



## United States Department of the Interior

NATIONAL PARK SERVICE  
Mississippi National River and Recreation Area  
111 E. Kellogg Blvd., Suite 105  
St. Paul, Minnesota 55101-1256

IN REPLY REFER TO:

L3033

May 28, 2015

City of Saint Paul Planning Commission  
15 Kellogg Boulevard West  
St. Paul, MN 55102

RE: Shepard Development LLC - 1465 Davern Street - Variance Appeal

Dear Saint Paul City Council:

This letter is in regard to the appeal by the Friends of the Mississippi River of the 33.5 feet variance to building height at 1465 Davern Street that was approved by the Saint Paul Planning Commission on April 24<sup>th</sup>, 2015. The proposal is within the Mississippi National River and Recreation Area (MNRRA), a unit of the National Park Service, and the state Mississippi River Critical Area (MRCCA). The MNRRA was established in 1988 to protect and enhance the significant values of the Mississippi River corridor through the Twin Cities metropolitan area.

We support the appeal by FMR and respectfully request the City Council to grant the appeal and deny the variance. The Friends of the Mississippi River, the Friends of Shepard Davern, and the Minnesota Department of Natural Resources have submitted information, in addition to the comment letter that we addressed to the Saint Paul Planning Commission, exhibiting how the 73.5 feet mixed use development (1) is inconsistent with the Comprehensive Plan, (2) does not possess practical difficulties under Minnesota Statutes Section 462.357, subd. 6(2), and (3) will negatively alter the natural and historical characteristics of the Mississippi River corridor.

Each year the National Park Service and our partners conduct field trips on the Mississippi River for thousands of people. One program, Big River Journey, brings approximately 4,500 young students annually exploring the nature, heritage and stewardship of the river in the confluence area. The natural and historic landscapes are key elements of the student's experience. The views to and from the river allow students to come away with a sense of place and history. Incremental development that impedes the natural and historical landscape would impair the student's experience in addition to the resources of the river corridor and Saint Paul.

Thank you for consideration of our comments and continued preservation and enhancement of the Mississippi River. Attached is our previous comment letter addressed to the Saint Paul Planning Commission.

Sincerely,

for  
John O. Anfinson  
Superintendent