# METROPOLITAN COUNCIL 390 North Robert Street, St. Paul, MN 55101 Phone (651) 602-1000 TDD (651) 291-0904

**DATE:** April 2, 2007

**TO:** Metropolitan Parks and Open Space Commission (MPOSC)

**FROM:** Arne Stefferud, Planning Analyst-Parks (651-602-1360)

**SUBJECT:** Continued Discussion on 2008-2013 Regional Parks CIP Structure

#### Introduction/Background:

At its meetings on February 13 and March 6, 2007 the Metropolitan Parks and Open Space Commission held discussions on developing the 2008-13 Regional Parks Capital Improvement Program (CIP).

The Commission began to analyze the existing Parks CIP structure and began to consider a change to that structure that insures each agency receives a percentage share of a Parks CIP appropriation based on the percentage share proposed for that agency in the Parks CIP.

The analysis addressed the following policy issues:

- 1. How should projects be ranked and appropriations for the Parks CIP distributed?
- 2. What should be the basis for determining a park agency's share in the Parks CIP?

The proposal being considered would structure the 2008-13 Parks CIP by distributing appropriations for the CIP based on the population of each park agency and spending those funds on park agency-prioritized lists that have been approved by the Metropolitan Parks and Open Space Commission and the Metropolitan Council.

### **Analysis:**

At the March 6 meeting, the Commission requested a side-by-side comparison of splitting the 2008-13 Parks CIP in the following ways:

Option 1: The population of each park agency (per capita). The premise of this approach is that it distributes CIP funds equally to all persons in the region.

Option 2: Weighting the population of each park agency by 60% and weighting the amount of non-local visits each park agency received in a 1998-99 visitor origin study by 40%. The premise of this approach is that it reflects the amount of non-local visits to the park system as a system of parks that serves a regional and state-wide clientele. The weighting of 40% non-local visits is due to the fact that 40% of all visits were from persons who lived outside the host park agency's jurisdiction based on the 1998-99 park visitor study results.

Option 3: Weighting the population of each park agency by 50% and weighting the amount of non-local visits each park agency received in a 1998-99 visitor origin study by 50%. The premise of this approach is similar to option 2 but gives equal weight to population and non-local visits.

Option 4: Weighting the population of each park agency by 80% and weighting the amount of non-local visits each park agency received in a 1998-99 visitor origin study by 20%. The premise of this approach is similar to option 2 but gives more weight to population and less weight to non-local visits.

Option 5: Weighting the population of each park agency by 60%, weighting the amount of visits to each park agency by 20% from the most recent visitor estimate, and weighting non-local visits to each park agency by 20% based on a 1998-99 visitor origin study. The premise of this approach is to factor in total visits along with non-local visits and population. This approach provides more funds to agencies with established park systems that receive more use relative to other agencies with few parks and trails or few facilities in their parks and trails.

Option 6: Weighting the population of each park agency by 93%, and weighting non-local visits each park agency had by persons who lived outside the Metropolitan Region based on a 1998-99 visitor origin study. The non-local visits are weighted 7% based on the fact that only 7% of all visits to the park system were by persons residing outside the Metropolitan Region. The premise of this approach is to factor in only those non-local visits by persons living outside the region by the amount of that type of visit compared to all visits. The visits by persons residing within the Metropolitan Region are considered as part of the agency's population.

**Table 1: Comparison of Parks CIP Share Alternative Methods** (page 4) illustrates these options and also illustrates the amount proposed for each agency in the 2006-07 CIP. The yellow shaded boxes illustrate the highest CIP share an agency would receive under these options, and the blue-green shaded boxes illustrates the lowest CIP share an agency would receive.

The agency's population in 2005 was used for this analysis. There will be an updated 2006 population report published in July that could be used since it would be the most recent data available. If 2006 population data is used, the percentage share for each park agency will change from what is shown in Table 1.

At the March 6 meeting, the Commission also discussed the proposal to merge the Acquisition Opportunity Fund into the Regional Parks CIP. The premise for merging the two "pots" into one was that a grant from the Acquisition Opportunity Fund financed with Council bonds and projected LCCMR funds is comparable to a grant from the Regional Parks CIP financed with Council bonds and State bonds. Therefore both "pots" should be combined and split among the park agencies.

