

From: [Wendy Neurer](#)
To: [CouncilHearing \(CI-StPaul\)](#); [#CI-StPaul_Council](#); [#CI-StPaul_Ward3](#); [#CI-StPaul_Ward1](#); [#CI-StPaul_Ward4](#); [#CI-StPaul_Ward7](#); [#CI-StPaul_Ward2](#)
Cc: [Patricia Merwin](#); [JOSEPH P. COLLINS Owner](#); [Mary Ann Berglund](#); [Mat Broph](#); [Thomas Romens](#); [Bill McMahon](#); [Jane Prince](#); [Kathy Cumming](#); [Chris Rosenthal](#); [Barb klussendorf](#); [Elizabeth Ankeny](#); [Stefani Brand](#); [Maira Keane](#); [Beverly Moore](#); [William Lomax](#); [Char Mason](#); [Laura Angell](#); [Sarah Stevenson Stevenson](#); [msshelby29@hotmail.com](#); [RitaLuca1](#); [Kate Knapp](#); [Cindy Lorah](#); [Ralph Moore](#); [Jon Brand](#); [Scott Schickli](#); [Sharell Benson](#); [Liesl Taylor](#); [Daniel Becker](#); [Chandler Taylor](#); [Pat Tidmarsh](#); [Gary Reetz](#); [Sara Romanski](#); [Michelle Kvasnik](#); [Sara Erickson](#); [Tammy Reno](#); [Beth Chiang](#); [Katy Schultz](#); [cringer@aol.com](#); [Karolyn J. Geyen](#); [Nina Broadhurst](#); [Michael Foldes](#); [Gregg Angell](#); [Deborah KATZ](#); [Dave Degree](#); [Colleen Holm](#); [Allan Torstenson](#); [Ron Bennett](#); [Bill Kenney](#); [Chris Biermann](#); [Laura Zelle](#); [Jason Beth](#); [Barbara and Charles Kurtz](#); [Barb and Roger Jobin](#); [Iain Dove McAfee](#); [Mary Dienhart](#); [Dave Pinto](#); [Davis Gooch](#); [Eric Whalen](#); [Eleanor Rudin](#); [Winston Kaehler](#); [Judy Hoffman](#); [Waverley Booth](#); [Judy Roe](#); [Kurt Klussendorf](#); [susanerossi.01@gmail.com](#); [Melia Smith](#); [Tim Moorhead](#); [TOM DIMOND](#); [Riley Conway](#); [Charlotte Tjaden](#); [Stephen Nicholson](#)
Subject: Passing MRCCA now
Date: Tuesday, November 11, 2025 11:38:23 AM

You don't often get email from wendyn02@aol.com. [Learn why this is important](#)

The Mississippi River Corridor Critical Area (MRCCA) ordinance should provide strong riverfront rules for St. Paul that are both good for the river and good for communities. As a long term resident of this city, I urge you to support the passage of a St. Paul MRCCA ordinance that includes clear standards for building height and exceptions.

This is vital to sustain the integrity for St. Paul to respect the national treasure of the Mississippi River and its belonging to the Native American people. City government does not own this land, we are all stewards and need to protect it from becoming a sight for over development .

Consider the Paster development plans on the Mississippi River Boulevard and Highland Parkway. They want to pursue the development of a 96 luxury apartment building of 49 feet tall, dog run, infinity pool and barbecue pit. This needs to be stopped NOW. What a sign of greed for the city of St. Paul politicians . The neighborhoods here and in Minneapolis are opposed to this offensive building located right on this beautiful River Corridor that used to be a beautiful church built 70 years ago an affordable modest apartment building.

Vote now to pass MRCCA and stop all building on this River Corridor that does not meet the MRCCA ordinance. This needs to be passed on November 19th.

Sincerely,
Wendy Neurer
711 South Woodlawn Avenue

From: [Rita Lucia](#)
To: [Carol Stearns \(St. Paul\)](#)
Subject: Passing MRCCA vote
Date: Tuesday, November 11, 2025 12:58:26 PM

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The Mississippi River Corridor Critical Area (MRCCA) ordinance should provide strong riverfront rules for St. Paul that are both good for the river and good for communities. As a long term resident of this city, I urge you to support the passage of a St. Paul MRCCA ordinance that includes clear standards for building height and exceptions.

This is vital to sustain the integrity for St. Paul to respect the national treasure of the Mississippi River and its belonging to the Native American people. City government does not own this land, we are all stewards and need to protect it from becoming a sight for over development.

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Vote now to pass MRCCA and stop all building on this River Corridor that does not meet the MRCCA ordinance. This needs to be passed on November 19th.

Sincerely,
Rita Johnson
1630 Highland Parkway
Saint Paul, MN 55116 as



The Mis
support

This is v





West 7th/Fort Road Federation

395 Superior Street

Saint Paul, MN 55102

651.298.5599

www.FortRoadFederation.org

Sent via email: contact-council@ci.stpaul.mn.us

November 12, 2025

Saint Paul City Council
15 W. Kellogg Boulevard
Saint Paul, MN 55102

**Re: St. Paul's proposed Mississippi River Corridor Critical Area (MRCCA)
ordinance Public Comment**

Dear Councilmembers,

Thank you for the opportunity to comment on the proposed Mississippi River Corridor Critical Area (MRCCA) ordinance. The West 7th/Fort Road Federation represents residents, businesses, and organizations in Saint Paul's West 7th neighborhood, stretching from the bluffs to the river and encompassing key sections of the corridor.

The MRCCA ordinance plays a vital role in shaping how our community interacts with the river and in ensuring that future development protects the character, ecology, and accessibility of this defining feature of Saint Paul.

The updated draft provides clearer guidance for both residents and developers, setting a solid foundation for thoughtful riverfront planning. However, the Federation joins other local partners in urging the City Council to strengthen the ordinance in a key area:

Reinstate the bird-safe glass requirement.

The Mississippi River flyway is one of the most important migratory routes in North America. Given the significant bird mortality associated with glass collisions, incorporating a bird-safe glass standard in the MRCCA ordinance is a commonsense measure that aligns with Minnesota's B3 Sustainable Building Guidelines and with community values around environmental stewardship. This modest design requirement, previously included in the 2023 draft, adds minimal cost while offering meaningful ecological benefit.

There is a suggestion to initiate a separate study about bird-friendly glass instead. We're concerned that this study may not come to fruition, or lead to action. We ask the Council to restore the bird-safe glass language proposed in the 2023 MRCCA draft ordinance.

The Fort Road Federation coordinates participation in advocacy and planning and builds community connections for the residents, businesses, and nonprofit organizations of the West 7th neighborhood so that it is a place where people want to live, work, and play.

In adopting this ordinance, the City has an opportunity to reaffirm Saint Paul's commitment to the Mississippi River as both a natural resource and a public commons. We encourage the Council to adopt the strongest possible version of the MRCCA ordinance—one that reflects the values of environmental responsibility, transparency, and community benefit.

Thank you for your time and consideration of these comments, and for your ongoing work to protect and celebrate our city's defining natural feature.

Sincerely,

A handwritten signature in black ink, appearing to read 'Julia McColley', with a stylized, cursive script.

Julia McColley
Executive Director
West 7th/Fort Road Federation

From: Jenna Sadjadi
To: dkorthofstanton@everyactionadvocacy.com
Cc: [*CI-StPaul_Contact-Council](#)
Subject: RE: I am writing to you today regarding a very important issue
Date: Wednesday, November 12, 2025 12:48:14 PM

Hi Deborah -- Thank you for contacting the Ward 2 office regarding Ord 25-72, "Amending Chapters 60,61,68, and 72 of the Legislative Code pertaining to the Mississippi River Corridor Critical Area and the Flood Plain Management Overlay Districts" (View the full text at <https://stpaul.legistar.com/LegislationDetail.aspx?ID=7717429&GUID=AE377616-2973-42E4-90AD-851B60D17A99>). This item will have it's first reading at today's 3:30pm City Council meeting.

Your comment will be shared with Council President Noecker and added to the public record.

Jenna Sadjadi (she/they)
Executive Assistant to Council President Noecker
Saint Paul City Council - Ward 2
15 W Kellogg Blvd, Room 310B
Saint Paul, MN 55102
651-266-8620 | www.stpaul.gov/ward2

-----Original Message-----

From: dkorthofstanton@everyactionadvocacy.com <dkorthofstanton@everyactionadvocacy.com>
Sent: Wednesday, October 29, 2025 11:03 AM
To: [#CI-StPaul_Ward2](#) <Ward2@ci.stpaul.mn.us>
Subject: I am writing to you today regarding a very important issue

[You don't often get email from dkorthofstanton@everyactionadvocacy.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Think Before You Click: This email originated outside our organization.

Dear Council President Rebecca Noecker,

The Mississippi River Corridor Critical Area (MRCCA) ordinance should provide strong riverfront rules for St. Paul that are both good for the river and good for communities. As your constituent, I urge you to support the passage of a St. Paul MRCCA ordinance that includes bird-safe building requirements and clearer standards for building height and exceptions. This is important to me because birds are incredible animals putting humans to shame when it comes to survival strategies but human animals have little regard for them. Requiring window glass which protects birds from running into windows is the least we can do. We can always talk about lighting during migration times —lighting and glass—make MN Nice really mean something.

Sincerely,
Deborah Korthof-Stanton
Saint Paul, MN 55107-2157

From: [Tina Gassman](#)
To: [#CI-StPaul_Council](#)
Cc: [Bill Huepenbecker, Minnesota Sports & Entertainment](#); [Kori DeJong, Wellington Management](#); [Jill Hocking](#)
Subject: MRCCA Ordinance 25-72: Request to Exempt the Urban Core from New Height Restrictions
Date: Thursday, November 13, 2025 2:42:30 PM
Attachments: [image001.png](#)

Some people who received this message don't often get email from tina.gassman@bomastpaul.org. [Learn why this is important](#)

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Greater Saint Paul Building Owners & Managers Association

OSBORN370 • 370 WABASHA STREET NORTH, SUITE 690
SAINT PAUL, MINNESOTA 55102 • PHONE: 651.291.8888

November 13, 2025

Council President Rebecca Noecker
Councilmember Anika Bowie
Councilmember Saura Jost
Councilmember Molly Coleman
Council Vice President Hwa Jeong Kim
Councilmember Nelsie Yang
Councilmember Cheniqua Johnson

Re: MRCCA Ordinance 25-72: Request to Exempt the Urban Core from New Height Restrictions

Dear City Councilmembers,

On behalf of Greater Saint Paul BOMA and the commercial property owners and managers we represent, I urge you to exempt the Urban Core from the height restrictions proposed in the Mississippi River Corridor Critical Area (MRCCA) ordinance. Downtown Saint Paul is at a turning point, focused on revitalization and the importance of reconnecting to the riverfront. Adopting the MRCCA ordinance in its current form risks stalling that progress.

Greater Saint Paul BOMA supports responsible, sustainable growth that protects the river while strengthening downtown, the economic and cultural heart of our capital city. While we support the intent of the MRCCA, the proposed restrictions create further barriers to investment our city needs to thrive. Continued development and reinvestment in downtown are essential to restoring vitality, attracting residents, and growing our city's tax base. Transformative projects like RiversEdge are critical to achieving these goals.

We respectfully urge the Council to exempt the Urban Core from new height restrictions to ensure important projects like RiversEdge and future downtown developments can move forward.

Thank you for your leadership and for your continued partnership in shaping Saint Paul's future.

Sincerely,

Tina Gassman
President, Greater Saint Paul BOMA

2025-2026 OFFICERS

Bill Huepenbecker, *Chairperson* • Kori De Jong, *Vice Chairperson* • Jill Hocking, *Secretary/Treasurer*

DIRECTORS

Joe Holzman • Heide Kempf-Schwarze • Robert T. Loftus • Julie R. Perteet • Crystal L. Pingel • Patrick Scullin
Tina Gassman, *President*

From: [Jenna Hawkes](#)
To: [CouncilHearing \(CI-StPaul\)](#)
Subject: MRCCA: Signed petition for bird-safe glass
Date: Friday, November 14, 2025 3:02:16 PM
Attachments: [Saint Paul MRCCA Petition .pdf](#)

You don't often get email from jhawkes@fmr.org. [Learn why this is important](#)

Good afternoon,

In preparation for the Council's upcoming deliberations on the Mississippi River Corridor Critical Area (MRCCA) ordinance, I've attached a petition signed by 262 St. Paul residents advocating to restore a bird-safe glass requirement in the ordinance.

Best regards,
Jenna Hawkes

--

Jenna Hawkes (she/her)
Grassroots Organizing Coordinator
jhawkes@fmr.org | 651.477.0922 (call)



Friends of the Mississippi River

106 W. Water St., Ste. 600
St. Paul MN 55107-2032

FMR.org

Support Our River Campaign:

fmr.org/our-river-campaign



Petition:

“Passing a strong Mississippi River Corridor Critical Area (MRCCA) ordinance is integral to riverfront protection and future development. I urge you to support the passage of St. Paul's MRCCA ordinance that includes bird safe building requirements and clear standards for building heights and exceptions.”

