have the fewest number of strategies – 13 and 12, respectively. Goal 2's 13 strategies pale in comparison to Goal 1's 27 strategies or Goal 3's 25. It's somewhat unclear whether this reflects a less-complex goal (unlikely) or whether this is because there is far more work to be done determining strategies for these goals. However, there are a number of potential strategies that seem to have been left out.

The most glaring omission is that there is no mention of ecological or climate resiliency, concepts that will be extremely important for the preservation of MPRB's forests and natural areas. If we are not striving to increase resiliency (to climate change, invasive species, etc.) through increasing native species diversity and managing for invasive plant species, then we risk losing these natural areas altogether. MPRB should include a strategy committing to increasing native plant diversity in order to build resiliency of MPRB's natural areas.

Invasive species management could easily warrant its own strategy. It is somewhat implied within strategy 9 (Increase the acreage *and quality of* natural areas), but it deserves to be called out separately. Invasive plant and animal species are a massive threat to species diversity, water quality, and recreation. Without managing for these species, MPRB will not be able to steward a continuum of recreation and nature. MPRB should add a strategy of removing invasive plant and animal species and replacing them with native species appropriate for that particular ecosystem.

Strategy 1: Balance preservation of historic, cultural and scenic resources with natural resources and contemporary recreation needs in park management and development decisions.

Strategy 2: Support both the preservation of higher quality of natural areas for ecosystem benefits and access to natural areas for public benefits.

Strategies 1 and 2 discuss the ideas of balancing both ecological and recreational benefits but need to be stronger about their location and prioritization. It is important that we balance interest for both active and passive recreation, but we must also be smart about where ecological and recreational benefits may be at odds. We need to be more explicit about locating high-intensity recreation outside of ecologically sensitive or rare communities. Mountain biking on the fragile Winchell Trail and through the rare prairie bowl at the 36th St. Oak Savanna within Mississippi Gorge Regional Park is just one example of where a higher-intensity form of recreation would irreparably harm the site's ecology.

Goal 3: Provide core services with care

In general, the Parks for All plan fails to go deep enough on questions of policing and community safety. Our community is undergoing a serious examination of whether a police force should exist at all, and if so, how we can put better limits on when and how law enforcement becomes involved in a safety issue. Given how valuable parks are to Minneapolis residents, and how many disparities exist in both perceived and real safety within our parks, MPRB should be at the forefront of innovation and community engagement around public safety.

We recommend adding a strategy that explicitly commits to a thoughtful, robust community process for reforming MPRB's safety practices, including a serious examination of how policing may or may not fit into that.

Strategy 8: *Explore avenues for participatory governance and co-creation with community groups.*

We strongly support this strategy. We note that marginalized community groups often lack the capacity to be full participants in co-creation or other engagement processes. This strategy must be supported with robust funding to build community capacity for this kind of work.

Strategy 10: *Ensure parcels considered for disposition meet at least one of the following listed criteria: removing the parcel does not diminish recreation or environmental function of the park system, the parcel is not accessible by the public, the parcel is not part of an adopted park plan, or the parcel is specifically identified for disposition in an adopted master plan.*

We recommend removing “not accessible by the public” from this list of criteria. Land that lacks trails or recreational facilities can serve as the highest-quality habitat and contribute to MPRB’s ecological goals.

FMR also recommends requiring that parcels considered for disposition meet *all* of the remaining listed criteria. This would ensure that parkland disposition *both* serves MPRB’s recreational and environmental goals *and* is also vetted by the community through planning processes.

Goal 5: Expand focus on health equity

Strategy 1: *Increase safety at parks through multiple strategies...*

The strategies listed in this goal present a disappointingly limited view of community safety. Yes, park design and activation can promote safety. But programming and engagement, particularly for youth, are also a proven tactic for promoting community safety and preventing crime. Staffing changes, whether in scheduling, hiring, or training, are additional tactics. We encourage MPRB to prioritize a broad range of safety tactics and to include more of them in this section.

Goal 6: Strengthen ecological connections

Again, Goal 6’s 12 strategies pale in comparison to many of the other goals. There are ample opportunities to add important potential strategies that are currently left out.

MPRB would do well to remember its vision when discussing issues of ecology:

“The Minneapolis Park and Recreation Board shall permanently *preserve, protect, maintain, improve, and enhance* its natural resources, parkland, and recreational opportunities for current and future generations of our region including *people, plants, and wildlife.*”

If the vision is to “protect, maintain, improve, and enhance” natural resources and parkland, invasive species management and restoration are two concepts that must be called out as

individual strategies. Invasive plant and animal species are a massive threat to species diversity, water quality, and recreation. Without managing for these species, or working to restore native habitat, MPRB will not be able to steward a continuum of recreation and nature.

There is also no mention of prioritizing habitat restoration on newly acquired parkland, or actively seeking opportunities to add more natural habitat. Many of the other goals use the word “create.” Including a “create” strategy within this goal would show an active push toward prioritizing more habitat. Elements of this idea are included in the current strategies of reducing mowed surfaces (strategy 11; though there is no mention of replacing mowed surfaces with native habitat) and expanding natural areas protection (strategy 2), but this should be elevated into a more active strategy to seek opportunities to create and restore more habitat.

There is also no mention of corridors. MPRB benefits from owning and managing land along one of the world’s most important ecological corridors: the Mississippi River. Corridor-building is an extremely important strategy for ensuring that natural areas remain diverse, connected, and able to withstand future conditions. When planning for new parks and natural areas, MPRB should look for opportunities to connect existing parkland to create natural corridors, and should include a strategy of connecting current and future natural areas in order to promote resilience.

Again, to ensure the future of MPRB’s natural resources, ecological and climate resiliency must be considered, called out, and planned for. If we are not striving to increase resiliency (to climate change, invasive species, etc.) through increasing native species diversity and managing for invasive plant species, then we risk losing these natural areas altogether. This goes hand-in-hand with ensuring that migration corridors are available to plants and animals.

Goal 7: Connect through communications and technology

Strategy 11: Create a sustainable method for community engagement and outreach to foster awareness of and build trust in the park police.

Community trust is earned, not given, and it’s not simply a “communications issue” or an “awareness issue” when community members have well-founded distrust of law enforcement agencies. We recommend changing this wording to, “Create a sustainable method for community engagement and outreach to effectively respond to residents’ concerns about park safety.” This relates to our comments about needing a broader view of public safety.

Goal 8: Cultivate a thriving workforce

Strategy 7: Recognize community members for their wisdom, insight and feedback when seeking community input.

This recognition should include financial compensation for community members who share extensive time and/or expertise with MPRB.

Thank you for the hard work you have put into Parks for All. We're looking forward to many more years of productive collaboration to make Minneapolis' parks the best they can be.

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