The Commission's conclusion on this proposal was that the Acquisition Opportunity Fund should continue to be separate from the Regional Parks CIP for the following reasons:

- 1. Strategy 2c of the 2030 Regional Parks Policy Plan calls for a balance between investing in acquisition and investing in development. If a decision on fund allocations must be made, priority is given to investing in acquisition. The Parks CIP primarily funds rehabilitation and development projects. By keeping the Acquisition Opportunity Fund separate from the CIP, a balance in investing in acquisition and development can be maintained.
- 2. All park agencies have equal access to Acquisition Opportunity Fund grants. Furthermore, a cap on the amount an agency can receive from the Fund is in place to allow more grants to be disbursed to more agencies. Consequently, there is no disproportionate share of Acquisition Opportunity Funds that will go to one agency.

Table 1: Comparison of Parks CIP Share Alternative Methods

Blue-green shaded boxes are lowest agency share and yellow boxes are highest agency share of all methods

Park Agency	2006-07 CIP Share	Option 1: Per Capita Share Method	Option 2: 60% Pop., 40% Non- local Visits	Option 3: 50% Pop., 50% Non- local Visits	Option 4: 80% Pop., 20% Non- Iocal Visits	Option 5: 60% Pop., 20% Total Visits, 20% Non- local Visits	Option 6: 93% Pop., 7% Non- local Visits Outside Region
Analya Carrety	0.00/	11 60/	40.60/	40.20/	44.40/	10.40/	44.00/
Anoka County	9.2%	11.6%	10.6%	10.3%	11.1%	10.4%	11.2%
City of Bloomington	2.2%	3.0%	2.9%	2.8%	2.9%	2.7%	2.9%
Carver County	2.2%	3.0%	2.2%	2.0%	2.6%	2.2%	3.0%
Dakota County	8.7%	13.9%	9.1%	7.9%	11.5%	9.3%	13.3%
Minneapolis Park Board	19.1%	13.8%	20.8%	22.6%	17.3%	23.0%	14.7%
Ramsey County	8.9%	8.1%	9.5%	9.9%	8.8%	9.1%	7.8%
City of St. Paul	14.6%	10.2%	16.0%	17.5%	13.1%	14.5%	11.9%
Three Rivers Park District	25.5%	24.2%	19.6%	18.5%	21.9%	20.0%	23.4%
Three Rivers/Scott County	3.4%	4.1%	3.0%	2.7%	3.5%	2.9%	3.9%
Washington County	6.2%	8.0%	6.2%	5.8%	7.1%	6.1%	7.8%
Total Percent	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

# Next Step

The Commission requested that this information be shared with the regional park agencies. The Commission asked the park agencies to submit comments to them via email prior to the April 10 Commission meeting. Following are comments submitted by regional park agencies as of April 2, 2007. Additional comments from park agencies received after April 2 will be submitted to the Commission at its April 10 meeting.

Comment submitted by James Luger, Washington County Parks Director at the March 6 MPOSC meeting.

After reviewing the various scenarios presented for the 2008 - 2013 Regional Parks CIP Formula I have the following comments:

As everyone has stated the CIP distribution formula should be relatively simple and transparent. During our meeting this past Monday [Feb. 26] I listened to the concerns of several of the agencies who believe they will lose if the formula is changed. Many of these same agencies are receiving a large portion of the existing CIP based on the current formula. At the same time these agencies are receiving additional State funding based on the efforts of their legislative delegations. Also, discussed at that meeting was that there should be a CIP formula adjustment, which would reflect acquisition opportunity grants since a portion of CIP funding is likely to be earmarked for this purpose.

As to the CIP formula Washington County believes the formula should be based on one of the following:

- a. The CIP be based on 100% agency population or
- b. The CIP be based on 80% agency population and 20% weighted non-local visits

Also, the emergency acquisition funding should not be considered when looking at the general CIP funding. If in fact it were considered, there would be even less funds available to the younger growing implementing agencies who must acquire now.