Signed by 262 St. Paul residents

Ada	B	Saint Paul	55104
Craig	Adams	Saint Paul	55106
Cindy	Adamson	Saint Paul	55116
Joe	Adcock	Saint Paul	55108
Carlos	Alarcon Avila	Saint Paul	55107
Karen	Alexander	Saint Paul	55104
Deb	Alper	Saint Paul	55105
Lucille	Altemus	Saint Paul	55106
Laura	Angell	Saint Paul	55116
Scott	Armstrong	Saint Paul	55108
Robin	B	Saint Paul	55108
Sara	Barsel	Saint Paul	55113
Bob	Bartlett	Saint Paul	55110
Dan	Becker	Saint Paul	55116
Theresa	Beckhusen	Saint Paul	55104
Sara	Beckstrand	Saint Paul	55116
Carey	Bell	Saint Paul	55110
Jay	Benanav	Saint Paul	55104
Faye	Berton	Saint Paul	55104
Monica	Bierma	Saint Paul	55101
Lois	Bjorlie	Saint Paul	55102
Brent	Boehner	Saint Paul	55107
Colleen	Bollom	Saint Paul	55105
Martha	Boyd	Saint Paul	55119
Stefani	Brand	Saint Paul	55116
Clifton	Brittain	Saint Paul	55105
Linda	Brooks	Saint Paul	55101
Ada	Brown	Saint Paul	55108
Debbie	Brown	Saint Paul	55105
Deborah	Brown	Saint Paul	55105
Judith	Brown	Saint Paul	55102
Terrance	Brueck	Saint Paul	55105
Arianna	Bryant	Saint Paul	55106
Paul	Busch	Saint Paul	55104
Cliff	Carey	Saint Paul	55106
Kelsey	Carignan	Saint Paul	55108
Sandy	Carlin	Saint Paul	55104
Elizabeth	Carls	Saint Paul	55108
Daren	Carlson	Saint Paul	55118
Lydia	Caros	Saint Paul	55116

Alex	Carroll	Saint Paul	55126
Michael	Cassidy	Saint Paul	55102
Beth	Chiang	Saint Paul	55116
Whitney	Clark	Saint Paul	55105
Kate	Clover	Saint Paul	55101
Joan	Cochran	Saint Paul	55105
Julie	Comine	Saint Paul	55105
Mary	Conlin-Warner	Saint Paul	55116
Kathleen			
H.	Corley	Saint Paul	55102
Stewart	Corn	Saint Paul	55105
Chris	Corrigan	Saint Paul	55113
Sam	Courtright	Saint Paul	55116
Craig	Cox	Saint Paul	55105
Robert	Craft	Saint Paul	55107
Matthew	Crellin	Saint Paul	55105
Rashon	Cryer	Saint Paul	55106
Kathy	Cumming	Saint Paul	55116
Michael	Custard	Saint Paul	55101
Perrine	Dailey	Saint Paul	55116
Luke	Darger	Saint Paul	55116
Andy	Dawkins	Saint Paul	55104
Sara	DeKok	Saint Paul	55105
Maria	DeLaundreau	Saint Paul	55104
David	DeLong	Saint Paul	55108
Beatrice	DeVereHunt Schneider	Saint Paul	55105
Britta	Dosland	Saint Paul	55116
Martha	Douglas	Saint Paul	55102
Iain	Dove McAfee	Saint Paul	55104
Joe	Downes	Saint Paul	55105
Meg	Duhr	Saint Paul	55102
Virginia	Dunivan	Saint Paul	55105
Julia A.	Earl	Saint Paul	55105
Catherine	Early	Saint Paul	55117
Kari	Egeberg	Saint Paul	55110
Sarah	Emrick	Saint Paul	55116
Elaine	Evans	Saint Paul	55104
K.	Feilmeyer	Saint Paul	55105
Rich	Femling	Saint Paul	55113
Gary	Fifield	Saint Paul	55105

Adam	Flett	Saint Paul	55108
Philip	Friedlund	Saint Paul	55102
Susan	Fuerstenberg	Saint Paul	55102
Mary	Furth	Saint Paul	55105
Patricia	Gagne	Saint Paul	55116
Paul	Garding	Saint Paul	55106
Karen	Gasche	Saint Paul	55108
Carole	Gernes	Saint Paul	55109
Gita	Ghei	Saint Paul	55103
Mark	Gilbert	Saint Paul	55105
kathy	glover	Saint Paul	55104
Katherine	Goffin	Saint Paul	55106
Peter	Gove	Saint Paul	55110
Vincent	Graziano	Saint Paul	55104
Coleen	Gregor	Saint Paul	55105
Arjun	Guneratne	Saint Paul	55116
Meredith	Gunlicks-Stoessel	Saint Paul	55108
Gayl	Gustafson	Saint Paul	55106
Carla	Hagen	Saint Paul	55105
Nils	Halker	Saint Paul	55117
Karina	Hanson	Saint Paul	55108
Kathy	Harriman	Saint Paul	55116
Louisa	Harstad	Saint Paul	55104
Jenna	Hawkes	Saint Paul	55105
Terry	Hawkins	Saint Paul	55119
Sarah	Hayes	Saint Paul	55117
Anne	Henly	Saint Paul	55104
Liz	Henrich	Saint Paul	55105
Tom	Hiendlmayr	Saint Paul	55116
Meg	Hirman	Saint Paul	55126
Margaret	Hogan	Saint Paul	55105
Jeanine	Holden	Saint Paul	55105
Colleen	Holm	Saint Paul	55116
Felix	Hoover	Saint Paul	55112
Ginny	Housum	Saint Paul	55105
Elinor	Jackson	Saint Paul	55126
Steve	Janusz	Saint Paul	55116
Allison	Jensen	Saint Paul	55113
Kara	Jeter	Saint Paul	55104
Catherine	Johnson	Saint Paul	55118

Frank	Jossi	Saint Paul	55116
Winston	Kaehler	Saint Paul	55105
Deborah	Katz	Saint Paul	55116
Jill	Keen	Saint Paul	55104
Maureen	Kenney	Saint Paul	55104
Devanshi	Khokhani	Saint Paul	55125
Donald	Kist	Saint Paul	55105
Barbara	Klussendorf	Saint Paul	55116
Kurt	Klussendorf	Saint Paul	55116
Leah	Kodner	Saint Paul	55117
Steve	Komula	Saint Paul	55107
Lee	Korthof	Saint Paul	55107
Deborah	Korthof-Stanton	Saint Paul	55107
Daniel	Krivit	Saint Paul	55116
Michelle	Kunz	Saint Paul	55105
R Michael	Lacy	Saint Paul	55120
Susan	Lamoureux	Saint Paul	55105
Jeanne	Landkamer	Saint Paul	55104
Wendy	Lane	Saint Paul	55127
Susan	Lauries	Saint Paul	55120
Elisa	Lee	Saint Paul	55116
Erica	Lee	Saint Paul	55116
Peter	Leete	Saint Paul	55114
Julia	Leone	Saint Paul	55117
Fran	Lesicko	Saint Paul	55105
Jeanne	Levitt	Saint Paul	55105
Lori	Lifto	Saint Paul	55101
William	Lomax	Saint Paul	55116
Cindy	Lorah	Saint Paul	55116
Sara	Lovat	Saint Paul	55108
Anne	Lowe	Saint Paul	55105
Joyce	Lyon	Saint Paul	55108
Amy	Maas	Saint Paul	55123
Marsha	Macey	Saint Paul	55105
Mark	MacGregor	Saint Paul	55102
Michelle	MacGregor	Saint Paul	55102
Elan	Majkrzak	Saint Paul	55116
Anne	Maley	Saint Paul	55116
Jenny	Markert	Saint Paul	55118
Judith	Marshall	Saint Paul	55104

Todd	Marshall	Saint Paul	55104
Char	Mason	Saint Paul	55116
Carol	McCarty	Saint Paul	55116
Julia	McColley	Saint Paul	55102
Barbara	McEiver	Saint Paul	55105
Cynthia	McKeen	Saint Paul	55102
Barbara	McKernan	Saint Paul	55116
Lori	McLaren	Saint Paul	55107
Bill	McMahon	Saint Paul	55116
William	McMahon	Saint Paul	55116
Jennifer	McPherson	Saint Paul	55106
Debbie	Meister	Saint Paul	55104
Patricia	Merwin	Saint Paul	55116
Hokan	Miller	Saint Paul	55107
Penny	Miller	Saint Paul	55107
Kathryn	Mitchell	Saint Paul	55105
Camille	Morse Nicholson	Saint Paul	55107
Paul	Moss	Saint Paul	55110
Johanna	Munns	Saint Paul	55105
Sarah	Nelson	Saint Paul	55113
Mark	Neuman-Scott	Saint Paul	55101
Wendy	Neurer	Saint Paul	55116
Sandra	Newman	Saint Paul	55112
Sally	Nichols	Saint Paul	55124
Scot	Nortrom	Saint Paul	55114
Kathryn	Nuernberger	Saint Paul	55104
Jenn	P	Saint Paul	55116
Sarah	P	Saint Paul	55116
Aubre	Parsons	Saint Paul	55117
Joan	Pasiuk	Saint Paul	55105
Judy	Pearson	Saint Paul	55112
James	Peterson	Saint Paul	55113
Karen	Peterson	Saint Paul	55116
Jennifer	Pierson	Saint Paul	55116
Danielle	Porter Lucero	Saint Paul	55105
Cora	Preston	Saint Paul	55104
Susan	Price	Saint Paul	55104
Jane	Prince	Saint Paul	55106
Daniel	Pryor	Saint Paul	55113
Tammy	Reno	Saint Paul	55116

Jean	Rivard	Saint Paul	55106
Audra	Robbins	Saint Paul	55113
Kris	Robison	Saint Paul	55104
Roberto	Rodriguez	Saint Paul	55119
Jeanne	Ronayne	Saint Paul	55118
Jessica	Rootes	Saint Paul	55106
Elaine	Rosner	Saint Paul	55119
Patricia	Ryan	Saint Paul	55122
Mary	Saul	Saint Paul	55116
Ann	Schley	Saint Paul	55119
linda	schloff	Saint Paul	55116
Beatrice	Schneider	Saint Paul	55105
Greg	Schneider	Saint Paul	55105
James	Schoettler	Saint Paul	55116
Kelly	Schwab	Saint Paul	55103
Bobbie	Scott	Saint Paul	55119
Julian	Sellers	Saint Paul	55105
Kathy	Sidles	Saint Paul	55106
Kailey	Smith	Saint Paul	55116
John	Soucheray	Saint Paul	55126
Laurie	Sovell	Saint Paul	55107
Bob	Spaulding	Saint Paul	55103
Elizabeth	Spaulding	Saint Paul	55108
Erin	Spry	Saint Paul	55104
Nan	Stevenson	Saint Paul	55126
Sarah	Stevenson	Saint Paul	55116
Mark	Stewart	Saint Paul	55105
Carol	Stoddart	Saint Paul	55116
Phlaurel	Strand-Crawford	Saint Paul	55107
Sam	Streukens	Saint Paul	55116
Sammy	Strootman	Saint Paul	55104
Gabriela	Sweet	Saint Paul	55102
Liesl	Taylor	Saint Paul	55116
Kristine	Thompson	Saint Paul	55116
Michael	Thomsen	Saint Paul	55105
Joe	Tillotson	Saint Paul	55102
Joan	Toohey	Saint Paul	55105
Kathleen	Tuma	Saint Paul	55105
Timothy	Twohy	Saint Paul	55104
Michele	Vaillancourt	Saint Paul	55105

Darcie	Vandegrift	Saint Paul	55106
Mike	Vant	Saint Paul	55126
Dorothy	Vawter	Saint Paul	55127
John	Vegter	Saint Paul	55124
Amy	Verhoeven	Saint Paul	55104
Heidi	Wachter	Saint Paul	55104
Stephen	Walker	Saint Paul	55116
Anna	Waugh	Saint Paul	55106
Sarah	Wein	Saint Paul	55108
Cynthia	Werner	Saint Paul	55101
Leah	Weston	Saint Paul	55108
Nancy	White	Saint Paul	55116
Gayle	Whitney	Saint Paul	55107
Mary	Willis	Saint Paul	55102
Mike	Willis	Saint Paul	55104
Susan	Willis	Saint Paul	55104
tiffany	wortman	Saint Paul	55105
Alisha	Wruck	Saint Paul	55105
Jean	Wulterkens	Saint Paul	55119
Bryan	Wyberg	Saint Paul	55113
David	Zarkower	Saint Paul	55104
Therese	Zemlin	Saint Paul	55117
Catherine	Zimmer	Saint Paul	55104



November 17, 2025

St Paul City Council
15 W Kellogg Blvd
Saint Paul, Minnesota 55102

Re: Public Comment on MRCCA Zoning Code Amendments

Dear Honorable Members of the Saint Paul City Council,

On behalf of Ryan Companies, I am writing to comment on the proposed Mississippi River Corridor Critical Area (MRCCA) zoning code amendments. We support the City's efforts to comply with state MRCCA rules and appreciate the opportunity to provide our perspective as a long-standing partner in Saint Paul's development.

We understand there is discussion about requiring bird-safe glass for projects within the overlay. This requirement would add significant costs to any project for a questionable practical benefit, especially since most development in the MRCCA is residential. A typical multifamily building's exterior is only 25-30% glass, much of which is broken up by screens and other elements that already limit potential bird strikes. Adding this costly mandate creates another barrier to housing production at all income levels. On a project like Highland Bridge, which has already committed to extensive City requirements, such an addition is impractical and discourages investment.

Clear, predictable, and cost-effective regulations are essential to fostering development and achieving the MRCCA's goal of balancing environmental protection with appropriate urban growth. We urge the Council to consider the cost-benefit of new regulations in the context of our shared goals for housing and economic vitality.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Maureen Michalski".

Maureen Michalski
Regional Senior Vice President, Development

Ryan Companies US, Inc.
533 South Third Street, Suite 100
Minneapolis, MN 55415

p: 612-492-4000
ryancompanies.com

Equal Opportunity Employer

From: [Rebecca Noecker](#)
To: [Ortega, Rafael E](#)
Cc: [Collins, Kari E](#); [Becker, Ling](#); [Greg Weiner](#)
Subject: RE: MRCCA Request
Date: Monday, November 17, 2025 12:58:56 PM

Dear Commissioner,

Thank you very much for your testimony and I apologize for the delayed response.

I share your goal of downtown development and want to see the RiversEdge project succeed. I will make sure your message is added to the public record and I will be taking your perspective into account as I listen to the public testimony this week and consider possible amendments to the MRCCA ordinance.

Best,
Rebecca

Rebecca Noecker | Saint Paul City Councilmember, Ward 2

15 West Kellogg Blvd – Suite 310B | Saint Paul, MN 55102
651.266.8622 | rebecca.noecker@ci.stpaul.mn.us

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From: Ortega, Rafael E <Rafael.E.Ortega@CO.RAMSEY.MN.US>
Sent: Wednesday, November 5, 2025 12:52 PM
To: Rebecca Noecker <Rebecca.Noecker@ci.stpaul.mn.us>
Cc: Collins, Kari E <kari.collins@co.ramsey.mn.us>; Becker, Ling <Ling.Becker@CO.RAMSEY.MN.US>
Subject: MRCCA Request

Think Before You Click: This email originated **outside** our organization.

Dear Council President Noecker,

Over the last several decades, the Ramsey County Board of Commissioners has pursued projects and initiatives in downtown and along the riverfront in alignment with the shared goals of the City and County and many others. This includes the RiversEdge project. When accomplished, the public-private partnership that is RiversEdge will create more than eight (8) acres of new, publicly accessible access to the riverfront as well as unlock nearly a billion dollars of private investment. We have actively tracked the progress of Mississippi River Corridor Critical Access (MRCCA) ordinance over the

years. We are compelled in this moment to share our position to fully impress upon you the implications of the as-written ordinance.

The proposed MCRRA ordinance would add unnecessary barriers to development in downtown Saint Paul at a time in which development activity that adds density for residents and business is desperately needed. The ordinance as written would severely hinder the County's ability to deliver the RiversEdge project and stifle our shared plans for the growth and revitalization of downtown. It includes a vertical height limit of one story above Kellogg Blvd. While I am passing along our position, the County is additionally preparing to provide official written testimony at the upcoming city council public hearing.

To protect the existing and future opportunities to revitalize downtown, the County is advocating for the Structure Height language similar to the language recommended by the by PED staff on September 10th,

It is impossible to overstate the level of complexity the current ordinance, creates for downtown developments such as RiversEdge.

Although Conditional Use Permits are available for additional height, the technical complexities involved – especially when accommodating the river's curve and the vision to connect downtown to the river – create an overly burdensome and unpredictable CUP process.

We do not believe Saint Paul can afford to add more layers of complexity to development along the river. We are committed to deeply enhancing access to the river by the people of Saint Paul on RiversEdge park and to bringing more housing, office and retail development and we need your help to do it.

I will be out of the office next week so if you have any questions please contact County Manager Ling Becker (Ling.Becker@RamseyCountyMN.gov) or Deputy County Manager Kari Collins (Kari.Collins@RamseyCountyMN.gov).

