



*Working to protect the Mississippi River  
and its watershed in the Twin Cities area.*

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September 20, 2017

Councilmember Chris Tolbert  
310-C City Hall  
15 Kellogg Blvd. West  
Saint Paul, MN 55102

RE: Ford Site Zoning and Public Realm Plan

Councilmember Tolbert:

Friends of the Mississippi River (FMR) is a local non-profit community-based organization that works to protect and enhance the natural and cultural assets of the Mississippi River and its watershed in the Twin Cities. We have 2,400 active members, and more than 5,000 annual volunteers and program participants who care deeply about the river's unique resources. FMR has been an active and ongoing participant in planning for the future of the river in Saint Paul and more specifically, for the last 10 years, the Ford site.

Overall FMR is very supportive of the vision for the site and many aspects of the Plan. We strongly support the higher density, transit-friendly, mixed-use vision for the site and greatly appreciate the emphasis and care that has been given to sustainability, especially with respect to powering the new development with renewable energy.

One feature of the Plan we want to applaud is the linear stormwater feature/pond and associated open space, which we believe will help to fulfill the principles of having open space serve multiple functions and provide an interconnected greenway as a central feature of the site. The orientation of the water feature leading toward Hidden Falls will draw people toward the park and the proposed Mississippi River Boulevard bridge over the "creek" will enhance the integration of this feature with the natural falls. The integration of stormwater features, bike/ped-only streets, a greenway and traditional parkland will make the site more livable and attractive to both new residents and nearby neighbors.

We have also been impressed by and are grateful for the cooperation and patience demonstrated by planning staff, specifically Merritt Clapp-Smith and Mike Richardson. As we have worked with them over the past 10 years to understand the complex issues related to this site, they have been consistently willing to listen to our arguments and to entertain our requests for more information. They represent the City with distinction.

While there is much to like about this Plan there are two remaining aspects that we believe have not yet been sufficiently addressed. They are: 1) **Parks and open space** and; 2) **Building height limits to protect scenic views**. The Ford site is, of course, located in a very unique and special place, on the bluffs of the great Mississippi River along the only gorge on its entire length. The river confers great value to the site, but that value also requires that we bear responsibility to ensure that the public values of the site are protected. Setting aside additional public parkland on the river bluff and protecting our world-class scenic views within the gorge are absolutely essential, if we truly want to create a development that lives up to the project's vision to *"balance economic, social and environmental sustainability in a way that conserves and improves the qualities and characteristics of the unique Highland Park neighborhood and Mississippi River valley."*

### **Parks and Open Space**

We are disappointed that despite almost universal support for setting aside more public parkland on the site, the draft Plan provides only 9% of the land area for parks. We propose that the City acquire some of Ford's property at the southern end of the site to expand the existing bluff top park and realign Mississippi River Boulevard to the east. This proposal would create a larger contiguous park riverward of Mississippi River Boulevard.

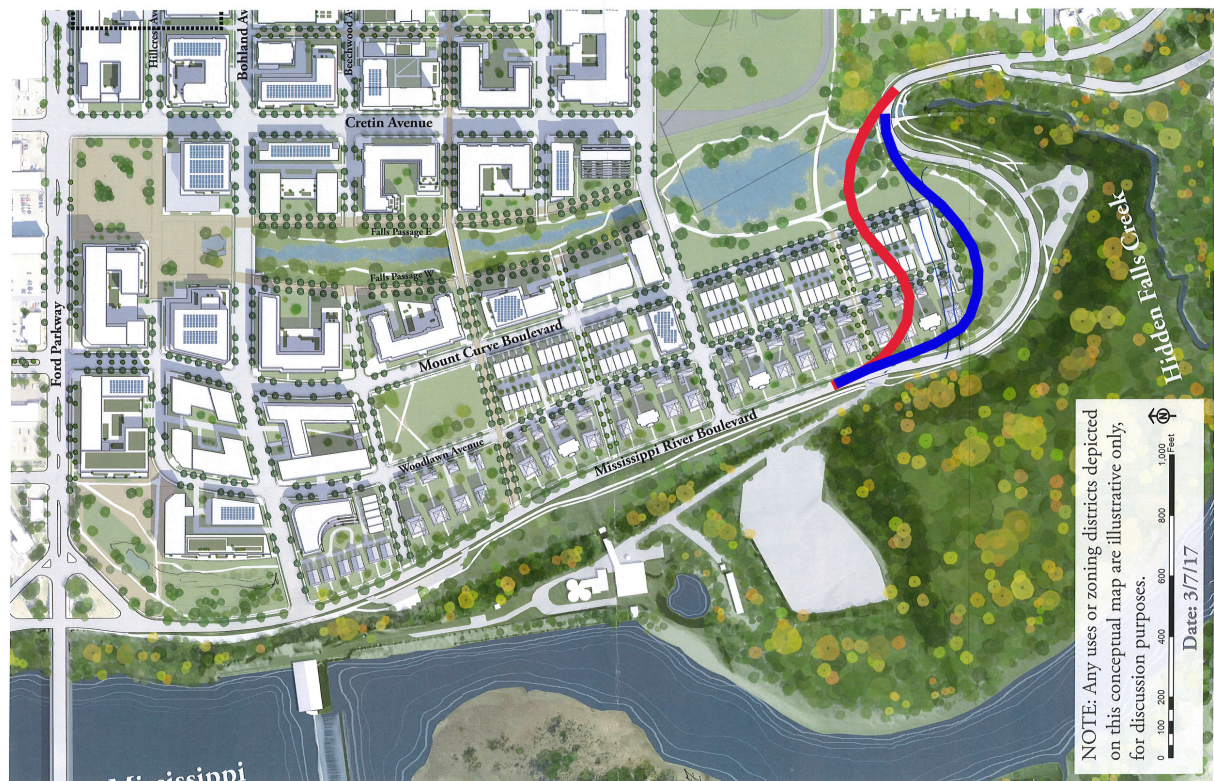
FMR staff served on the 2010 Ford Open Space Work Group and one of the guiding principles agreed to was that *"if higher acreages of open space can be attained, natural areas along the bluff should be expanded."* (Ford Site Open Space Guidelines). FMR believes this is a missed opportunity of the proposed Zoning and Public Realm Plan. The existing strip of parkland on top of the bluff and riverward of Mississippi River Boulevard is very narrow, leaving little room for park activities, overlooks, picnic facilities, etc. that new residents of the Ford site as well as other St. Paulites and regional visitors will certainly want and need.