There are many potential variables that can be considered in developing the formula. One could make the case that user numbers do not truly reflect impact in the regional park system. An example would be: Campgrounds have much more impact then picnicking, and picnicking has much more impact then trail use. Several of the implementing agencies have large user numbers based on trail use, some have campgrounds [and] others don't. Additionally, there are several of the systems whose use is more local then regional. If the system is truly a regional system those agencies serving a more local population should receive less regional funding.

Again, Washington County would suggest that the simpler the formula the

more transparent it is. In that spirit, let's reduce the variables and base the formula on easy to understand and practical components. We can continue to utilize funding formulas that benefit some agencies more than others, or provide a level playing field.



# **CARVER COUNTY PARKS**

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11360 Hwy. 212 West, Suite 1 Cologne, MN 55322-80 Phone (952) 466-5200 Fax (952) 466-5223

April 2, 2007

Glen Skovholt, Chair Metropolitan Parks and Open Space Commission 390 North Robert Street St. Paul, MN 55101

Dear Chair Skovholt and members of the Metropolitan Parks and Open Space Commission:

Carver County supports a CIP process that is transparent and is understandable. The per capita share method is the clearest and fairest method for distribution of CIP resources.

I have concerns about incorporating visitor use numbers. The use of regional system visit data is subjective. Visitor use numbers do not represent the cost of service and cost of infrastructure required to support the visitor activity. Activities requiring little service and infrastructure are counted the same as activities requiring more service and infrastructure.

There is little justification for selecting one method which incorporates a percentage of visitor numbers over another. These numbers are affected by proximity to population centers, geographic location of the park(s) in relation to another agency boundary or non-metro area and in some cases the type of facility offered in a park. Various biases can be formed based on an agencies disposition to these factors.

Agencies that are in an acquisition phase are at a disadvantage when considering visitor numbers. These agencies are foregoing development when they would be better served if they were creating facilities which attracted more people. People from a developing agency will frequent built parks of a developed park system that have flush toilets, paved roads, paved trails and signature park features.

The per capita approach works to level the playing field among agencies by removing subjective visitor count data, eliminates biases based on proximity and is neutral on an agency's level of development.

Sincerely,

Martin Walsh Parks Director



Glen Skovholt, Chair Metropolitan Parks & Open Space Commission Metropolitan Council 390 North Robert Street Saint Paul. Minnesota 55101

Gregory J. Konat, Director

Dakota County Western Service Center 14955 Galaxie Avenue Apple Valley, MN 55124

Physical Development Division

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Environmental Mgmt Dept
Farmland & Natural Areas Program
Office of GIS
Parks Department
Office of Planning
Surveyor's Office
Transit Office
Transportation Department
Water Resources Office

April 2, 2007

Dear Chair Skovholt and members of the Metropolitan Parks & Open Space Commission:

Thank you for providing the opportunity to comment on the evaluation of a new CIP structure for the Regional Parks System. The CIP structure needs to be adaptive to changing system priorities. A contemporary and strategic CIP is essential. Dakota County appreciates the MPOSC willingness to consider the new CIP priorities of the system provided by the growth agencies within the context of the other implementing agencies.

# **CIP Funding Distribution**

Dakota County supports that allocated CIP funds are distributed to all implementing agencies, in proportion to a prescribed percentage, according to the adopted Metropolitan Council cost share approach.

The only suggestion is in the case of partial funding, that agencies can use the distributed CIP funds for any of its projects within the approved CIP. This allows agencies to fit partial funding to the best-suited CIP projects.

#### **CIP Park Agency Share**

Dakota County supports the per capita CIP share alternative.

The per capita CIP share alternative is:

- equitable and fair, distributing CIP funds equally to all persons within the region.
- dynamic and responsive to changing regional population. The CIP approach recognizes and funds existing population and increases funds to agencies as its population grows.
- strategic to new and changing system priorities. It recognizes the importance of the upcoming agencies providing park development to support the growing use of the system.
- *transparent, simple and defendable*. The per capita method has a proven track record with other agencies, programs and by legislators.

# **Use of Visitation Approach**

Dakota County is concerned about any use of visitation within the CIP cost share approach. The visitation approach is:

- based on data that is *antiquated* and likely incorrect *reducing the credibility* of a fair share.
- included within the O&M formula and already provides compensation to the high visitation regional agencies.

Thank you for considering these comments.