Sincerely,

County Board Chair Rafael E. Ortega

District 5
651-266-8361

15 West Kellogg Boulevard, Courtroom 220, St. Paul, MN 55102



[RamseyCountyMN.gov](https://www.RamseyCountyMN.gov) | [Facebook](#) | [Twitter](#) | [LinkedIn](#) | [e-Updates](#) | [Privacy notice](#)

November 19, 2025

Council President Rebecca Noecker
Councilmember Anika Bowie
Councilmember Saura Jost
Councilmember Molly Coleman

Council Vice President Hwa Jeong Kim
Councilmember Nelsie Yang
Councilmember Cheniqua Johnson

Re: MRCCA Ordinance 25-72 - Exempt the Urban Core from New Height Restrictions

On behalf of the 1,600+ members and affiliates of the St. Paul Area Chamber, I urge the City Council to exempt the Urban Core from height restrictions proposed in the Mississippi River Corridor Critical Area (MRCCA) ordinance. Exciting efforts are underway to revitalize downtown Saint Paul and reconnect the city to its riverfront. Passing the MRCCA ordinance in its current form would jeopardize that progress.

Continued development downtown, including along the riverfront, is required to restore vitality to our Urban Core. The recovery of downtown depends on catalytic projects like RiversEdge moving forward. While the MRCCA ordinance is well-intentioned, its current form introduces enough uncertainty to stall current and future investment.

The worst outcome for Saint Paul would be the collapse of the RiversEdge development and the chilling of future projects across the Urban Core. Downtown must grow if the City is to meet its goal of adding 20,000 new residents.

The DNR's model ordinance is already stronger than prior MRCCA regulations. Twenty-five other cities and townships within the MRCCA boundaries have adopted ordinances closely aligned with that model. Saint Paul would be an outlier if it adopted the current version that contradicts the DNR's intent for consistent land use planning along the 72-mile river corridor.

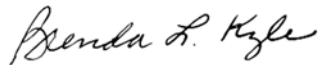
The Chamber is not advocating for unchecked development that diminishes the riverfront. Rather, we urge an approach that protects the river while allowing responsible growth downtown, especially when a \$788 million investment like RiversEdge and future downtown projects are at stake.



Significant vision, planning, and investment are already shaping downtown's future. We urge the Council to exempt the Urban Core from new height restrictions and choose an approach that supports downtown projects and the city's economic future.

Thank you for your time and attention. Please don't hesitate to reach out with any questions.

Sincerely,



B Kyle
President and CEO
St. Paul Area Chamber



From: [Noah Schneider](#)
To: [*CI-StPaul Contact-Council](#)
Subject: Support Balanced MRCCA Updates for Downtown
Date: Tuesday, November 18, 2025 10:10:55 AM

You don't often get email from noahlschneider@gmail.com. [Learn why this is important](#)

My name is Noah Schneider and I live at 808 Berry St, Apt 407, St Paul, MN 55114. I am writing to ask the City Council to amend the proposed updates to the Mississippi River Corridor Critical Area to be more in line with city staff's initial recommendations with regards to building height limits in the Urban Core.

I am concerned that the 35-foot base height limit and tiered setback system proposed in the Planning Commission's recommendation are overly complex and burdensome, and would require nearly any proposed development in the Urban Core area to apply for a Conditional Use Permit. This is at odds with the city's goals of creating a vibrant, thriving downtown and sustainable tax base.

Thank you for your commitment to the city.

Noah Schneider

From: [Jessa Anderson-Reitz](#)
To: [*CI-StPaul Contact-Council](#)
Subject: Proposed MCRRA height requirements
Date: Tuesday, November 18, 2025 9:19:49 AM

You don't often get email from jessarandersonr@gmail.com. [Learn why this is important](#)

Dear Councilmembers,

I am writing to ask you to amend the proposed updates to the Mississippi River Critical Corridor Area to be more in line with city staff's initial recommendations with regards to building height limits in the Urban Core and Urban Mixed zones. I am concerned that the 35-foot base height limit and tiered setback system proposed in the Planning Commission's recommendation are overly complex and burdensome, and would require nearly any proposed development in the Urban Core area to apply for a Conditional Use Permit.

Adopting these recommendations would severely undermine the City's ability to advance a key priority: creating a vibrant, thriving downtown and sustainable tax base, and exacerbate the growing property tax burden that homeowners and renters across the city are experiencing.

Thank you,

Jessa Anderson-Reitz (1423 Eleanor Avenue)

From: [Luke Hanson](#)
To: [*CI-StPaul Contact-Council](#)
Subject: Proposed MCRRA height requirements
Date: Tuesday, November 18, 2025 6:57:33 AM

Dear Councilmembers,

My name is Luke Hanson, and I live at 1423 Eleanor Avenue. I am writing to ask the City Council to amend the proposed updates to the Mississippi River Critical Corridor Area to be more in line with city staff's initial recommendations with regards to building height limits in the Urban Core and Urban Mixed zones.

I am concerned that the 35-foot base height limit and tiered setback system proposed in the Planning Commission's recommendation are overly complex and burdensome, and would require nearly any proposed development in the Urban Core area to apply for a Conditional Use Permit.

Adopting these recommendations would severely undermine the City's ability to advance a key priority: creating a vibrant, thriving downtown and sustainable tax base, and exacerbate the growing property tax burden that homeowners and renters across the city are experiencing.

Thank you,

Luke Hanson

From: [DonChookKnow](#)
To: [*CI-StPaul Contact-Council](#)
Subject: Mississippi River Critical Corridor Area Recommendations Vote
Date: Tuesday, November 18, 2025 1:47:59 AM

You don't often get email from donchooknow71@gmail.com. [Learn why this is important](#)

Hello St Paul City Council Members,

My name is Luke Staehnke and although I live in Woodbury, I work in downtown St Paul and genuinely support efforts to rejuvenate the city. I am writing to ask the City Council to amend the proposed updates to the Mississippi River Critical Corridor Area to be more in line with city staff's initial recommendations with regards to building height limits in the Urban Core/Urban Mixed areas. I am concerned that the 35-foot base height limit and tiered setback system proposed in the Planning Commission's recommendation are overly complex and burdensome, and would require nearly any proposed development in the Urban Core area to apply for a Conditional Use Permit. This is at odds with the city's goals of creating a vibrant, thriving downtown and sustainable tax base. Thank you for your commitment to the city.

Best Regards,

Luke J Staehnke

From: [jonathan.feldman](#)
To: [*CI-StPaul>Contact-Council](#)
Subject: No restrictive DT height limits
Date: Monday, November 17, 2025 9:46:47 PM

[You don't often get email from jonfeldman22@msn.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Hello Council members & staff,

My name is Jonathan Feldman and I live at 401 Sibley St Apt 302, 55101. I am writing to ask the City Council to amend the proposed updates to the Mississippi River Critical Corridor Area to be more in line with city staff's initial recommendations with regards to building height limits in the Urban Core/Urban Mixed areas. I am concerned that the 35-foot base height limit and tiered setback system proposed in the Planning Commission's recommendation are overly complex and burdensome, and would require nearly any proposed development in the Urban Core area to apply for a Conditional Use Permit. This is at odds with the city's goals of creating a vibrant, thriving downtown and sustainable tax base. Thank you for your commitment to the city.

From: [Daniel Waddell](#)
To: [*CI-StPaul Contact-Council](#)
Subject: Support Balanced MRCCA Updates for Downtown
Date: Tuesday, November 18, 2025 3:37:06 PM

You don't often get email from daniel.c.waddell@outlook.com. [Learn why this is important](#)

My name is Dan Waddell and I live at 1144 Edgcumbe Road, Saint Paul, Minnesota 55105. I am writing to ask the City Council to amend the proposed updates to the Mississippi River Corridor Critical Area to be more in line with city staff's initial recommendations with regards to building height limits in the Urban Core.

I am concerned that the 35-foot base height limit and tiered setback system proposed in the Planning Commission's recommendation are overly complex and burdensome and would require nearly any proposed development in the Urban Core area to apply for a Conditional Use Permit. This is at odds with the city's goals of creating a vibrant, thriving downtown and sustainable tax base.

Thank you for your commitment to the city.

Best,

Dan Waddell

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From: [Paul Fiesel](#)
To: [*CI-StPaul Contact-Council](#)
Subject: Support Balanced MRCCA Updates for Downtown
Date: Tuesday, November 18, 2025 3:09:41 PM

You don't often get email from plfiesel@gmail.com. [Learn why this is important](#)

Dear Councilmembers,

I am writing regarding the proposed updates to the Mississippi River Corridor Critical Area zoning. I ask you to amend these updates to be more in line with the city staff's initial recommendations in regards to building height limits in the Urban Core. The 35-foot base height limit and tiered setbacks are needlessly complex and burdensome and would make development in downtown difficult. While developers can request a conditional use permit, we should not make the proceeds more expensive and time consuming to allow buildings of similar size to other buildings that already exist downtown.

Best regards,

Paul Fiesel
1992 Jefferson Ave

From: [Cheyenne Violet](#)
To: [*CI-StPaul Contact-Council](#)
Subject: MRCCA
Date: Tuesday, November 18, 2025 2:43:39 PM

You don't often get email from cheyenneviolet@outlook.com. [Learn why this is important](#)

My name is Cheyenne, and I live in Ward 2. I am writing to ask the City Council to amend the proposed updates to the Mississippi River Critical Corridor Area to be more in line with city staff's initial recommendations with regards to building height limits in the Urban Core/Urban Mixed areas. I am concerned that the 35-foot base height limit and tiered setback system proposed in the Planning Commission's recommendation are overly complex and burdensome, and would require nearly any proposed development in the Urban Core area to apply for a Conditional Use Permit. This is at odds with the city's goals of creating a vibrant, thriving downtown and sustainable tax base. Thank you for your commitment to the city.

Cheyenne Violet

She/Her/Hers

Downtown Revitalization Committee (SSP) Co-chair

C: (952) 358-0267

E: cheyenneviolet@outlook.com

From: [Scott Berger](#)
To: [*CI-StPaul Contact-Council](#)
Subject: Rethink MRCCA Updates for Downtown
Date: Tuesday, November 18, 2025 2:38:03 PM

You don't often get email from scott.allen.berger@gmail.com. [Learn why this is important](#)

Dear Saint Paul City Council,

I request that you, the City Council, revise the proposed Mississippi River Corridor Critical Area updates so that the building-height limits in the Urban Core better reflect the original recommendations from city staff.

I'm concerned that the Planning Commission's proposed 35' base height and the accompanying tiered setback structure are unnecessarily restrictive and complicated, especially for urbanized and downtown areas. As I understand it, they would force almost any project in the Urban Core to seek a Conditional Use Permit, creating hurdles that run counter to our goals for a dynamic downtown and a strong, sustainable tax base. Developers often complain about "red tape" and "uncooperative government regulations" in Saint Paul, and this appears to be an exhibit in support of their complaints, at least as currently proposed

Please make it easier for developers to construct new buildings, especially tall and dense ones, and we will welcome more neighbors, and more tax base in our great city.

Scott Berger
1452 Ashland Avenue

From: [Casey Ulrich](#)
To: [*CI-StPaul Contact-Council](#)
Subject: Support Balanced MRCCA Updates for Downtown
Date: Tuesday, November 18, 2025 2:18:19 PM

You don't often get email from culrich@uwalumni.com. [Learn why this is important](#)

My name is Casey Ulrich, and I live at 1723 Field Avenue in Saint Paul. I am writing to ask the City Council to amend the proposed updates to the Mississippi River Corridor Critical Area to be more in line with city staff's initial recommendations with regards to building height limits in the Urban Core.

I am concerned that the 35-foot base height limit and tiered setback system proposed in the Planning Commission's recommendation are overly complex and burdensome, and would require nearly any proposed development in the Urban Core area to apply for a Conditional Use Permit. This is at odds with the city's goals of creating a vibrant, thriving downtown and sustainable tax base.

Thank you for your commitment to the city.

Casey Ulrich
1723 Field Ave, St Paul, MN 55116

From: [Kevin Gallatin](#)
To: [*CI-StPaul Contact-Council](#)
Subject: Proposed MRCCA height requirements
Date: Tuesday, November 18, 2025 1:30:08 PM

Council President Noecker and city council members,

I am writing to express my concern with the complex patchwork of height allowances in the latest MRCCA proposal. I appreciate all of the thought and care for our natural environment that went into the current proposal. The bird safe glass provisions are wise, but I think the tiered heights go too far and will discourage investment and population growth in our city and encourage continued growth into greenfield sites at the edges of the metro area. Now more than ever, Saint Paul needs to be clear and consistent with rules around zoning and form. Creating a complex series of overlays with even more CUPs is a step backwards. I support restoring the MRCCA proposal along the lines of staff recommendations.

Thanks,
Kevin Gallatin
1822 Highland Pkwy
Saint Paul

November 18, 2025

Saint Paul City Council
15 West Kellogg Boulevard
Saint Paul, MN 55102

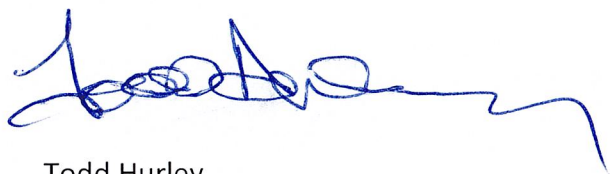
On behalf of the Saint Paul Port Authority, whose mission is to protect the integrity of the working river and expand jobs and tax base for our community, we respectfully urge the City Council to exempt the Urban Core from the new height restrictions proposed in the Mississippi River Corridor Critical Area (MRCCA) ordinance.

Downtown Saint Paul is at a pivotal moment. Our ability to attract and retain employers, grow the commercial tax base, reduce the burden on homeowners, and ensure a vibrant future for our city depends on fostering an environment where catalytic projects such as RiversEdge can move forward and inspire additional investment. While we appreciate the intent behind the MRCCA ordinance, the proposed height restrictions introduce uncertainty that threatens both ongoing and future development at a time when growth is urgently needed.

As you consider the MRCCA ordinance, it is essential that we strike the right balance—protecting one of our greatest natural resources, supporting the Mississippi River's vital role as a working river, and ensuring the economic success of our Urban Core. We appreciate that the ordinance maintains critical exemptions for river-dependent uses, including barge loading and unloading during the shipping season. However, the new height restrictions would jeopardize the creation of future jobs and the expansion of the tax base that downtown Saint Paul needs to thrive.

Thank you for your thoughtful consideration and for your continued partnership in advancing Saint Paul's economic future.

Sincerely,



Todd Hurley
President and CEO
Saint Paul Port Authority



November 19, 2025

Council President Rebecca Noecker
Councilmember Anika Bowie
Councilmember Saura Jost
Councilmember Molly Coleman

Council Vice President Hwa Jeong Kim
Councilmember Nelsie Yang
Councilmember Cheniqua Johnson

RE: MRCCA

Ordinance 25-72 Exempt the Urban Core from New Height Restrictions

On behalf of the Minnesota Wild and Saint Paul Arena Company, I am writing to urge the City Council to exempt the Urban Core from the height restrictions proposed ordinance 25-72 pertaining to the Mississippi River Corridor Critical Area.