Unlike the neighborhood parks that are part of this Plan, this expanded public parkland could be included within the redrawn boundary of the adjacent Hidden Falls Regional Park, which would make it eligible for Regional Park acquisition funds through the Metropolitan Council. An additional benefit of this proposal is that it would allow more of the City's park dedication acres to be used to increase neighborhood parks throughout the site, while increasing the overall public park acreage at the site.

Figure 1 (below) illustrates two possible realignments of Mississippi River Boulevard (MRB). In the blue realignment scenario, approximately 2.3 additional acres of parkland would be created at the bluff top and consolidated riverward of MRB. According to PED staff's estimate, this would mean that the City's park dedication acres could be reallocated to add approximately 1.4 acres of parks elsewhere in the site.

In the red realignment scenario, approximately 6.5 additional acres of parkland would be created at the bluff top and consolidated riverward of MRB. This would allow approximately 2.9 acres of parkland to be added elsewhere in the site using reallocated park dedication acres.

Figure 1



Since both the Ford Task Force and the Planning Commission supported this proposal, we are disappointed that the Plan does not show the realignment of MRB and the larger bluff top park. If this park expansion truly is a goal of the City, we believe it should be explicitly expressed in the Plan so that developers and the community understand this intention. The City's best opportunity to ensure additional parkland can be acquired is to include it in the public realm plan.

Furthermore, whether or not additional bluff top parkland can be created, the City should take this opportunity to reduce or relocate the existing parking lot that lies riverward of Mississippi River Boulevard. This is tremendously valuable parkland overlooking the scenic gorge. We believe it should not continue to be used for automobile parking. Relocating the parking lot would also have the benefit of eliminating the two driveway crossings of the bike trail — reducing potential conflicts between cyclists and cars.

There is only one Mississippi River and opportunities to add parkland along its bluffs do not present themselves every day. The City should not miss this chance to create a public-spirited amenity that will serve many generations of St. Paul residents and visitors.

### **Building Heights**

We appreciate the overall approach to building heights that will facilitate the protection of public river corridor views by prescribing that buildings are “tiered across the site starting with lower buildings on the west and moving steadily upward in height to the east.” This is consistent with Mississippi River Corridor Critical Area (MRCCA) rules, which require: “tiering of structures away from the Mississippi River and from blufflines...” in the River Towns and Crossings District and the Urban Mixed District. (Minn Rules §6106.0120).

We have been concerned that structure height limits in the Gateway and Residential Mixed Low zoning districts are inconsistent with MRCCA standards for structure height. However, it is our understanding from communication with staff that it is the City’s intention to adopt building heights that *do* comply with the MRCCA standards as part of the required MRCCA overlay zoning, which will be addressed subsequent to the adoption of this Plan. We therefore withdraw this objection and look forward to working with the City on the MRCCA plan and ordinance.

Finally, we want to raise a concern about how the city code measures building height, which we believe may not be sufficient in the context of scenic viewshed protection within a National Park. FMR is not opposed to building heights that exceed the dimensional standard, provided the performance standard from the MRCCA rules (§6106.0120) is met—specifically that taller heights are permitted, provided the structure’s height is generally consistent with the mature treeline, where present and existing surrounding development, as viewed from the opposite shore of the river.

The current city code provides that building heights are measured “to the break line of mansard roofs; and to the average height between eaves and ridge for gable, gambrel and hip roofs.” (Sec. 60.203.B). Roof top mechanical equipment such as HVAC units, chimneys or solar panels are not included in the height of the building, which means that roof peaks and mechanical equipment could still be visible from the river, even when the buildings’ “official height” conforms to MRCCA performance standards.

To address this issue we urge the City to adopt, as part of its MRCCA overlay ordinance, a method of measuring building height to the highest actual point of the structure, including mechanical equipment.

We appreciate the opportunity to comment on the Zoning and Public Realm Plan and look forward to working with the City, neighbors, Ford and others to participate in the next phases of planning, and ultimately help shape the eventual redevelopment of the site.

Sincerely,

A handwritten signature in black ink, appearing to read "Whitney L. Clark". The signature is fluid and cursive, with the first name being the most prominent.

Whitney L. Clark  
Executive Director