Respectfully,

Steve Sullivan

cc: Greg Konat, Dakota County Physical Development Director



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Operations Center 3800 Bryant Avenue South Minneapolis, MN 55409-1000 Phone: 612-370-4900 Fax: 612-370-4831

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www.minneapolisparks.org

Equal Opportunity Provider of Leisure and Recreational Services

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March 28, 2007

Mr. Glen Skovholt, Chair Metropolitan Parks and Open Space Commission Members Metropolitan Council 390 N. Robert St. St. Paul, MN 55101

Re: Proposed Regional Park CIP Formula Revisions

Dear Mr. Skovholt and Commission Members:

Thank you for giving us another opportunity to comment on the numerous CIP formula revision proposals. We have presented several ideas over the past year to give greater fairness and simplicity to the system, and we still support those strongly. We urge you to at least make sure that all agencies get their entire percent share of the CIP with no agency's projects bumping another's, and that each agency prioritizes their own projects. Just those changes would be a huge, positive step forward for all of us in planning projects, obtaining matching funds, and getting things done. We believe that most of the Implementing Agencies (IAs) are in support of the above ideas. Therefore, they should be enacted first, separate from any formula changes. It sends a clear message that we are willing to cooperate with each other for the greater good of the metro regional parks.

The next steps we can support together are to enact a supplemental dedicated park funding tax increase, Chair Bell's regional parks foundation, and a regional park dedication fee, again to the benefit of all IAs and their unique needs. If we achieved those initiatives, the endless CIP formula discussions could cease, as there would be much more money to go around.

As to the continuing idea of CIP formula revisions our basic position is as follows:

The only fair way to gauge need is to look at where the majority of visits go, and to use ALL visits as the formula, or strongly weighted non-local visits combined with population. To do otherwise is to discriminate against the most disadvantaged metro residents, those in the urban core areas, and to then shoulder them with the cost of the millions of visits (4,000,000+ to Minneapolis alone) from the outlying areas. As we develop the state parks for the metro, and as state parks aren't funded based on visitor origin, the metro regional parks should not discriminate based on origin either. Attached please find additional pertinent information in response to other comments and proposals.

Sincerely,

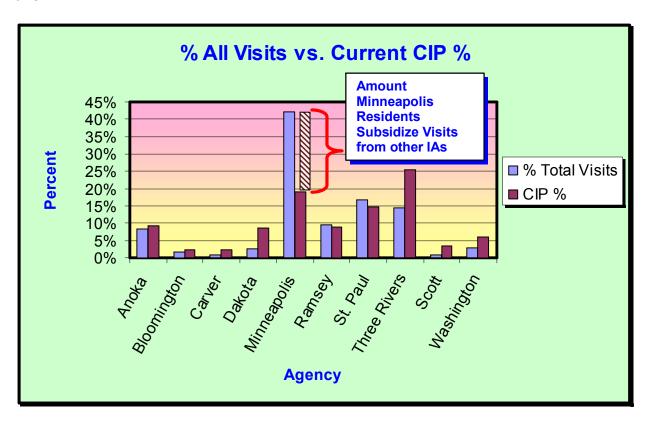
Jon Gurban Superintendent

Attachment

Please consider the following points as you consider formula revisions:

Population is acceptable in a formula revision as long as they are combined with very heavy "total visits" weighting, or very heavy weighting of non-local visits.

The premise behind using residents is that then everyone gets an equal share of the pie. However, the glaring flaw in this reasoning is that then Minneapolis residents are shouldered with picking up the tab for the visit impact of over 4,000,000 people from outside of Minneapolis, and it is unfair to have the poorest residents pay to host the wealthiest residents. See graph below illustrating the disparity of percent visits compared with percent of CIP.



There should be NO additional formula factor for camping, along with reduced weighting of trail usage, as has been proposed.

We support full weighted counting of all visits, including trail visits, as the trails are not just a strip of asphalt, there are significant other facilities, both support and complementary, adjacent to trails, that also have to be operated and maintained regularly to keep the trails accessible, enjoyable and usable, including turf (mowing and other care), trees (forestry operations), lakes and stream management, trash pickup, debris removal, vandalism repair, policing, brush clearing, restoration and management of native species, maintenance of picnic areas with tables and grills and benches, fences, water fountains, marketing and

informational web design, signage & kiosks, lights, access paths, parking, curb ramps, restrooms, retaining walls, steps, shelters, stormwater management, bridges, parkways, etc.