Together with the City, we are excited to continue advancing the proposed renovations of Grand Casino Arena and the RiverCentre complex. As proposed, the ordinance would add unnecessary barriers and restrict the ability to build upon these investments with a bigger vision for the entertainment district. A vision that includes the potential of redeveloping the RiverCentre Parking Ramp into a convention center hotel and building additional housing along Eagle Parkway.

Expansion of the Entertainment District with projects like these will provide the opportunity to help revitalize the downtown by significantly building on the current impact of the RiverCentre/Grand Casino Arena Complex that annually hosts over 400 events, attracting over 2.1 million patrons and leading to \$383 million in annually spending in the City of St. Paul.

This would also permit Ramsey County to move forward on the complimentary RiversEdge project that not only connects downtown to the Mississippi River but will significantly contribute to the growth and revitalization of downtown.

Therefore, we urge the Council to exempt the Urban Core from height restrictions in the proposed ordinance 25-72. Adding this exemption would meet the goals of this well-intentioned ordinance while still providing for these critical downtown projects to move forward.

Thank you for time and consideration.

Sincerely,

Matt Majka
President and CEO Minnesota Wild



From: [Niko Le Mieux](#)
To: [*CI-StPaul Contact-Council](#)
Cc: [#CI-StPaul Ward5](#); [#CI-StPaul Ward2](#)
Subject: MRCCA Hearing - We Live in a City
Date: Wednesday, November 19, 2025 12:46:38 AM

You don't often get email from niko.lemieux@gmail.com. [Learn why this is important](#)

President Noecker, Council Vice President Kim,

My name is Niko LeMieux, I live in ward 2, I serve as chair for Ramsey County's CIPAC Committee, and I'm writing to ask the City Council to amend the proposed city updates to MRCCA to be more in-line with city staff recommendations to relax the limits on building heights and setbacks as these limitations are not in the spirit of the MRCCA.

We live in a city with many needs and many opportunities to meet them, and we need to behave like it. Saint Paul is facing significant challenges, and one of the largest is that we have a significant contingent of citizens convinced that we can act like an ecological wildlife refuge and stop all forms of urban growth in the city core, while downtown properties rot and new development is stymied behind layers of burdensome red tape. AECOM has wanted to develop the old jail site for going on 7 years, they should be allowed to do so. The Bridges project in 2001 should have been approved so that we could have a thriving community on the river. Flaherty & Collins should be allowed to spend \$130 million to improve the Central Station parcel. I have personally been given the option of buying downtown property and elected not to do so because of the relentless barriers and fees imposed upon folks trying to improve the community. Cities are meant to be lived in, and we are one of the few river cities lacking the imagination and gumption to create a thriving downtown and unlock our river to support a vibrant city. We can have a growing, diverse, and thriving tax base; or we can have urban decay and watch as businesses and people leave for the suburbs because taxes keep rising.

You have an opportunity today to give our new Mayor a valuable tool to revitalize and grow our city into a flourishing Capitol while preserving what makes this city a fantastic place to live in. Please make the right decision and amend to match something closer to city staffs' initial recommendations.

Thank you,
Niko

--

Niko Le Mieux
Ph +1.612.600.6273 | [LinkedIn](#)

From: [Christopher Woxland](#)
To: [*CI-StPaul Contact-Council](#)
Subject: Mississippi River Corridor Critical Area (MRCCA) zoning update
Date: Tuesday, November 18, 2025 11:18:12 PM

[You don't often get email from c.woxland521@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Hi,

My name is Christopher Woxland, ward 1 resident in Saint Paul and I am writing to voice my concern and press for an amendment to the height limits being proposed, particularly in the “Urban Core” section of this new zoning overlay.

As someone who grew up in south Highland I am evidently aware of how important it is to protect the river from certain types of development to preserve it. However I feel this zoning height restriction is quite misguided in that effort. Downtown is already mainly developed around the river, with a huge development potential along Kellogg to help regenerate our downtown. This zoning overlay kills that potential development while not protecting the river. Shepherd Road does far more harm to the river and its trails than a development in this urban core that goes over 35 feet ever would.

I urge these height restrictions to be amended and instead for the council to focus on reducing Shepherd Roads impact to environment around it.

From: [Chris Olendorf](#)
To: [*CI-StPaul_Contact-Council](#); [#CI-StPaul_Ward3](#)
Subject: Support Balanced MRCCA Updates for Downtown
Date: Tuesday, November 18, 2025 10:35:03 PM

You don't often get email from chrisolendorf@comcast.net. [Learn why this is important](#)

Dear Councilmembers,

My name is Chris Olendorf and I live at 1877 Grand Ave Apt 202. I am writing to ask the City Council to amend the proposed updates to the Mississippi River Corridor Critical Area to be more in line with city staff's initial recommendations with regards to building height limits in the Urban Core.

I am concerned that the 35-foot base height limit and tiered setback system proposed in the Planning Commission's recommendation are overly complex and burdensome, and would require nearly any proposed development in the Urban Core area to apply for a Conditional Use Permit. This is at odds with the city's goals of creating a vibrant, thriving downtown and sustainable tax base.

Thank you for your service to the city.

Chris Olendorf

From: [Jacob Hooper](#)
To: [*CI-StPaul Contact-Council](#)
Subject: Support Balanced MRCCA Updates for Downtown
Date: Tuesday, November 18, 2025 9:11:54 PM

You don't often get email from jacobhoopermn@gmail.com. [Learn why this is important](#)

My name is Jacob Hooper and I live at 811 Como Ave Apt 8. I am writing to ask the City Council to amend the proposed updates to the Mississippi River Corridor Critical Area to be more in line with city staff's initial recommendations with regards to building height limits in the Urban Core/Urban Mixed zones.

I am concerned that the 35-foot base height limit and tiered setback system proposed in the Planning Commission's recommendation are overly complex and burdensome, and would require nearly any proposed development in the Urban Core area to apply for a Conditional Use Permit. This is at odds with the city's goals of creating a vibrant, thriving downtown and sustainable tax base.

Our riverfront is one of our most underutilized assets in Saint Paul. Other cities with much less riverfront territory create beautiful walkable amenities that become a major draw to people around and beyond the cities. We do not have this, which is super disappointing. More than that, we are a city that is desperate to get property taxes under control. To do so, we need a dense and thriving downtown. I really don't see how such a strict limitation is going to help us achieve this.

Proponents of these changes may say that people can just get a CUP... that is not acceptable. Under such a system, we would be lucky to see an endless parade of CUPs wasting the city council's time and gumming up the process. More likely, a lot of projects will be killed before they have even begun. We can insist all we want that a CUP is easy to get (its not), but if you can't build by right the banks are not going to lend.

Please make this amendment or vote this down. As it is, this ordinance would be a huge setback (pardon the pun) for the city of Saint Paul.

Thank you for your commitment to the city.

Jacob Hooper
811 Como Ave Apt 8

From: [Sustain Saint Paul](#)
To: [*CI-StPaul Contact-Council](#)
Subject: Support Balanced MRCCA Updates for Downtown
Date: Tuesday, November 18, 2025 9:02:59 PM
Attachments: [MRCCA Signed Resolution final \(1\).pdf](#)

You don't often get email from info@sustainstpaul.org. [Learn why this is important](#)

Please enter the attached official statement from Sustain Saint Paul into the public record for the City Council's public hearing for Ord 25-72 "Amending Chapters 60,61,68, and 72 of the Legislative Code pertaining to the Mississippi River Corridor Critical Area and the Flood Plain Management Overlay Districts." taking place on Wednesday November 19th. Thank you for your commitment to the city of Saint Paul.

Jacob Hooper
Director of Operations and Advocacy
Sustain Saint Paul
715-612-0717



Abundant housing, low-carbon transportation, and sustainable land use

Sustain Saint Paul

PO Box 16164, Saint Paul, MN 55116

www.sustainstpaul.org | info@sustainstpaul.org

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Our Mission

Sustain Saint Paul champions abundant housing, low-carbon transportation, and sustainable land use in the City of Saint Paul through education, advocacy and political action, to ensure a more just and equitable city for all current and future residents.

Tuesday, November 18th, 2025

Dear Members of the City Council,

Sustain Saint Paul respectfully submits this comment regarding the proposed updates to the Mississippi River Corridor Critical Area (MRCCA). We appreciate the City's efforts to align local regulations with state DNR standards and support planning that protects the river corridor while enabling a thriving downtown.

We are concerned that the Planning Commission's proposed height limits for the Urban Core and Urban Mixed areas—specifically the 35-foot base height and tiered setback system—are overly complex and would impose significant burdens on development. Under these rules, nearly all projects would require a Conditional Use Permit, creating unnecessary barriers to new investment and limiting the city's ability to grow its downtown.

Saint Paul's downtown riverfront remains some of the city's most underutilized space. Thoughtful, dense development in the Urban Core along the riverfront is a key opportunity to create a vibrant downtown, increase economic activity, and strengthen the city's tax base. The City staff's original recommendations provide a more balanced approach, enabling responsible development while maintaining alignment with DNR standards and protecting natural areas along the river.

Sustain Saint Paul urges the City Council to amend the MRCCA updates to reflect the City staff's original recommendations. Supporting development in the Urban Core riverfront is essential to building a dense, economically sustainable, and vibrant downtown for the benefit of all Saint Paul residents.

Thank you for your consideration and for your commitment to thoughtful urban planning in Saint Paul.

Sincerely,

Sustain Saint Paul Board of Directors

From: [Katherine DuGarm \(she/her\)](#)
To: [*CI-StPaul Contact-Council](#)
Subject: Support Balanced MRCCA Updates for Downtown
Date: Tuesday, November 18, 2025 7:49:46 PM

You don't often get email from kdugarm@protonmail.com. [Learn why this is important](#)

My name is Katherine DuGarm and I live at 1142 Norbert Lane. I am writing to ask the City Council to amend the proposed updates to the Mississippi River Corridor Critical Area to be more in line with city staff's initial recommendations with regards to building height limits in the Urban Core.

I am concerned that the 35-foot base height limit and tiered setback system proposed in the Planning Commission's recommendation are overly complex and burdensome, and would require nearly any proposed development in the Urban Core area to apply for a Conditional Use Permit. This is at odds with the city's goals of creating a vibrant, thriving downtown and sustainable tax base.

As a city, we can both meet the requirements of the Mississippi River Corridor Critical Area, protect our environment, and meet housing needs to revitalize downtown.

Thank you for your commitment to the city.

Sent with [Proton Mail](#) secure email.

From: [Chad Hermes](#)
To: [*CI-StPaul Contact-Council](#)
Subject: Mississippi River Critical Corridor Area
Date: Tuesday, November 18, 2025 6:28:09 PM

You don't often get email from chadkhermes100@gmail.com. [Learn why this is important](#)

Dear Councilmembers,

My name is Chad Hermes and I am writing to express my strong support for the original Mississippi River Critical Corridor plan and my opposition to the Planning Commission proposal.

We have a serious problem in this city with housing supply and overall development. Adopting the Planning Commission's version rather than the option created by city staff would place further limitations on the ability of people to bring in economic growth, revitalize downtown, and create a sustainable tax base. The 35-foot base height limit and tiered setback system proposed in the Planning Commission's recommendation are overly complex and burdensome, and would require nearly any proposed development in the Urban Core area to apply for a Conditional Use Permit. We should be making building more straightforward and this plan does the opposite.

I encourage you to amend the proposed updates to the Mississippi River Critical Corridor Area to be more in line with the initial recommendations of the city's own staff with regards to building height limits in the Urban Core and Urban Mixed zones. Implementing increasingly burdensome zoning plans makes future property tax increases, at a time when the city cannot afford any more hikes, more likely. Less restrictive zoning makes development more likely and development means easing the strain on the budgets of the city and its residents.

Thank you,

Chad K. Hermes
1004 Barrett St.

From: [Allan Torstenson](#)
To: [*CI-StPaul Contact-Council](#); [CouncilHearing \(CI-StPaul\)](#)
Cc: [Allan Torstenson](#)
Subject: MRCCA Ordinance 25-72 Public Hearing Written Comments
Date: Tuesday, November 18, 2025 5:15:01 PM
Attachments: [MRCCA CC Ltr 11-19-25.pdf](#)

You don't often get email from allan.torstenson@gmail.com. [Learn why this is important](#)

My written comments on MRCCA Ordinance 25-72 are attached

1555 Branston Street
Saint Paul, MN 55108
19 November 2025

Saint Paul City Council
15 W Kellogg Boulevard
Saint Paul, MN 55102

RE: MRCCA Ordinance 25-72 – Comments on Structure Height Standards

Dear President Noecker and Members of the City Council:

Thanks for the opportunity to comment on Saint Paul's newly updated proposed Mississippi River Corridor Critical Area (MRCCA) ordinance.

State of Minnesota MRCCA Rules adopted in 2017 have maximum structure height standards that additionally require lower heights closer to the river and blufflines (tiering). The height language recommended by the Planning Commission in draft Ordinance 25-72 is not more restrictive than this. The defined tiering slopes in the proposed Saint Paul language do not limit height or change the base structure height standards set in the MRCCA Rules. Rather, they define slopes for areas close to the river and blufflines under which almost all likely development would be automatically approved for conformance with MRCCA tiering requirements. This is less restrictive than all other local MRCCA ordinances, none of which automatically approve any specific building heights for conformance with MRCCA tiering requirements.

Without the defined tiering slopes, a subjective decision on conformance with the vague tiering requirement would be needed in every case, creating unnecessary difficulty for city staff. American Planning Association guidelines for well-written zoning ordinances say that vague language should be avoided. Clear language creates predictability in the development process, deters legal challenges, simplifies administration, and saves time for everyone. For these reasons, a model MRCCA ordinance provided by the DNR suggests replacing the vague tiering language with specific permitted height standards based on distance from the river.

It's important that there would always be a clear conditional use permit process and standards for Planning Commission review in the few cases where a subjective decision about conformance with MRCCA tiering requirements is needed for tall structures above the defined tiering slopes. The CUP process is our standard, often used, best way to permit additional height where subjective review is needed to consider and limit potential negative impact. The CUP process is not onerous, especially for the few very large projects to which the MRCCA CUP language would apply. We commonly require CUPs for much smaller projects with less potential impact.

The State adopted the MRCCA rules in 2017 after an extensive public process that involved local units of government and many others. The Planning Commission held a public hearing on draft MRCCA Rules in 2014, and the City Council held a public hearing in 2016. Comments were sent to the DNR after those public hearings, included comments pertaining to development opportunity sites and height standards, and the draft Rules were amended in response. The mayor and City Council submitted City comments on the Rules to an administrative law judge in 2016 during the state's formal rulemaking process, which included additional state public hearings. The City is required to adopt a local MRCCA ordinance in conformance with the State MRCCA Rules.

Sincerely,

Allan Torstenson

allan.torstenson@gmail.com

651-307-8393

From: [Andrew Sun](#)
To: [*CI-StPaul_Contact-Council](#)
Cc: [Joe Spencer](#); [Emma Burns](#)
Subject: Public Comments re: Ord. 25-72 MRCCA
Date: Tuesday, November 18, 2025 4:55:23 PM
Attachments: [image001.png](#)
[image002.png](#)
[SPDA 11.19.2025 Ord. 25-72 MRCCA Public Comments.pdf](#)

You don't often get email from andrew.sun@downtownstpaul.com. [Learn why this is important](#)

Good afternoon,

Joe Spencer's public comments on behalf of the SPDA for MRCCA Ordinance 25-72 is attached.

