

January 10, 2019

Re: Comprehensive Plan 2040

Friends of the Parks and Trails of St. Paul and Ramsey County, a local non-profit membership organization, was established in 1985 when a development was proposed for Crosby Farm Regional Park. A group of concerned citizens banded together to speak on behalf of our priceless parks, trails and open spaces.

The introduction to the Parks, Recreation, and Open Space Chapter of the 2040 Comprehensive Plan draft states, “The Saint Paul park system comprises a large, diverse and vibrant network of people, spaces and facilities that is recognized by Saint Paul residents as one of the city’s great shared assets.”

It goes on to say that, “Park facilities and programs improve the quality of life... foster public health...serve an important role for the city’s youth by providing safe and healthy places and activities...connect us to the Mississippi River and lakes... and are an important component of sustainable economic development, drawing and retaining residents, increasing nearby property values and attracting businesses.” We couldn’t agree more.

We appreciate and applaud the recognition this draft gives to not only the environmental benefits of parks, recreation, and open spaces, which are more intuitively acknowledged, but also the economic, social, and health benefits they provide. **Parks are fundamental building blocks when seeking environmental and economic sustainability**, one of the five goals guiding the Parks, Recreation and Open Space Chapter.

We recognize this draft was composed with the intention of being a more high-level document than previous iterations. Bearing that in mind, we strongly encourage incorporating language into the Parks, Recreation, and Open Space Chapter that reiterates the **importance of community input in development planning and vigilantly maintaining public access throughout the system.**

**It is important that mention be made of the No Net Loss Provision in the Saint Paul City Charter.** This provision is highly relevant to all development decisions involving our park system and yet there is no reference to it.

There is currently no official map of the city's parkland, making the goals of maintenance and asset management particularly challenging. **We recommend the city make mapping parkland a priority.**

**The current Comprehensive Plan calls for a parkland zoning designation.**

That designation has yet to occur. When reviewing the six Focus Areas of the entire Comprehensive Plan draft (equitable cities, aging in community, community/public health, economic development, resiliency, and urban design) parkland zoning would be a tool to help achieve them.

There is no mention in the draft of the **Parkland Dedication Ordinance**. While we recognize this is a high-level document, given the goals of the plan and the value statements, and knowing it will be referenced when making funding and development decisions, it may be helpful to make note of this valuable tool that can help us reach the desired outcomes of resiliency and sustainability.

Specific item notes on the Parks, Recreation and Open Space Chapter: **red text** indicates additional suggested language and ~~strikethrough~~ indicates suggested text removal.

**Policy PR-1.** Ensure equitable access to Parks and Recreation programs, resources and amenities **including, but not limited to, racial, ethnic, income, ability, and geographic diversity.** (The goal is that the users of the system are reflective of the population, not solely addressing physical access to parks but actual equity of use and opportunity. This also relates to **PR-4**.)

**Policy PR-9.** Use **systematically-collected** customer and resident feedback on needs, satisfaction and trends to improve park experience and bring in new users. (We make this recommendation to clarify between systematically collecting valuable feedback on which to make important decisions versus relying on a complaint-based system. Too often, when systems are based on complaints, it's the "squeaky wheel that gets the grease" and those that don't realize the necessity of speaking up or feel uncomfortable doing so are left behind.)

**Policy PR-10.** Embrace and integrate emerging cultural and recreation trends, particularly those that meet the recreational needs of youth, underserved populations and emerging resident groups. (How will these trends be determined?)

**Policy PR-24.** Develop shared-use facilities as a first option when contemplating new or replacement indoor recreation facilities **while recognizing the importance of maintaining public access**. (Privatization of public facilities doesn't seem to be the goal here so it's important for that to be put in writing somehow.)

**Policy PR-26.** Use data-driven evaluation of **all** park assets to develop a maintenance and replacement schedule, and plan for future budgetary needs. (We recognize the 2017 Ameresco report regarding capital assets, but this will be difficult to accomplish without comprehensive and accurate mapping of all parkland resources. The city needs to prepare accurate boundaries of parkland within the city to be able to accurately monitor those resources, thus our recommendation to make such mapping a priority.)

**Policy PR-29.** Seek out partnerships with private entities to finance capital and maintenance costs of Parks and Recreation facilities without compromising good design solutions, **reducing public access** or over-commercializing the public realm.

**Policy PR-34.** Prioritize safety and equity when filling gaps in the trail and bikeway system to ensure seamless connections throughout the city for pedestrians and bicyclists of all ages and abilities. (How will equity be used in this way? What approach will be used to evaluate?)

**Policy PR-40.** Provide consistent wayfinding signage in each project or park so that it is recognizable as part of the broader City system **while being cognizant of the negative impacts of signage in natural areas**.

**Policy PR-41.** Involve staff from the Department of Parks and Recreation **and park and community advocacy groups from the beginning in the early stages** of discussions regarding large-scale land redevelopment sites. (We acknowledge staff plays an important role when meeting with developers at the beginning of projects and we certainly don't intend for this to be an interference with that. However, we believe it is reasonable that the public should be involved in the early stages of large-scale developments and not just after potential uses have been whittled down to certain choices.)

**Policy PR-42.** Address physical park encroachments that impair use through effective parkland management and protection. (Accurate mapping of existing parkland is required so that this can be done. It is not possible without it.)

We thank you for this opportunity to comment and congratulate city staff on the extensive community engagement and outreach they have undertaken throughout this process. As an organization made up of community members, we recognize the importance of actively engaging with our fellow citizens.

We encourage this philosophy of citizen engagement as the city refers to the Comprehensive Plan to 2040 and beyond. As it was done in the creation of the document, we hope, too, it will continue in the implementation, calling for robust stakeholder involvement and identifying the importance of social capital while upholding the Core Values throughout all the Focus Areas and Topic Chapters.

Sincerely,

Shirley Erstad  
Executive Director