In addition, the campgrounds do charge to use the campsites at a single point of controlled access, while our urban parks and trails are open to all at any time, from almost any point, free of charge, and are also used by commuters and to travel to beaches, significant sights and the many free events held in our parks. Campers can also generally afford the fees needed to maintain camp sites, given the expensive vehicles, food and drink, equipment, gear and supplies that they also being in with them to experience a "natural" setting. Trails also take substantial abuse from the elements, and they themselves must be continually maintained and rebuilt to be usable.

In addition, Michael P. Schmidt, MPRB Manager of Operations states:

"As a person involved with camping when I was with State Parks and with Wright County, I do not agree with the idea that campers are a greater burden on an agency than day visitors. Campers come to a facility and to a large degree are self contained. Day visitors use everything and bring nothing, they expect the park to have things ready for them. Campgrounds are a finite operation, when they are full they are full, you can plan your operation based upon that capacity. Day visitors can change by the hour almost, with no controls on the number of people at a particular facility."

We are strongest on the fact that we run State Parks in the metropolitan region. The State wants parks in the Metro but does not want to build or maintain them, thus we get State money through the Met Council to do that job.

At Splitrock Lighthouse Park or Gooseberry Falls Park, visitors are not only welcomed but courted. If visitors are important to outer non-Metro Parks they are just as important to Metro Parks.

So we need to make sure in the new formula that visitor use is rated high (along with their wear and tear) as well as getting new visitor surveys and numbers for the formula. Using 10 year old data does not reflect the increase in our Parks the last 10 years, especially on the Central Riverfront in Minneapolis.

Not counting all visits is discriminatory, and shoulders the poorest people of the region with the cost of the most visits, and you are telling them they don't matter.

We do need to plan for the system's future. Each agency has different needs, and is at a different point in its evolution. We also need to address current needs and heaviest demand, put substantial dollars where people are going, not where they might go.

Urban agencies brought land and facilities into the system at no cost to the system. Should others do so as well? Or should those that brought land into the system receive a special weighting factor to credit them for those unreimbursed expenses.

All agencies need to also find matching funds wherever they can, as this only helps the system.

We need to recognize that some projects fall outside of system – they are too large, or don't fit system criteria, or due to uncontrollable outside influences (e.g., Lake of the Isles flood mitigation caused by adjacent urbanization). All agencies may experience this at some point. Such funding should not be counted as part of an agency's allocation as this is not a Metro Council MPOSC policy, and should not be part of the CIP discussions.

If the MPOSC wants to talk about population only, then that takes away from the "you pay where you play" idea we've used traditionally. If so, how will you address the impact of almost 5,000,000 people coming to Minneapolis and using our parks, but they don't have to pay for maintenance of those parks?

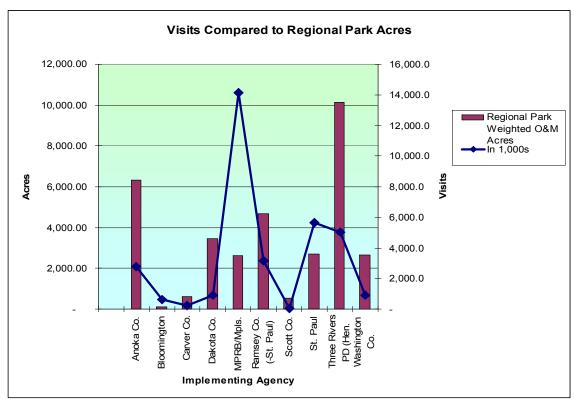
In thinking about statistics and other formulas we've also compared total visits to regional park acres (not including water) on the same chart. On this chart you can easily see the disparity of land versus visits, with the urban core receiving the highest number of visitors in relation to the amount of land they have.