Thank you,
Andrew

ANDREW SUN | EXECUTIVE ADMINISTRATOR
[Saint Paul Downtown Alliance](#)
andrew.sun@downtownstpaul.com
609-375-5585

Stay in the know about downtown Saint Paul, [sign up for our newsletter](#).



November 19, 2025

Council President Rebecca Noecker
Councilmember Anika Bowie
Councilmember Saura Jost
Councilmember Molly Coleman

Council Vice President Hwa Jeong Kim
Councilmember Nelsie Yang
Councilmember Cheniqua Johnson

Re: MRCCA Ordinance 25-72 – Exempt the Urban Core from New Height Restriction

On behalf of the Saint Paul Downtown Alliance, thank you for the opportunity to comment on the proposed updates to the Mississippi River Corridor Critical Area (MRCCA). We appreciate the City's work to align local regulations with state DNR standards and support approaches that protect the river corridor while enabling a strong and resilient downtown.

We share the concerns raised by community partners—including Sustain Saint Paul, the St. Paul Area Chamber, and many others—regarding the Planning Commission's proposed height limits for the Urban Core and Urban Mixed districts. The 35-foot base height and tiered setback system create a level of complexity that would make most projects in the Urban Core subject to Conditional Use Permits. This introduces uncertainty, slows timelines, and creates barriers to the kinds of investments the Downtown Investment Strategy identifies as essential to downtown's recovery and long-term vitality.

The downtown riverfront remains one of the city's most significant opportunities. Encouraging thoughtful, dense development—particularly along the bluff and river's edge—is critical to attracting new residents, expanding the tax base, and delivering the public amenities and activity that strengthen the city as a whole. City staff's original recommendations offer a more balanced and workable approach: they maintain alignment with DNR standards, protect natural resources, and still support the scale of development needed for downtown to thrive.

In that spirit, and in partnership with other organizations committed to downtown's future, we respectfully urge the Council to amend the MRCCA updates to reflect City staff's original recommendations. Ensuring that the Urban Core riverfront can accommodate responsible development is central to realizing the goals of the Downtown Investment Strategy and building a vibrant, economically sustainable downtown for all Saint Paul residents.

Thank you for your consideration and for your continued leadership on the future of downtown.

Sincerely,

Joe Spencer
President, Saint Paul Downtown Alliance

Sincerely,

A handwritten signature in blue ink that reads "Joe Spencer". The signature is stylized with a large, looped "J" and a cursive "Spencer".

Joe Spencer
President, Saint Paul Downtown Alliance

From: [Brian K. Winkelaar](#)
To: [*CI-StPaul Contact-Council](#)
Subject: RiversEdge Comments - IBEW 110
Date: Tuesday, November 18, 2025 4:13:55 PM
Attachments: [RiversEdge - planning.pdf](#)

You don't often get email from bwinkelaar@ibew110.org. [Learn why this is important](#)

To whom it may concern:

Attached you will find IBEW 110 comments concerning the RiversEdge redevelopment.

Thankyou for taking the time to hear our concerns

Respectfully,

Brian Winkelaar
Business Representative
International Brotherhood of Electrical Workers Local 110

IBEW LOCAL 110

Affiliated with the AFL-CIO



Doug Suchanek
BUSINESS MANAGER
FINANCIAL SECRETARY

1330 Conway Street
Suite 110
St. Paul, Minnesota 55106

651-776-4239
Fax: 651-772-8795
www.ibew110.org

Referral Office
651-776-4239 ext. 740



To Whom It May Concern:

On behalf of the 2,500 members of the International Brotherhood of Electrical Workers Local 110, I am writing to express our deep concern regarding the proposed MRCCA language for the RiversEdge site. As currently drafted, this language is far too restrictive for the needs of downtown and the redevelopment this site urgently requires.

The proposed MRCCA language brought forward by the Planning Commission would severely limit vertical development at RiversEdge, capping building heights at just one story above Kellogg Boulevard. This is not only a significant expansion of height restrictions in the downtown area, but it also introduces an extraordinary level of complexity for the RiversEdge project. Downtown St. Paul consistently punches above its weight in generating county tax revenue relative to its size, and now is not the time to make investment in downtown more difficult.

We strongly support Councilmember Jost's proposed amendment, which offers a common-sense approach to the development that the City of St. Paul desperately needs. This amendment strikes the right balance between environmental considerations and the economic vitality of our downtown riverfront.

Thank you for your attention to this matter. We urge you to adopt a framework that enables meaningful redevelopment and ensures the long-term success of our city.

Sincerely,

Brian Winkelaar

International Brotherhood of Electrical Workers Local 110



*Protecting, restoring and enhancing the metro
Mississippi River and its watershed since 1993.*

106 W. Water St., Ste. 600 | St. Paul MN 55107-2032
(651) 222-2193 | fmr.org | info@fmr.org

October 29, 2025

Dear Councilmembers:

Thank you for the opportunity to comment on St. Paul's proposed Mississippi River Corridor Critical Area (MRCCA) ordinance.

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. We represent thousands of people in the Twin Cities who care deeply about the river, including over 6,000 who participate as FMR advocates, volunteers, and members each year.

The Mississippi River is a natural, cultural, and historic wonder that helps define our metro area. In recognition of this, its 72-mile stretch through the Twin Cities is not only a state-designated Critical Area but also a national park afforded special protective policies.

The MRCCA ordinance adoption process is an important opportunity for communities to define their goals and expectations for years to come. A successful ordinance will guide riverfront use in a way that reflects the city's environmental, development, and recreational priorities while providing clarity for residents and developers.

We are happy to see this ordinance reach the City Council for consideration after years of inexcusable delay. The Minnesota DNR and City originally agreed to an ordinance adoption deadline of January 20, 2021. The City has missed this deadline by nearly five years without any clear explanation from PED leadership or Mayor Carter's office about why. We appreciate the council's interest in and engagement on this issue throughout the past several years.

Overall, the current proposed ordinance is a significant improvement over the draft that had a public hearing at the May 2, 2025, Planning Commission meeting. Staff revisions in response to feedback have made the ordinance much clearer and easier to apply.

However, one key element is still missing: a bird-safe glass requirement.

Recommendation: bird-friendly glass requirement

The Mississippi River is a crucial migratory flyway for about 40% of all North American migrating birds. Roughly 270 bird species live in or travel through the Twin Cities river flyway. Bird populations are

experiencing significant collapse and are under continued threat. In the U.S. it's estimated that 600 million birds are killed in window strikes each year.

A proven way to balance density with wildlife protection is to require bird-friendly building materials in all new development along the river. **The state of Minnesota already incorporates such specifications into its B3 Sustainable Building Guidelines for state bond-funded projects.** FMR recommends that St. Paul require adherence to the same or similar specifications for all new buildings constructed within MRCCA. Case studies have found the cost of bird-friendly glass to be **well under one percent of total project cost.**

Straightforward bird-friendly glass specifications were included in the January 2023 draft MRCCA ordinance; public response to this proposal was enthusiastic. The most recent draft removes this requirement.

PED staff have suggested initiating a separate study about bird-friendly glass instead. We're concerned that this study may never be completed. Given the five-year delay in MRCCA ordinance adoption, it's hard to trust that any future studies will be completed in a timely manner.

We ask the Council to restore the bird-safe glass language proposed in the 2023 MRCCA ordinance draft (see the Addendum at the end of this letter for that language). In addition to its alignment with state B3 standards, this language is supported by the National Audubon Society.

Building height requirements and River's Edge

We understand that the River's Edge project at Ramsey County's former downtown jail site is of special concern. The height limits in the proposed ordinance **do not pose a conflict with this project.**

DNR rules state that the MRCCA Urban Core (UC), Urban Mixed (UM) and River Town and Crossing (RTC) districts must prioritize "tiering of structures away from the Mississippi River and from blufflines... with lower structure heights closer to the river."

Tiered building heights promote stronger urban form, improve river views and river-oriented development (including for sites further back from the river), and create a more welcoming sense of scale and relationship to the river. Height limits also help protect scenic views from St. Paul's excellent riverfront parks, vital to providing equitable access to natural areas that don't require a car to reach.

Tiering is not optional. The state requires it. St. Paul's proposed ordinance addresses this more clearly than any other city's by using a straightforward linear height formula based on the building's distance from the shoreline. This is the simplest way to meet the DNR requirement by minimizing unnecessary discretionary processes, subjective decision-making, and community conflict. Any building height in compliance with the ordinance will be approved by right.

Although the DNR does not require overall height limits in the Urban Core MRCCA district, it does still require tiered building heights close to the river. The DNR will not approve an ordinance that

eliminates this tiering requirement. Every draft of St. Paul's ordinance has included some way to actualize this requirement along the downtown riverfront.

For unique sites like River's Edge, the proposed Conditional Use Permit (CUP) process offers a sensible pathway. The goal of tiering is to promote viewsheds to and from the river. The River's Edge proposal can accomplish the spirit of that goal—but without requiring the buildings to be shorter than those behind them—by aligning the towers to preserve view corridors down city streets as well as creating a new public realm on the river-facing side of the project.

Since 2019, FMR has said publicly that we support the River's Edge proposal contingent upon the preservation of these view corridors and the creation of expansive public space. (We also appreciate that the County has been committed to bird-friendly glass for this project since 2019 and remains so today.)

Given the importance of the downtown riverfront and its challenging geography, **the City should want an ordinance that triggers a CUP for unique projects** to ensure that development meets the public interest. A CUP process is the best possible way to comply with state mandates while still allowing the creativity and flexibility needed for projects like River's Edge. Given the public benefits River's Edge will provide, it should have no difficulty meeting the CUP criteria.

Please don't hesitate to contact me at ctoberman@fmr.org or 651-477-0923 to discuss any of our comments further. FMR also has extensive MRCCA ordinance resources (including videos, handouts, and interactive maps) available at www.fmr.org/river-rules.

Thank you for your time and consideration.

For the river,

A handwritten signature in black ink that reads "Colleen O'Connor Toberman". The signature is fluid and cursive, with the first name "Colleen" being the most prominent.

Colleen O'Connor Toberman
Land Use & Planning Director

Addendum: Bird-friendly buildings language (January 2023 draft MRCCA ordinance)

Sec. 68.248. Bird-safe glass.

(a) Bird-safe glass, with treatments to reduce bird collisions with the glass, must be used on the first 70 feet above grade of new buildings and building additions as follows.

- 1) For building elevations comprised of 50% or more glass on any floor, at least 85% of the glass must be treated.
- 2) For building elevations comprised of less than 50% glass on any floor, at least 85% of glass areas of more than 50 square feet must be treated.
- 3) For glass areas of more than 50 square feet, any glass within 15 feet of a building corner must be treated.
- 4) All glass railings and glass on enclosed building connections must be treated.

(b) Bird-safe glass treatments may include the following:

- 1) Full surface glass treatment such as frosted glass or stained glass to make it visible;
- 2) Physical structures on the exterior of the glass such as grills and screens; and
- 3) Glass patterns visible from the outside such as white to medium gray permanent stencils, ceramic frit, and UV patterns visible to birds.

To qualify as a bird-safe glass treatment, line patterns must have a minimum of ¼ inch wide lines and 2 inch on-center spacing, and dot patterns must have a minimum of ⅜ inch wide dots and 2 inch on-center spacing each way.

From: [Kathy Glover](#)
To: [*CI-StPaul Contact-Council](#)
Subject: bird safe glass in the Mississippi River corridor
Date: Thursday, November 20, 2025 7:29:37 AM

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Greetings,

I offer the following comments regarding the decision the City Council will be making regarding requiring bird safe glass in construction along the Mississippi River corridor. Why protect birds?

You could argue that we *need* them—they keep insect populations down, for example. Some of us enjoy them. Feel a kinship with them, wonder at their lives. The way the process of evolution created them out of dinosaurs; how they migrate from one end of the globe to the other. Some say we need to protect other animals in order that we protect *ourselves*—that a world in which a diversity of birds can't survive won't be good for anyone.

But...most of us can say we've been doing just fine since the last passenger pigeon died. I'll never see an ivory billed woodpecker, or a Backman's warbler. And neither will you. And yet we seem to be doing okay. I can't prove to you that protecting birds is in our best interest—that we *need* them. I can tell you that your life will be immeasurably enriched by paying attention to them—but if you don't you'll likely go on to have a rich rewarding life.

Meanwhile rates of extinction increase. Biodiversity decreases. Pressures due to climate change and habitat loss are doing great damage.

This is a catastrophic situation. We as a species keep asking other species to justify themselves somehow. To prove their value to us. How does the existence of any white throated sparrow stack up against my spreadsheet? My 401K. My profit margin?

We live in a prosperous nation, in a prosperous city; many of us, though not all, have access to education, health care, food. We need more housing, for sure. And we're working on that. The question before us is pretty basic: will the structures we build respect and accommodate the other living beings with whom we share the world—in this case, birds, who fly along the river as they migrate (and have done for thousands of years.)

Most of the time, we've chosen, as a species, to prioritize that which seems good for us. Annihilation of other species? We're mostly okay with that.

So then how *do* we answer the question I started with? Should we protect other species—in the case before us, birds, by requiring bird-safe glass be used in construction along our city's section of the Mississippi River?

As a species we have a *choice* about whether we continue on our destructive path. Or not.

Of all other life forms on Earth, humans have a unique capacity to **care** for the environment. To act in ways that respect the other living things we evolved along with—and we have a moral obligation to do so. In so doing, we live up to our human potential. It degrades us as human beings—and as a city—to be uncaring toward the other living things in our community. You *could* argue, we don't *need* them. But it is inarguable that they need *us*.

The right thing—the humane thing, the moral thing—is to add this simple, effective protection.

Respectfully,
Kathy Glover
St Paul

From: [Christopher Smith](#)
To: [*CI-StPaul Contact-Council](#); [Rebecca Noecker](#); [Nelsie Yang](#); [#CI-StPaul_Ward5](#); [#CI-StPaul_Ward7](#); [#CI-StPaul_Ward1](#); [#CI-StPaul_Ward4](#); [#CI-StPaul_Ward3](#)
Cc: [Tom Basgen](#); [Jenne Nelson](#); [Megan Jekot](#); [Biftu Adema-Jula](#); [Sarah Yang](#); [Melanie Johnson](#); [Abdihamid Badri](#)
Subject: MRCCA Recommendations
Date: Wednesday, November 19, 2025 2:58:18 PM

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Council President Noecker and Council Members,

My name is Chris Smith, and I am the Co-chair of Sustain St. Paul's Downtown Revitalization Committee. As a downtown resident for nearly thirteen years, I am writing to respectfully ask the City Council to amend the proposed updates to the Mississippi River Critical Corridor Area.

Specifically, I urge you to align the building height limits in the Urban Core more closely with the recommendations provided by City staff. I am concerned that the current proposed height restrictions would significantly chill or slow development within the downtown core.

Furthermore, during our committee meeting on Monday night, members expressed similar concerns, noting that the complexity of the Planning Commission's current proposal could impede development efforts. This approach appears to be at odds with the City's broader goals of fostering a vibrant, thriving downtown and building a sustainable tax base.

