

To: St. Paul City Council and Mayor Chris Coleman

From: Friends of the Parks and Trails of St. Paul and Ramsey County  
Shirley Erstad, Executive Director

May 16, 2016

RE: RES PH 16-147 Hearing on MRCCA Rules  
City Council, May 18, 5:30pm

For 40 years, the Department of Natural Resources (DNR) has had rules in place to protect the natural resources in the Mississippi River Corridor Critical Area (MRCCA) that runs roughly from Anoka to Hastings. Those rules are being revised.

That same area is also the Mississippi National River and Recreation Area (MNRRA), a National Park. It became a National Park because our U.S. Senator, Dave Durenberger, and St. Paul native and U.S. Congressman Bruce Vento, introduced legislation and gathered bi-partisan support in 1988 to protect it for us and for future generations.

At the hearing, the Council is considering a resolution that would weaken protections in St. Paul. Currently, along the river bluff, the MRCCA rules say most buildings outside the downtown core can only be 40' high unless a special variance is granted. With the proposal, buildings of 65' would be the standard, with the potential to go even higher with a conditional use permit.

The resolution argues against adopted city policy. For instance, development is not allowed on slopes of 18% or greater. If the resolution is passed, it includes reference to language arguing against that very policy.

Public input hasn't been taken on the final draft of the rules. There was one public hearing before the Planning and Economic Development's Planning Commission in 2014, but that was on an earlier draft of the rules.

The DNR process does not require the city to submit an official position. If the city goes on record with an official position, when its time for St. Paul to examine their ordinances to either bring them into compliance or make them more protective (the more protective provision would apply, because the rules are overlay districts) it will be challenging to have an objective conversation. The rules deal with building heights, setbacks from the water or the bluff, scenic views, development on slopes, historic and cultural areas of significance, vegetation management, and other issues. These are important topics that deserve to have meaningful and thoughtful consideration.

Other things to ponder:

1. **Equity.** The MRCCA is a narrow ribbon of land along both sides of the river. Consider that the tree canopy is roughly 40' high. If buildings are allowed at heights of 65+ feet, those will be some nice views for the rich few that can afford them. It will decrease the property values of the folks already there, however, because they'd lose the natural view and be looking at tall buildings. It would also substantially impact scenic views for the majority of people who enjoy the river corridor but can't afford to live in luxury housing.
2. **Equity again.** The City Council recently committed taxpayers to paying 18.4 million dollars for infrastructure around the proposed soccer stadium at University and Snelling. The promise was that the stadium would generate other development. Consider this: if you're a developer and want to make an investment, where would you stand to make the most money with the least risk? Would it be in the part of the city where questions remain about when/if/how other development will happen or the part of the city that is allowing development in a scenic area that is some of the most valuable real estate in the state of Minnesota? Opening up the Critical Area for development would drain investment away from other parts of our city that deserve to be invested in, too.
3. **Density.** We need to design and build for density but where it makes sense. For example, we just invested a huge sum of money in the Green Line transit project, with this very issue in mind. Why would we now want to put dense housing in a small strip of land on the bluff when its not near transit? Additionally, with more dense development also comes more infrastructure costs, so its not an entirely net gain to develop an area.
4. **Eco Tourism.** There is money to be made in keeping things natural, too. This summer, the French America River Cruise line is coming to St. Paul and Viking River Cruises has indicated they'll be adding us to their ports of call. Canoeists, kayakers, paddle boarders, rowers, boaters, bikers, hikers, walkers, birders, tourists, and others come to enjoy our river corridor. Eco Tourism is a growing market and not one we should overlook.
5. **Climate Change, Water Quality, Habitat and Wildlife Corridors.** Cities around the world are looking at ways to mitigate the effects of climate change. They're trying to reclaim what St. Paul is considering developing. For instance, the proposal is seeking development on slopes if they don't face the river. But, developing on slopes, whether or not they face the river, impacts water quality, habitat for pollinators and other animals, and connections for wildlife to move around. Just because we CAN develop almost anywhere we want because we have the skills to do it doesn't mean we SHOULD.

6. **Heritage.** The expressed purpose of these rules includes protecting areas of historical and cultural significance. The confluence of the Mississippi and Minnesota Rivers is considered sacred to Native Americans.
  
7. **Legacy.** Mayor Coleman said in a speech on May 12 after a week of forums and workshops based on the premise that **we need to consider equity when we design and grow our city**, "When St. Paul turned its back on the river, it was bad for the entire city. When we took care of that natural resource, it made our entire city more vibrant". We enjoy the high quality of our river environment today, the wildlife, the scenic views, the quiet out on the water where you can't believe you're in the middle of a city, because of the vision of those who came before us. That is their legacy to us. What will be our legacy to the generations that come after us?

Thank you for taking these comments into consideration.