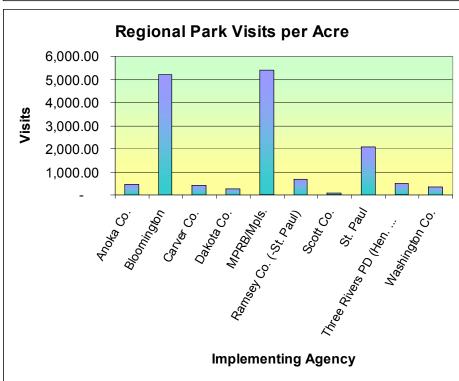
# Metropolitan Council Regional Parks Visits per Regional Park Acre

Agency			
	Visits per Acre	Regional Park Weighted O&M Acres	In 1,000s
Anoka Co.	439.26	6,314.03	2,773.5
Bloomington	5,225.81	115.14	601.7
Carver Co.	406.31	618.00	251.1
Dakota Co.	257.76	3,440.80	886.9
MPRB/Mpls.	5,396.60	2,617.50	14,125.6
Ramsey Co. (- St. Paul)	677.75	4.654.08	3,154.3
,		•	48.0
St. Paul			5,632.1
Three Rivers PD (Hen. Co Mpls. &	,	,	ŕ
Bloomington)	497.47	10,135.19	5,042.0
Washington Co.	345.89	2,665.00	921.8
	Bloomington Carver Co. Dakota Co. MPRB/Mpls. Ramsey Co. (-St. Paul) Scott Co. St. Paul Three Rivers PD (Hen. CoMpls. & Bloomington) Washington	Sloomington   S,225.81     Carver Co.	Anoka Co. 439.26 6,314.03  Bloomington 5,225.81 115.14  Carver Co. 406.31 618.00  Dakota Co. 257.76 3,440.80  MPRB/Mpls. 5,396.60 2,617.50  Ramsey Co. (-St. Paul) 677.75 4,654.08  Scott Co. 86.80 553.00  St. Paul 2,085.68 2,700.36  Three Rivers PD (Hen. CoMpls. & Bloomington)  Washington 497.47 10,135.19

Not incl. open water

33,437.0





In closing, our overarching recommendations are still those that benefit all agencies, including:

Each agency should get their full percent of the CIP, whatever is allocated, no agency's project bumps another agency's project.

Agencies should decide their priorities and report to the MPOSC.

MPOSC still has their normal oversight, system planning, policy planning, and master plan review authority.

Strongly support working together to implement a regional park dedication fee, which could bring in over \$100,000,000 over the next 20 years at only \$250 per net new household.

Combined with Chair Bell's foundation idea, and a jointly lobbied dedicated park funding tax increase, we could make a serious dent in the current and future needs of ALL agencies, instead of just fighting over ever dwindling resources.

The above is the only realistic way to completely and fairly funds the system, assuming 100% weighting of ALL visits in the formula for CIP fund dispersal.

#### DIVISION OF PARKS AND RECREATION



# CITY OF SAINT PAUL Mayor Christopher B. Coleman

Bob Bierscheid, CPRP Director 300 City Hall Annex 25 West Fourth Street Saint Paul, Minnesota 55102 www.ci.stpaul.mn.us/depts/parks Telephone: 651-266-6400 Facsimile: 651-292-7405 TTY: 651-266-6378

"Saint Paul Parks and Recreation- Creating Community Through People, Parks and Programs"

March 26, 2007

Mr. Glen Skovholt, Chair Metropolitan Parks and Open Space Commission 390 N. Robert St. St. Paul, MN 55101 Re: 2008-2013 Regional Parks CIP Structure

Dear Chair Skovholt;

The City of Saint Paul has long been a staunch supporter, proponent and operator of metropolitan regional parks. Saint Paul had regional parks for many years before the establishment of the Metropolitan Parks and Open Space Commission. Our commitment remains the same. As are all of the ten implementing agencies, we are severely challenged in developing, operating and maintaining ever expanding and increasingly used regional parks. The issue of formulizing the way in which Metropolitan Council and State of Minnesota resources are divided is critical to the City of Saint Paul.

We believe very strongly that a heavy emphasis needs to be placed on usage. Usage is the overriding indicator of a successful metro park system. In Saint Paul, our regional parks serve millions of visitors that are non-tax paying local citizens. We believe that these usage numbers are a key factor in the support that the Metropolitan Parks and Open Space System receives from the State of Minnesota; and therefore, we believe that usage must be reflected in any re-formulization.