Thank you for your dedication and commitment to the city.

Sincerely,
Chris Smith -Sustain St. Paul, Board Member
250 6th St E
Apt 334
Saint Paul, 55101

From: [Jeff Zaayer](#)
To: [*CI-StPaul Contact-Council](#)
Subject: MRCCA updates
Date: Wednesday, November 19, 2025 11:25:02 AM

You don't often get email from jeffzaayer@yahoo.com. [Learn why this is important](#)

I appreciate the City's efforts to align local regulations with state DNR standards and support planning that protects the river corridor while enabling a thriving downtown.

However I am concerned that the Planning Commission's proposed height limits for the Urban Core and Urban Mixed areas—specifically the 35-foot base height and tiered setback system—are overly complex and would impose significant burdens on development. Under these rules, nearly all projects would require a Conditional Use Permit, creating unnecessary barriers to new investment and limiting the city's ability to grow its downtown.

Saint Paul's downtown riverfront remains some of the city's most underutilized space. Thoughtful, dense development in the Urban Core along the riverfront is a key opportunity to create a vibrant downtown, increase economic activity, and strengthen the city's tax base. The City staff's original recommendations provide a more balanced approach, enabling responsible development while maintaining alignment with DNR standards and protecting natural areas along the river.

Much of the existing development that allows more people to live near the river and interact with it. There are many development sites along the river that are severely limited compared to development at sites like Upper Landing. We should have regulations that encourage development like we already have.

Sincerely,
Jeff Zaayer
1750 Saunders Ave

From: [Melissa](#)
To: [*CI-StPaul Contact-Council](#)
Subject: Height of buildings in downtown
Date: Wednesday, November 19, 2025 10:28:46 AM

Dear Councilmembers,

I am writing to ask you to amend the proposed updates to the Mississippi River Critical Corridor Area to be more in line with city staff's initial recommendations with regards to building height limits in the Urban Core and Urban Mixed zones. I am concerned that the 35-foot base height limit and tiered setback system proposed in the Planning Commission's recommendation are overly complex and burdensome, and would require nearly any proposed development in the Urban Core area to apply for a Conditional Use Permit, and could limit the type of development we need in downtown to grow our tax base and help downtown Saint Paul thrive.

Please support the original proposed height options that don't limit downtown figuratively and literally.

Melissa Wenzel
349 Michigan Street
Saint Paul, MN 55102



Dear Council President and Members of the St. Paul City Council-

On behalf of the members of Sprinkler Fitters Local 417, I am writing to express our **strong opposition to the proposed limitations on building height for the downtown Rivers Edge project**. These restrictions would significantly reduce the economic potential of one of St. Paul's most valuable development sites and threaten hundreds of good paying, local union jobs.

This project represents more than just new buildings – It's a chance to **revitalize downtown St. Paul**, create family-sustaining construction careers, and generate lasting tax revenue that supports public services across the city. Implementing restrictive height caps would discourage investment, limit housing and commercial opportunities, and send a message that St. Paul is not open to responsible growth.

We understand the desire to preserve the beauty and accessibility of our riverfront. Union workers share those values – our members live and raise families in St. Paul and want a city that balances progress with sustainability. Rather than imposing ridged height limits, we encourage the Council to pursue **strong design guidelines, environmental protections and local labor requirements** that ensure any development enhances the community while keeping local workers on the job.

St. Paul's working families are counting on the council to move this project forward. We urge you to **reject the proposed height limitations** and adopt councilmember Jost's proposed amendment and support a vision for the riverfront that grows St. Paul's economy, strengthens our workforce, and reflects the best of St. Paul's city's future.

Thank you for your time, consideration, and continued partnership with the skilled workers who help build St. Paul every day.

In solidarity,

Trinidad J. Uribe III
Business Manager
Sprinkler Fitters Local 417

November 19, 2025

Council President Rebecca Noecker
Council Vice President Hwa Jeong Kim
Councilmember Anika Bowie
Councilmember Saura Jost
Councilmember Molly Coleman
Councilmember Nelsie Yang
Councilmember Cheniqua Johnson

RE: MRCCA Ordinance 25-72

Dear City Councilmembers,

Over the last several decades, the Ramsey County Board of Commissioners has pursued projects and initiatives in downtown and along the riverfront in alignment with the shared goals of the City and County and many others. This includes the RiversEdge project. When accomplished, the public-private partnership that is RiversEdge will create more than eight (8) acres of new, publicly accessible access to the riverfront as well as unlock nearly a billion dollars of private investment. We are advocating for a Mississippi River Corridor Critical Access (MRCCA) ordinance that enables the realization of that vision.

Saint Paul can only stand to benefit from development activity that adds density for residents and business. Adding a new set of obstacles to downtown development that do not currently exist would stifle our shared plans for the growth and revitalization of downtown.

To protect the existing and future opportunities to revitalize downtown, the County is advocating for the Structure Height language recommended by Planning and Economic Development staff at the September 19 Planning Commission meeting. We need merely to point to the staff recommendation which was based on a detailed analysis of public testimony: 1) It is inconsistent with guidance from the DNR, 2) it is inconsistent with the approach other cities have taken therefore contrary to the goal of coordinated land use along the river, 3) it is difficult to administer, and overly restrictive and 4) will impede downtown development.

It is impossible to overstate the level of complexity this ordinance has the potential to create for downtown developments such as RiversEdge. Currently, the underlying zoning does not require a Conditional Use Permit. Redevelopment projects, such as RiversEdge, will not occur without going through all the existing processes which are in place that require the necessary rigor and public input. Zoning Approvals, Site Plan Review, Building Plan Review, HPC review, Construction Permits, and on. The ways to get high quality development are already in place without overregulating the processes. Instead of wielding MRCCA like a stick for future developers you have an opportunity to use as a tool to

accomplish our mutual goals of providing coordinated land use planning and zoning regulations and protecting our natural, cultural, and scenic resources.

Just this week the County adopted our 2026 legislative platform that includes RiversEdge as our #1 bonding priority. The City has historically been very supportive of RiversEdge, and without state funds, our gap widens in a moment where we are on a path to full funding. Additionally, using the proposed formula to calculate base height, vertical development at RiversEdge is limited to 1-story above Kellogg Blvd. This translates to a loss of millions of dollars annually in tax revenue, lower city permitting fees, and significant missed opportunity for new jobs and housing units.

We have collectively worked hard in demonstrating downtown's importance – be it increasing housing, supporting increased job opportunities, expanding the tax base and stimulating excitement and energy. Let us find language that works together toward achieving the shared vision set forth in the Downtown Investment Strategy to create a more vibrant, active, inclusive, and economically resilient downtown. These steps include prioritizing redevelopment of RiversEdge and the RiverCentre ramp, both of which are impacted by this ordinance. While the spotlight is on RiversEdge because of existing momentum, it is impossible to miss the broader implications of height restrictions in this riverfront district which includes District Energy, the Science Museum, RiverCentre Ramp, the Arena Complex, and other property owners in the Urban Core as they contemplate future projects in support of a revitalized downtown.

We will strongly urge the council to consider amending structure heights in the Urban Core. The feasibility of RiversEdge and other downtown developments depend on it.

Sincerely,

A handwritten signature in black ink, appearing to read "Rafael Alcala", with a stylized flourish at the end.

Chair, Ramsey County Board of Commissioners

INTERNATIONAL UNION OF OPERATING ENGINEERS

LOCAL NO. 49, 49A, 49B, 49C, 49D, 49E, 49L
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MARVIN J. HOSE, Treasurer



RYAN P. DAVIES
Business Manager/Financial Secretary

2829 Anthony Lane South, Minneapolis, MN 55418-3285
Phone (612) 788-9441 • Toll Free (866) 788-9441 • Fax (612) 788-1936

November 19, 2025

To Whom It May Concern:

The International Union of Operating Engineers Local 49 represents over 13,000 working men and women in Minnesota. Our local union represents heavy equipment operators, mechanics, and surveyors in the construction industry, as well as stationary engineers who work in operations and maintenance in building and industrial complexes.

We appreciate the opportunity to communicate our positions on public policy issues at all levels of government. I am writing to express our concerns regarding the proposed MRCCA language for the Rivers Edge site.

As it is currently drafted by the Planning Commission, the language is unnecessarily restrictive for the redevelopment of this site. This site is in desperate need of investment and should be done in a way that improves downtown St. Paul in a transformational manner.

As you are aware, the Planning Commission recommendations include stricter height restrictions than the city staff recommended for the urban core district. The new restriction is also in direct conflict with the vision of the Downtown Investment Strategy. At a minimum, St. Paul should align its ordinance with state guidance and the similar approach taken by other cities along the river.

We support Councilmember Jost's proposed amendment which offers a viable alternative and finds an option that weighs environmental concerns as well as the economic development the city so desperately needs. We encourage you to approve a policy that maximizes substantial redevelopment in the city.

We appreciate the time, efforts, and work put in by the city's Planning Commission members and thank them for their service. But as expressed, we have concerns with this recommendation to the Council. We wish you the best in your deliberations.

Sincerely,

John Pollard
Legislative Director
International Union of Operating Engineers Local 49

From: [Rebecca Noecker](#)
To: [James Stolpestad](#)
Cc: [lukehanson91@gmail.com](#); [Cheyenne Violet](#); [jacobhoopermn@gmail.com](#); [Greg Weiner](#)
Subject: RE: Ord 25-72
Date: Tuesday, November 25, 2025 9:15:35 AM

Thanks Jamie. I'm sorry for the delayed response – I'm cc'ing our City Clerk Greg Weiner so he can add your message to the public record.

Best,
Rebecca

Rebecca Noecker | Saint Paul City Councilmember, Ward 2

15 West Kellogg Blvd – Suite 310B | Saint Paul, MN 55102
651.266.8622 | rebecca.noecker@ci.stpaul.mn.us

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From: James Stolpestad <jastolpestadii@gmail.com>
Sent: Monday, November 17, 2025 8:09 PM
To: Rebecca Noecker <Rebecca.Noecker@ci.stpaul.mn.us>
Cc: lukehanson91@gmail.com; Cheyenne Violet <cheyenneviolet@outlook.com>; jacobhoopermn@gmail.com
Subject: Ord 25-72

Think Before You Click: This email originated **outside** our organization.

Councilmember Noecker,

I am writing to strongly recommend that you and your fellow council members not support the recommendations of the Planning Commission outlined in proposed Ordinance 25-72.

The height restrictions, requiring conditional use permits, requiring so-called "bird-safe" glass and other provisions would have a significant negative impact on the revitalization of downtown St. Paul which would negatively impact the city's tax base and increase tax burdens on other residential property owners. The proposed regulations on the downtown core are completely inappropriate for the city on the river. As I read the language of the proposed ordinance, it would not permit new construction such as the Science Museum, the District Energy heating plant, Ramsey County East building, Custom House, Union Depot, any of the housing structures in the Upper Landing

development, Waterford Bay Apartments, Scenic Apartments, River Park Plaza and perhaps not even the City & County Building.

Taking any action that so completely subverts the future economic development of St. Paul is also completely inappropriate after the recent mayoral election in which 60% of voters expressed a desire for a different mayor. Please reject this inappropriate regulatory action and allow the new mayor to take a fresh look and propose something that is appropriate for downtown.

Thank you.

Jamie Stolpestad
Downtown Resident

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From: [Nathaniel M Hood](#)
To: [*CI-StPaul Contact-Council](#)
Subject: MRCCA - Support Councilmember Jost's Alternative Text
Date: Monday, November 24, 2025 8:31:31 AM

You don't often get email from nmhood@gmail.com. [Learn why this is important](#)

November 24, 2025

Attn:

Council President Rebecca Noecker and Members of the Saint Paul City Council

Dear Council President Noecker and Councilmembers,

As a Saint Paul resident, I urge you to support the Councilmember Jost alternative to the proposed amendments to Chapters 60, 61, 68, and 72 of the Legislative Code (MRCAA). This version strikes a critical balance between environmental protection and the need for downtown growth.

The current draft's height limit above Kellogg Boulevard in the Urban Core (UC) would severely hinder transformative projects like RiversEdge, as well as other needed changes around Kellogg Blvd. Overly restrictive height limits would not only jeopardize needed projects, but would also stall Saint Paul's broader goal of adding 20,000 downtown residents. With downtown housing occupancy above 90% and office vacancies rising, we must support projects that add density and needed economic vitality.

The CM Jost alternative for Sec. 68.234(f) allows height to follow underlying zoning while prioritizing tiered design and river views. It reflects thoughtful planning, aligns with the DNR model, and ensures Saint Paul remains competitive with other MRCCA jurisdictions.

I strongly encourage the Council to adopt this balanced approach.

Thank you, -Nate

Nathaniel Hood
1907 Hampshire Ave
nmhood@gmail.com

From: [Matt Frank](#)
To: [*CI-StPaul Contact-Council](#)
Subject: Support Balanced MRCCA Updates for Downtown
Date: Monday, December 1, 2025 5:22:11 PM

You don't often get email from mjfrank84@gmail.com. [Learn why this is important](#)

To Whom It May Concern,

proposed zoning changes to the MRCCA could severely limit future development downtown.

Sincerely,

Matt Frank
Downtown Condo Owner

From: [Rick Varco](#)
To: [*CI-StPaul Contact-Council](#); [CouncilHearing \(CI-StPaul\)](#)
Cc: [Jon Grebner](#)
Subject: ORD 25-72 Support Original Staff Rec for Height
Date: Monday, December 1, 2025 3:25:31 PM

Dear St. Paul City Council:

SEIU Healthcare MN & IA represents over 50,000 healthcare workers, including thousands who live in St. Paul. We represent workers at United Hospital and the Healthpartners Wabasha Clinic, which are both close to the site at issue in ORD 25-72/MRCCA.

We join with others, especially Sustain St. Paul who have expressed concerns with the Planning Commission's proposed height limits for the Urban Core and Urban Mixed areas. We urge the Council to amend ORD 25-72 to reflect the original staff recommendation.

Height limits have little to no value anywhere in the city, but they certainly have no place in downtown. The visual preferences of some should not outweigh the need of everyone in St. Paul for more places to live and work at a lower cost.

Rick Varco

Political Director

This communication, including any attachments, may contain information that is proprietary, privileged, trade-secret, or confidential. If you are not the intended recipient, you are hereby notified that you are not authorized to read, print, retain a copy of or disseminate any portion of this communication without the consent of the sender and that doing so may be unlawful. If you have received this communication in error, please immediately notify the sender via return email and immediately delete it from your system.

From: [Erica Eilers](#)
To: [#CI-StPaul_Council](#)
Subject: Downtown Zoning
Date: Monday, December 1, 2025 12:59:34 PM

[Some people who received this message don't often get email from eilers.eric@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Think Before You Click: This email originated outside our organization.

To the City Council,

I ask the Council to align MRCCA updates with City staff's recommendations on Urban Core/UM building heights. The tiered setbacks are complex and burdensome, limiting development. A balanced approach supports downtown density, the tax base, and sustainable growth.

Thank you.

Erica Eilers
292 Cleveland Ave N, 55104

From: [Roger Guy](#)
To: [*CI-StPaul Contact-Council](#)
Subject: Proposed zoning changes to the Mississippi River Critical Corridor
Date: Monday, December 1, 2025 12:47:56 PM

You don't often get email from rogerstephenguy@gmail.com. [Learn why this is important](#)

Dear St. Paul City Council,

I request the Council to align MRCCA updates with City staff's recommendations on Urban Core/UM building heights. The tiered setbacks are complex and burdensome, limiting development. A balanced approach supports downtown density, the tax base, and sustainable growth.

Thank you.

Roger Guy
488 Wabasha St. N Apt 604
St. Paul , MN 55102

From: [Andrew Escobedo](#)
To: [*CI-StPaul Contact-Council](#)
Subject: MRCCA Updates for Downtown
Date: Monday, December 1, 2025 12:45:46 PM

You don't often get email from bedo7667@gmail.com. [Learn why this is important](#)

Hello,

As a downtown resident, at 523 Jackson Street, that is looking forward to an increase in density to the neighborhood I am writing to ask the City Council to amend the proposed updates to the Mississippi River Corridor Critical Area to be more in line with city staff's initial recommendations with regards to building height limits in the Urban Core.

I am concerned that the 35-foot base height limit and tiered setback system proposed in the Planning Commission's recommendation are overly complex and burdensome, and would require nearly any proposed development in the Urban Core area to apply for a Conditional Use Permit. This is at odds with the city's goals of creating a vibrant, thriving downtown and sustainable tax base.

If we are trying to increase the population of downtown we need to allow for larger development that will bring in residential and business growth and should be building along the river and making the riverfront a more friendly destination for human activities since it's currently an unfriendly poorly lit highway.

Thank you,

Andrew Escobedo

From: [James Slegers](#)
To: [*CI-StPaul Contact-Council](#)
Subject: Amend MRCCA plan to align with planning staff's proposal
Date: Monday, December 1, 2025 12:42:36 PM

My name is James Slegers and I live in Ward 4.

The City Council should amend the proposed changes to the MRCCA to be more in line with planning staff's proposal. As recommended by the Planning Commission, the unamended plan would put unnecessary and complex height restrictions on developments downtown, requiring a CUP for most reasonable construction plans. This is an area where we desperately need to develop the tax base, and where we should be encouraging development. The planning staff proposal was fully in line with DNR requirements and better reflective of the city's overall development goals.

Please amend this plan and do not adopt the 35 foot base limit with setbacks recommended by the Commission.

Thank you,
James Slegers (he/him) / james.slegers@gmail.com / (651) - 366 - 2410

1153 Edmund

From: kesid@aol.com
To: [#CI-StPaul_Council](#); [CouncilHearing \(CI-StPaul\)](#)
Subject: Public Comment for City Council meeting 12/03/25 Item 42 - river building codes
Date: Monday, December 1, 2025 9:51:28 PM
Attachments: [Public Comment for 120325 Bird Safe Codes_KS.pdf](#)
[Public Comment for 120325 Bird Safe Codes_KS.docx](#)

Some people who received this message don't often get email from kesid@aol.com. [Learn why this is important](#)

Think Before You Click: This email originated **outside** our organization.

I attached my public comments in case I can't stay late enough at the meeting to speak in person. Plus they are more like 3 minutes instead of two minutes long.

I attached them in both Word and pdf versions.

Thanks for taking public comments on this important issue.

Kathy Sidles

Public Comment for Item 42 Public Comment for Saint Paul City Council Meeting on December 3, 2025 – MRCCA (Mississippi River Corridor Critical Area) – rules for Bird Safe Glass

From Kathy Sidles, kesid@aol.com, 1380 Winchell St., Saint Paul, MN 55106 , 651-233-6804 (cell, texts OK)

On October 7 and October 9 of 2022, for an hour early in the morning, I volunteered to look for dead birds around buildings at Mears Park as part of a world-wide week-long survey of birds killed by windows during migration. Each time I found three dead birds on the sidewalk.

Jerry Bahls with Minneapolis Bird Alliance recruited some of us in Saint Paul Bird Alliance to help survey areas over here.

We used protocols and a mapper app developed by Global Bird Rescue. You can see my data and everyone else's at their Mapper web site: <https://www.birdmapper.org/pages/explore-the-map>

I see from the map that during this week of bird migration 34 dead birds were found in downtown Saint Paul, though I don't know by how many volunteers.

I was in grade school in the 1960s when my town sprayed DDT out of trucks to try to kill the Dutch Elm beetles. That didn't work but it did kill Robins – I remember seeing them dying on the streets as we walked to school. And yes, it was really fun to play in the spray coming out of the trucks! But of course not good for people either. So we solved that problem by banning DDT and finding resistant elms. And we can solve the problem of bird collisions with bird-safe lighting and glass.

My family had a Little Golden Book of birds around the house, and I have been a birder of sorts since then.

In my early 20s I lived in apartments in the older part of Des Moines. There were no parks left and few birds. So friends and I would set a date to drive out of town to walk in nature.

From my late twenties until mid-forties I lived in south Minneapolis near 35th and Cedar. Again, to get into nature, and away from airport noise at the closest lake, I would plan outings elsewhere with friends.

But living on the east side of Saint Paul for the last 25 years has been GREAT! I can walk to the Bruce Vento Bike Trail and Frost Lake Park – that and affordable housing drew us to the neighborhood. And to Lake Phalen – see my recent post about the Harlequin and other ducks at Lake Phalen this week, on the Saint Paul Bird Alliance web page. LOTS of birders made the trip over to our local lake this week to enjoy what us residents can see every day.

My previous two neighborhoods in Des Moines and Minneapolis had no parks, and had houses getting old all at once. In Des Moines boarded houses were broken into and left open, and I lived near them. In the Corcoran Neighborhood of Minneapolis I started seeing boarded houses as they all were getting old so started an Empty House Committee – lower income neighborhoods like Philips were getting attention and higher income neighborhoods had parks. But our low to moderate income neighborhood housing problems were being ignored.

Now my east side Saint Paul neighborhood is getting old, being built just after World War 2 in the 1940s and 1950s. So not only do we need to prevent boarded houses and the high social costs of neglected areas by helping with house fix up, but to compete with suburban living we also need to

keep and improve our parks – that are recycled for free by birds and pollinators that live in them when cared for.

This is also true for downtown Saint Paul, especially as a transition is made to a higher percent being residential.

Saint Paul is on the Mississippi Flyway for birds. If we become a leader as a Bird Friendly City, both downtown and in neighborhoods, we will be very attractive to a lot of new residents, and to people who want to live here through their life stages. A Bird Safe Building code is a big part sending the message that living in Saint Paul means living within and not instead of nature!

A lot of science has been done on Bird Safe Buildings, and there is help for cities who want a city-wide Bird Safe ordinance. I am not a building expert, but in just one evening of research on my laptop using Google I see that we could adopt Bird-safe building codes that are already in place for Minnesota State buildings called the B3 codes.

The American Bird Conservancy has developed methods for evaluating existing and new buildings for level of bird safe glass needed. To be LEED certified you would use these methods which include bird-safe lighting and some design standards to avoid bird “traps”. The American Bird Conservancy (ABC) web site says this about the Minnesota Code for our state buildings:

<https://abcbirds.org/strategies/legislations-ordinances-code/>

Minnesota (State), U.S.A. (2013)

Mandatory. Applies to state-owned new buildings and major renovations. Whole-building Threat Factors, which are analogous to the weighted average calculation for LEED Innovation Credit for Bird Collision Deterrence, are used to define requirements (non-critical sites = 45; critical sites = 15). Includes hazardous features and lighting. See especially pages 6-7 and 57-66.

Comments: Could be improved by removing the weighted calculations and critical/noncritical designations and mandating bird-friendly materials to 100 ft.

These same standards, with the suggested ABC improvement to 100 feet, should be used throughout Saint Paul, including the MRCCA building codes, to save our wonderful and helpful bird friends from collisions and to go a long way towards keeping our city housing recycled and in the long run social and money costs down.

Thank you for listening. I am sending these comments ahead of time since I may have to leave for another meeting before the Public Comment period on Wednesday.

Kathy Sidles

From: [Jenna Sadjadi](#)
To: [Catherine Zimmer](#)
Cc: [*CI-StPaul_Contact-Council](#)
Subject: RE: Bird safe glass ordinance
Date: Tuesday, December 2, 2025 12:03:39 PM
Attachments: [image001.png](#)

Hello Catherine – Thank you for your email. Council President Noecker asked that I get back to you.

Council President Noecker shares, “We are initiating a bird safe glass study which will guide the development of a future ordinance. I think it’s important to do the work necessary to make sure we craft the ordinance in the right way. Doing it separately from MRCCA will also allow us to apply it outside of MRCCA’s narrow boundaries.”

Your comment will be added to the public record for Ord 25-72 “Amending Chapters 60,61,68, and 72 of the Legislative Code pertaining to the Mississippi River Corridor Critical Area and the Flood Plain Management Overlay Districts.”

Jenna Sadjadi (she/they)
Executive Assistant to Council President Noecker
Saint Paul City Council - Ward 2
15 W Kellogg Blvd, Room 310B
Saint Paul, MN 55102
651-266-8620 | www.stpaul.gov/ward2



SAINT PAUL
MINNESOTA

From: Catherine Zimmer <CDZ1790@outlook.com>
Sent: Sunday, November 30, 2025 5:44 PM
To: #CI-StPaul_Ward2 <Ward2@ci.stpaul.mn.us>; #CI-StPaul_Ward4 <Ward4@ci.stpaul.mn.us>
Subject: Bird safe glass ordinance

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Think Before You Click: This email originated **outside** our organization.

Dear Council President Noecker and Councilmember Coleman,

In our lovely city of St. Paul, we have wonderful natural resources, including the mighty Mississippi River. The River provides life, for humans to drink, recreate and to enjoy the beauty of Nature. The River also provides life to the animals and plants that call it home, as the River also provides water, food, habitat, protection and guidance for migrating

birds.

As you know, about 50% of North America's birds migrate along the Mississippi River corridor. The River corridor provides a route for numerous birds and numerous bird species that may only be seen here in St. Paul during migration. Birds' migrations are often long and very dangerous. The tiny Nashville Warbler, weighing less than a one ounce letter, migrates 2000 miles, a remarkable feat. During migration this little warbler and other birds encounter numerous obstacles including buildings/windows, power lines, lights that interrupt their navigation, cars, weather and loss of habitat in which to rest. We know that hundreds of millions of birds die due to the obstacles, e.g. buildings in their path. You may also know that North America has lost about \$30M birds in the past 50 years, e.g. during my lifetime.

Millions of Minnesotans consider themselves wildlife watchers and many watch birds. According to the US Fish & Wildlife Service's 2024 reports, 45% of the US population are wildlife watchers, 37% consider themselves birders. While most birders are white, 47% in the report identified as Asian Americans and approximately 24% are Black, Hispanic and other. Most birders make less than \$100K annually, with the bulk in the \$15K - \$99K range, and most bird near home. (1)

In terms of economic contributions, birders contribute significantly to the economy, the FWS value added number is over \$279B nationwide; a rough estimate of contributions to Minnesota, birding adds about \$6B to the state economy, county tax revenue was equal to \$7B and state tax revenue, over \$9B. In sum, more than one-third of the US population considers themselves birders, most are low-middle class and a significant percent are non-white.

The American Bird Conservancy has developed a list of North America's most vulnerable bird habitats; "Early successional, deciduous forest", the ecotype surrounding the River, is number 9 on the list. "Prairie potholes" and "Tallgrass Prairie", also important Minnesota ecotypes, are numbers 8 and 10 (2). These habitats are those most in need of conservation action, not just for birds, who are the proverbial "canaries in the coal mine", but for all the other species. In Minnesota, we have 2000 known, native species of wildlife that call it home, yet, 16% of those species are considered by MN DNR, "Species of Greatest Conservation Need".(3)

As you have heard from other residents and organizations, a number of other cities, including Minneapolis have bird safe building requirements. (4) Chicago, where a thousand migrating birds were killed, in one night, by the window glass of McCormack

Place along Lake Michigan, is working on a bird safe provisions.

Window collision victims, Oct. 4-5, 2023, Chicago.(5)



Birds and bird watching are important to St. Paul and Minnesota. Thousands if not millions of people in the Metro watch birds, most in their yards and neighborhoods. People of all races watch birds. Not only are there economic benefits, but human physical and mental health benefits. There is also a moral imperative, as we in St. Paul are keepers of the River.

With respect to St. Paul's bird safe ordinance, the current language was modified from the original and is now not sufficiently protective for birds. Please add the original language (below) back into the ordinance and pass it in full.

Addendum: Bird-friendly buildings language (January 2023 draft MRCCA ordinance) Sec. 68.248. Bird-safe glass.

(a) Bird-safe glass, with treatments to reduce bird collisions with the glass, must

be used on the first 70 feet above grade of new buildings and building additions as follows.

- 1) For building elevations comprised of 50% or more glass on any floor, at least 85% of the glass must be treated.
- 2) For building elevations comprised of less than 50% glass on any floor, at least 85% of glass areas of more than 50 square feet must be treated.
- 3) For glass areas of more than 50 square feet, any glass within 15 feet of a building corner must be treated.
- 4) All glass railings and glass on enclosed building connections must be treated.

(b) Bird-safe glass treatments may include the following:

- 1) Full surface glass treatment such as frosted glass or stained glass to make it visible;
- 2) Physical structures on the exterior of the glass such as grills and screens; and
- 3) Glass patterns visible from the outside such as white to medium gray permanent stencils, ceramic frit, and UV patterns visible to birds. To qualify as a bird-safe glass treatment, line patterns must have a minimum of ¼ inch wide lines and 2 inch on-center spacing, and dot patterns must have a minimum of ⅜ inch wide dots and 2 inch on center spacing each way.

Thank you for your support and vote to approve the amended ordinance. I look forward to your response, as well.

Sincerely,

Catherine Zimmer, MS
Environmental Health
1790 Hague Ave.
St. Paul, MN 55104

1. *Birding in the United States: A Demographic and Economic Analysis*.
<https://www.fws.gov/sites/default/files/documents/2024-11/2022-birding-in-the-us-demographic-and-economic-analysis.pdf>
2. American Bird Conservancy, Bird Conservation, *Keeping Watch*, Fall 2025.
3. MN DNR, *Minnesota's Wildlife Action Plan*,
<https://www.dnr.state.mn.us/mnwap/index.html>
4. [Minneapolis Code of Ordinances, Chapter 550, Article XV](#). (skyways)

5. Cornell Lab of Ornithology, *A Single Night of Bird Collisions in Chicago Points to the Need for Window Safety*, <https://www.allaboutbirds.org/news/a-single-night-of-bird-collisions-in-chicago-points-to-the-need-for-window-safety/>

From: [Allan Torstenson](#)
To: [*CI-StPaul Contact-Council](#); [CouncilHearing \(CI-StPaul\)](#)
Cc: [Allan Torstenson](#)
Subject: MRCCA Ordinance 25-72 Public Hearing Written Comments
Date: Tuesday, December 2, 2025 11:18:33 AM
Attachments: [MRCCA CC Ltr 12-2-25.pdf](#)

You don't often get email from allan.torstenson@gmail.com. [Learn why this is important](#)

Here are my written comments (attached) on MRCCA Ordinance 25-72 to be attached to the public record for Public Hearing Item 42 on the December 3, 2025, City Council meeting agenda.