We believe that Option # 2, which weights the population of each park agency by 60% and weights the amount of non-local visits by 40%, best captures both the intent and the reality of the Metropolitan Parks and Open Space System. We believe it is important to note that the City of Saint Paul has made a considerable investment in both acquisition and development resources while carrying a significant load in non-local usage operating costs. Also, the issue of a disproportionate amount of non taxable property in the City of St. Paul adds to the need for funding through other sources.

Sincerely,

Bob Bierscheid, CPRP Director

Mayor Chris Coleman
 Council President Kathy Lantry
 Parks and Recreation Commission Chair, Carrie Wasley



# SCOTT COUNTY COMMUNITY DEVELOPMENT

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Mark Themig Parks Program Manager mthemig@co.scott.mn.us

April 2, 2007

Metropolitan Parks and Open Space Commission c/o Mr. Arne Stefferud Metropolitan Council 390 North Robert Street St. Paul, Minnesota 55101

Subject: Regional Park Agency CIP Allocation

Dear Chair Skovholt, Commissioners, and Mr. Stefferud,

On behalf of Scott County, I would like to thank you for the opportunity to provide feedback on potential changes to the CIP allocation formula.

As a newer implementing agency, some may perceive Scott County's funding needs different than the needs of developed agencies. While this may be true in terms of what our allocation would fund, our basic needs are similar: to build and maintain a system of regional parks, trails and park reserves that serve not only the residents within our respective jurisdiction, but those throughout the metropolitan region.

We have reviewed the six allocation options proposed in Mr. Stefferud's staff report to the Commission dated March 13, 2007. It is our opinion that Option 1 "Per Capita Share" best meets the principals of creating a clear and transparent process while supporting the development or redevelopment needs of each agency in the system. Our opinion is based on three key points:

1. Per Capita Share is Equitable for All Agencies
The per capita method is the most equitable for all implementing agencies. It balances the
development/redevelopment needs of developed agencies with the acquisition/development
needs of newer agencies by providing each agency with a proportionate share of the
available funding. In Scott County's case, the equity of this formula is especially important
having received no funding from the 2006-2007 CIP allocation.

The argument to factor in visitor counts to address redevelopment needs created by non-local visits is a legitimate point. However, growing implementing agencies can counter that developing a system that will serve future populations (some of whom may currently reside in developed agency jurisdictions) is as important as redeveloping existing systems. Therefore, the per capita method is fair to both developed and developing agencies by providing a proportionate share of available funding.

Agencies with High Visitation Benefit Through a Greater Share of O&M Funding
While we acknowledge that operations and maintenance funding does not meet current
needs, implementing agencies with higher visitation numbers receive a greater proportion of

An Equal Opportunity/Safety Aware Employer

operations and maintenance funding. Newer and developing agencies generally have lower visitation numbers, and therefore receive less O&M funding.

3. Developed Implementing Agencies Have Benefited from Past Allocation Formulas and Other Funding Sources

Developed agencies have benefited over the years from the initial CIP formula that required 80% of funding to be spent on acquisition, as well as the current allocation formula where the amount an agency received in the past is factored into the next allocation. These opportunities have allowed developed agencies to acquire and build wonderful systems that serve the region. The per capita approach will help newer agencies establish their systems by ensuring each gets a proportionate share of funding.

We also agree with comments made by other agencies that the Acquisition Opportunity Fund should remain separate from the general CIP allocation. This fund is available to any agency based on the opportunity, and shouldn't be tied to a specific formula. In addition, there were funding sources previously available for acquisition (such as LAWCON grants) that are not available now. We feel that the Acquisition Opportunity Fund should compliment CIP funding.

Finally, we acknowledge that the underlying issue is the lack of funding needed to acquire, develop, and maintain the regional park system. Therefore, we support looking at other funding mechanisms, including the proposed regional park foundation.

Thank you again for the opportunity to provide feedback on the proposed CIP allocation options. If you have any questions, you can reach either Patricia Freeman at 952-496-8344 or me at 952-292-9233.

Sincerely,

Mark Themig

Parks Program Manager

cc: Scott County Parks Advisory Commission

Michael Sobota, Community Development Director Patricia Freeman, Senior Natural Resource Specialist