1555 Branston Street
Saint Paul, MN 55108
2 December 2025

Saint Paul City Council
15 W Kellogg Boulevard
Saint Paul, MN 55102

RE: MRCCA Ordinance 25-72 – Comments on Vague UC District Height Standard

Dear President Noecker and Members of the City Council:

The good thing about the proposed amendment to replace objective structure height tiering language for the UC district with vague subjective language is that it may finally move the MRCCA ordinance toward adoption. It's otherwise a bad idea that will not achieve its apparent purpose of avoiding a public hearing for the RiversEdge project.

Clear objective language is a basic standard for a well-written zoning ordinance. Vague tiering language may be acceptable in state MRCCA Rules, but subjective language should be avoided as much as possible in city zoning regulations. That's why the DNR suggests replacing the vague tiering language with specific permitted height standards based on distance from the river.

Conditional use permits should be required for things that defy objective regulations. That's the purpose of conditional use permits. The CUP process is the standard, often used, best way to permit additional height where subjective review is needed. It's not onerous.

Without objective height language for the UC district under which most structures would be automatically approved for conformance with the MRCCA tiering requirement, and without a conditional use permit process for greater height, administration of the proposed vague UC district height language would be problematic. It's unreasonable and unrealistic to expect zoning administration staff to handle this without referring it to the Planning Commission for consideration as part of site plan review.

Site plan review is a Planning Commission function that has been delegated to the Zoning Administrator only for small projects that don't warrant a formal decision by the Planning Commission, don't have major impact on the surrounding area, and don't raise important policy issues. An application for variance of the MRCCA tiering requirement could be handled by the Planning Commission along with site plan review, at the same public hearing.

It's better to keep the objective structure height tiering language recommended by the Planning Commission to automatically approve most structures for conformance with the MRCCA tiering requirement, providing for a conditional use permit in the few cases greater height is proposed. It should not be replaced by vague subjective language.

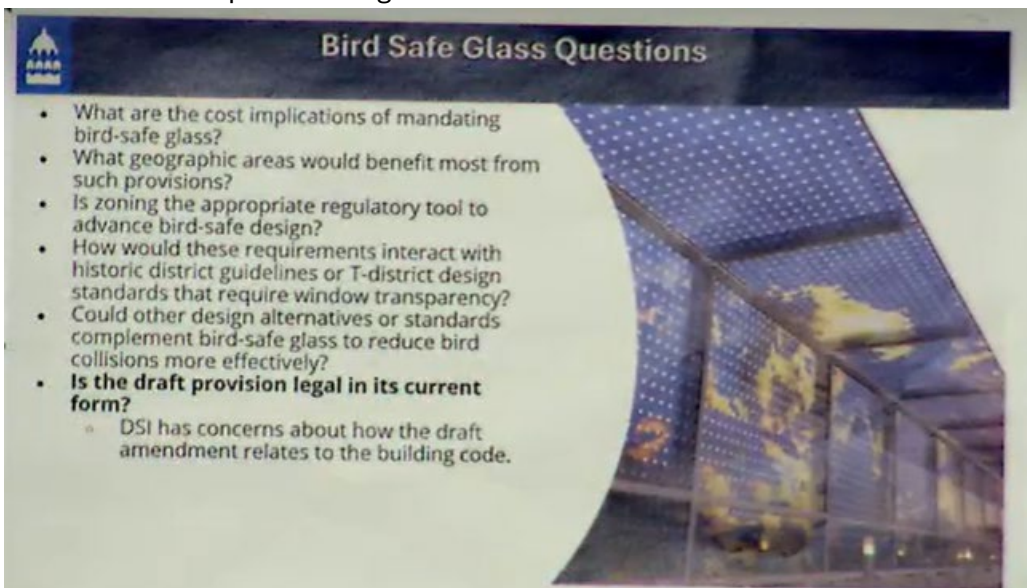
Allan Torstenson

allan.torstenson@gmail.com, 651-307-8393

From: Jenna Sadjadi
To: Catherine Zimmer
Cc: #CI-StPaul_Ward4; #CI-StPaul_Ward2
Subject: RE: Bird safe glass ordinance
Date: Wednesday, December 3, 2025 9:38:04 AM
Attachments: [image002.png](#)
[image003.png](#)

Hi Catherine – Thanks for your question. At last week’s public hearing, the scope of a study on bird-safe glass was described by Planning & Economic Development City Planner Tony Johnson (skip to 01:11 at https://stpaul.granicus.com/player/clip/5560?view_id=37&redirect=true). The questions included were described as follows:

- What are the cost implications of mandating bird-safe glass?
- What geographic areas would benefit most from such provisions?
- Is zoning the appropriate regulatory tool to advance bird-safe design?
- How would these requirements interact with historic district guidelines or T-district design standards that require window transparency?
- Could other design alternatives or standards complement bird-safe glass to reduce bird collisions more effectively?
- Is the draft provision legal in its current form?



Your comment will be shared with the Councilmembers and added to the public record for ORD 25-72.

Jenna Sadjadi (she/they)
Executive Assistant to Council President Noecker
Saint Paul City Council - Ward 2
15 W Kellogg Blvd, Room 310B
Saint Paul, MN 55102
651-266-8620 | www.stpaul.gov/ward2



SAINT PAUL
MINNESOTA

From: Catherine Zimmer <CDZ1790@outlook.com>
Sent: Tuesday, December 2, 2025 8:11 PM
To: Jenna Sadjadi <Jenna.Sadjadi@ci.stpaul.mn.us>; #CI-StPaul_Ward4 <Ward4@ci.stpaul.mn.us>
Subject: Re: Bird safe glass ordinance

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Think Before You Click: This email originated **outside** our organization.

Dear Jenna/President Noecker and Councilmember Coleman,

Thank you for your response to my comments regarding the bird safe building requirements.

There is some additional information I would like to share with you:

Cornell's Lab of Ornithology, one of the world's most respected bird authorities [notes](#) the Twin Cities is the SIXTH most dangerous for birds in terms of collision risk. This is due to both the vast number of birds that migrate through on the River flyway, on peak migration nights 45 Million birds pass through, and the high level of Artificial Light at Night (ALAN) here in the Twin Cities.

St. Paul's level of artificial light pollution is high. The [light pollution map](#) shows St. Paul sky brightness at 15-30 times higher than natural conditions, placing us in the highest category of urban light pollution. These levels of artificial light at night fall squarely within the range shown to alter migratory bird behavior, including attraction, disorientation, lowered flight altitude, and increased collision risk.(1) Nocturnally migrating birds are drawn toward urban light domes and show disrupted flight behavior under brightness levels comparable to those measured in St. Paul. St. Paul's measured sky brightness represents a level of ALAN known to adversely affect migratory birds.(2)

It is disappointing and saddening to learn protection of birds along St. Paul's portion of the Mississippi River flyway may be further delayed. The MRCCA has been in the city's hands for five years! The delays are inexcusable and now the city plans to further delay for a "study".

What questions do we expect to answer with a study?

Along with the information cited above, numerous studies of bird collisions with buildings/glass have been done. In Minneapolis, a [study](#) was conducted and published in 2020. The study assessed bird collisions with a number of downtown building types over four migration seasons. They found thousands of bird fatalities. The researchers reviewed building types, height, glass area and distance from the River to winnow down the most precarious situations. St. Paul's situation is similar and this study could be a surrogate for an additional St. Paul study.

Other studies have found bird deaths associated with buildings/glass collisions have likely been greatly underestimated. The [study](#) conducted by researchers from Fordham University and the New York Bird Alliance reviewed birds taken to wildlife rehabilitation centers after building/glass collisions. They found 60% of those birds died but also, the long term survival of the remaining 40% was unknown. The results of this study indicate bird deaths associated with building/glass collisions far exceed the current number of one billion birds annually.

I, and many St. Paul residents would like to suggest the city first determine what questions need to be answered with more studies. Then research the currently available data. It is likely current information would inform a bird protection ordinance similar to the one previously proposed. This would move us more rapidly to a resolution, saving taxpayer dollars, staff time and bird lives.

Again, thank you for your consideration. I look forward to your response.

Sincerely,
Catherine Zimmer, MS
Environmental Health
St. Paul, MN 55104

1. Ecology letters, *Artificial light at night confounds broad-scale habitat use by migrating birds*, <https://onlinelibrary.wiley.com/doi/10.1111/ele.12902>
2. Jeannine Thielen, personal communication, Minnesota Bird Coalition

From: Jenna Sadjadi <Jenna.Sadjadi@ci.stpaul.mn.us>
Sent: Tuesday, December 2, 2025 12:03 PM
To: Catherine Zimmer <CDZ1790@outlook.com>
Cc: *CI-StPaul_Contact-Council <Contact-Council@ci.stpaul.mn.us>
Subject: RE: Bird safe glass ordinance

Hello Catherine – Thank you for your email. Council President Noecker asked that I get back to you.

Council President Noecker shares, “We are initiating a bird safe glass study which will guide the development of a future ordinance. I think it’s important to do the work necessary to make sure we craft the ordinance in the right way. Doing it separately from MRCCA will also allow us to apply it outside of MRCCA’s narrow boundaries.”

Your comment will be added to the public record for Ord 25-72 “Amending Chapters 60,61,68, and 72 of the Legislative Code pertaining to the Mississippi River Corridor Critical Area and the Flood Plain Management Overlay Districts.”

Jenna Sadjadi (she/they)
Executive Assistant to Council President Noecker
Saint Paul City Council - Ward 2
15 W Kellogg Blvd, Room 310B
Saint Paul, MN 55102
651-266-8620 | www.stpaul.gov/ward2



SAINT PAUL
MINNESOTA

From: Catherine Zimmer <CDZ1790@outlook.com>
Sent: Sunday, November 30, 2025 5:44 PM
To: #CI-StPaul_Ward2 <Ward2@ci.stpaul.mn.us>; #CI-StPaul_Ward4 <Ward4@ci.stpaul.mn.us>
Subject: Bird safe glass ordinance

Some people who received this message don't often get email from cdz1790@outlook.com. [Learn why this is important](#)

Think Before You Click: This email originated **outside** our organization.

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As you know, about 50% of North America's birds migrate along the Mississippi River corridor. The River corridor provides a route for numerous birds and numerous bird species that may only be seen here in St. Paul during migration. Birds' migrations are often long and very dangerous. The tiny Nashville Warbler, weighing less than a one ounce letter, migrates 2000 miles, a remarkable feat. During migration this little warbler and other birds encounter numerous obstacles including buildings/windows, power lines, lights that interrupt their navigation, cars, weather and loss of habitat in which to rest. We know that hundreds of millions of birds die due to the obstacles, e.g. buildings in their path. You may also know that North America has lost about \$30M birds in the past 50 years, e.g. during my lifetime.

Millions of Minnesotans consider themselves wildlife watchers and many watch birds. According to the US Fish & Wildlife Service's 2024 reports, 45% of the US population are wildlife watchers, 37% consider themselves birders. While most birders are white, 47% in the report identified as Asian Americans and approximately 24% are Black, Hispanic and other. Most birders make less than \$100K annually, with the bulk in the \$15K - \$99K range, and most bird near home. (1)

In terms of economic contributions, birders contribute significantly to the economy, the FWS value added number is over \$279B nationwide; a rough estimate of contributions to Minnesota, birding adds about \$6B to the state economy, county tax revenue was equal to \$7B and state tax revenue, over \$9B. In sum, more than one-third of the US population considers themselves birders, most are lowe-middle class and a significant percent are non-white.

The American Bird Conservancy has developed a list of North America's most vulnerable bird habitats; "Early successional, deciduous forest", the ecotype surrounding the River, is number 9 on the list. "Prairie potholes" and "Tallgrass Prairie", also important Minnesota ecotypes, are numbers 8 and 10 (2). These habitats are those most in need of conservation action, not just for birds, who are the proverbial "canaries in the coal mine", but for all the other species. In Minnesota, we have 2000 known, native species of wildlife that call it home, yet, 16% of those species are considered by MN DNR, "Species of Greatest Conservation Need".(3)

As you have heard from other residents and organizations, a number of other cities, including Minneapolis have bird safe building requirements. (4) Chicago, where a thousand migrating birds were killed, in one night, by the window glass of McCormack Place along Lake Michigan, is working on a bird safe provisions.

Window collision victims, Oct. 4-5, 2023, Chicago.(5)

Birds and bird watching are important to St. Paul and Minnesota. Thousands if not millions of people in the Metro watch birds, most in their yards and neighborhoods. People of all races watch birds. Not only are there economic benefits, but human physical and mental health benefits. There is also a moral imperative, as we in St. Paul are keepers of the River.

With respect to St. Paul's bird safe ordinance, the current language was modified from the original and is now not sufficiently protective for birds. Please add the original language (below) back into the ordinance and pass it in full.

Addendum: Bird-friendly buildings language (January 2023 draft MRCCA ordinance) Sec. 68.248. Bird-safe glass.

(a) Bird-safe glass, with treatments to reduce bird collisions with the glass, must be used on the first 70 feet above grade of new buildings and building additions as follows.

- 1) For building elevations comprised of 50% or more glass on any floor, at least 85% of the glass must be treated.
- 2) For building elevations comprised of less than 50% glass on any floor, at least 85% of glass areas of more than 50 square feet must be treated.
- 3) For glass areas of more than 50 square feet, any glass within 15 feet of a building corner must be treated.
- 4) All glass railings and glass on enclosed building connections must be treated.

(b) Bird-safe glass treatments may include the following:

- 1) Full surface glass treatment such as frosted glass or stained glass to make it visible;
- 2) Physical structures on the exterior of the glass such as grills and screens; and
- 3) Glass patterns visible from the outside such as white to medium gray permanent stencils, ceramic frit, and UV patterns visible to birds. To qualify as a bird-safe glass treatment, line patterns must have a minimum of ¼ inch wide lines and 2 inch on-center spacing, and dot patterns must have a minimum of ⅜ inch wide dots and 2 inch on center spacing each way.

Thank you for your support and vote to approve the amended ordinance. I look forward to your response, as well.

Sincerely,

Catherine Zimmer, MS

Environmental Health

1790 Hague Ave.

St. Paul, MN 55104

1. *Birding in the United States: A Demographic and Economic Analysis*.
<https://www.fws.gov/sites/default/files/documents/2024-11/2022-birding-in-the-us-demographic-and-economic-analysis.pdf>
2. American Bird Conservancy, Bird Conservation, *Keeping Watch*, Fall 2025.

3. MN DNR, *Minnesota's Wildlife Action Plan*,
<https://www.dnr.state.mn.us/mnwap/index.html>
4. [Minneapolis Code of Ordinances, Chapter 550, Article XV](#). (skyways)
5. Cornell Lab of Ornithology, *A Single Night of Bird Collisions in Chicago Points to the Need for Window Safety*, <https://www.allaboutbirds.org/news/a-single-night-of-bird-collisions-in-chicago-points-to-the-need-for-window-safety/>