



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

101 East Fifth Street
Suite 2000
Saint Paul, MN 55101

651-222-2193
www.fmr.org
info@fmr.org

April 18, 2019

Betsy Reveal, Chair
City of Saint Paul Planning Commission
Saint Paul, MN 55102

Re: Comments on the Mississippi River Corridor Critical Area Plan, a chapter of St. Paul's 2040 Comprehensive Plan.

Dear Chair Reveal,

Friends of the Mississippi River (FMR) is a local non-profit organization that works to protect, restore and enhance the Mississippi River and its watershed in the Twin Cities metropolitan region. We have more than 2,700 active members, 3,500 volunteers and 2,000 advocates who care deeply about the river's unique resources.

FMR takes an active interest in working with municipalities, counties, state government, and other stakeholders to help shape and influence decisions that impact the health of the river. FMR was founded and continues to play a leadership role in ensuring that the public resources of our National Park —the Mississippi National River and Recreation Area (MNRRA), are preserved for current and future generations to benefit from.

FMR has been working with the city of Saint Paul and other stakeholders for many years to restore and revitalize the Mississippi River Corridor. We appreciate that city staff met with FMR and provided us with an opportunity to comment on the draft MRCCA Plan before it was released to the public. A number of our comments and concerns were addressed through revisions to the final draft plan, and some were not. For example, city staff expanded the MRCCA Plan policies in response to our suggestions, and we are pleased to see a more robust set of policies to address resource protection. These stronger policies will provide a solid foundation for the regulations that will be included in St. Paul's MRCCA ordinance.

We have valued opportunities to work in partnership with the city, and we look forward to continuing to have a productive relationship with city staff and leadership moving forward. As such, we respectfully submit the following comments regarding the Draft Mississippi River Corridor Critical Area Plan for the City of Saint Paul.

MRCCA Districts and Development Conflicts

In our earlier comments we pointed out the plan needed to fulfill the following plan requirement:

“Explain how future land uses (and potential redevelopment plans) fit the purpose of the MRCCA districts and identify potential conflicts.” -- MRCCA Districts Requirements document, Metropolitan Council Local Planning Handbook

The revised plan discusses four locations within the corridor with potential conflicts between the MRCCA Districts, the Future Land Use districts and/or zoning: the Ford site, Shepard-Davern, West Side Flats and Pig’s Eye. The sites/areas identified here are planning development that will revitalize the river corridor with new residents and businesses, but the city needs to balance that with ensuring the river’s natural resources, public access and scenic views are not negatively impacted by new development.

The narrative on page 220 of St. Paul’s MRCCA plan states the following:

“These are areas where Saint Paul may pursue flexibility in building height and/or district designation in the MRCCA ordinance.”

This statement concerns us. The establishment of the MRCCA districts was an extensive process that included input from a broad range of stakeholders, including many St. Paul residents. Furthermore, MRCCA rules include the following provision:

*6106.0400 Subp. 4. **Conflicting standards.** In case of a conflict between this chapter and any other rule or ordinance, the more protective provision applies.*

We recommend revising the narrative on page 220 of St. Paul’s MRCCA Plan as suggested below.

“These are areas where Saint Paul will need to strike a balance between the economic and social benefits of redevelopment and the natural, cultural and recreational resources of the Mississippi River. The city will utilize the criteria provided in the MRCCA rules to evaluate potential visual impacts of additional height, and if/when mitigation is needed. In some cases the city may pursue flexibility in building height and/or district designation in the MRCCA ordinance.”

The plan already includes several policies that provide a strong foundation for this approach, including:

Policy CA-1. Guide land use and development activities consistent with the management purpose of each of the MRCCA districts.

Policy CA-2. Protect Primary Conservation Areas through planning, land use and land alteration regulations, and other tools.

Policy CA-3. Minimize impacts to PCAs from public and private development and land use activities.

Policy CA-10. Regulate building height, placement and design consistent with the intent of the MRCCA rules to protect, enhance and minimize impacts to Public River Corridor Views.

Policy CA-11. Protect and minimize impacts to PRCVs from public development activities.

Policy CA-12. Consider designated Public River Corridor Views from other communities in developing dimensional standards, view impact evaluation procedures, and mitigation identification procedures.

Policy CA-13. Support shorter buildings closer to the river's edge and taller buildings as distance from the river increases in order to maximize views of and from the river, and preserve visual access to the river as a public good (rather than privatized right).

St. Paul's Unique River Resources

In our earlier comments, we suggested the plan should identify and describe river resources, especially those that are specific or unique to St. Paul. Some descriptive language was added to the introductory narrative for several sections of the plan, but most of our suggested additions (provided below) were not included.

Although the MRCCA rules are quite prescriptive, there will be developers seeking variances and conditional use permits. The rules also provide guidance for municipalities to make decisions about these discretionary actions (MRCCA Rules 6106.0800), but most of those provisions, including mitigation, are based on protection of resources identified in the city's MRCCA plan.

The City needs to anticipate potential threats to these key resources and make sure that the MRCCA Plan includes the tools needed to address those issues should they arise.

We recommend adding the following information to the plan or its appendices

- Identify specific regional parks, trails, overlooks, marinas and landings by name, along with a brief description that highlights key resources and recreational assets within each park. For example, a description of Indian Mounds Regional Park could highlight walking trails with spectacular urban views, large natural woodlands and planted prairies, and historically significant Native American burial mounds.
- Identify the names and/or places of specific resources within the corridor, such as lakes (Crosby, Pickerel, Pig's Eye, etc.), tributaries and waterfalls.
- Identify names and/or places of existing wetlands and their general condition general type/condition (healthy degraded, restored, etc.)

- Identify names and/or places of existing forests, woodlands and prairies and their general type/condition (healthy degraded, restored, etc.)
- Identify and describe the significance of the Mississippi Gorge
- Identify and describe primary and secondary bluffs, where they intersect with developed areas (such as Highwood) and where views of the bluffs are especially significant (such as Gorge, West Side Flats, Indian Mounds)
- Identify general condition of public river shoreline, especially where it is in need of repair or erosion control.

Public River Corridor Views

The city did a nice job on this section. It includes a list of 46 Public River Corridor Views (PRCVs) and the descriptions are helpful. In our earlier comments we identified 7 additional viewpoints we think should be included. Only one of those suggestions (view from Pike Island, or Bdote) was added to the final draft. Although the city's list of views is robust, there are some sites within the valley and at the river's edge that were overlooked and we'd like to see them included in the city's inventory of PRCVs.

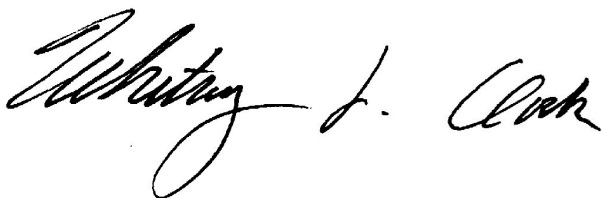
Some additional St. Paul views for your consideration:

- View from Pike Island looking up towards the Shepard-Davern site
- View from Pike Island towards Watergate Marina/Crosby Farm
- View from Crosby Farm along the river trail
- Harriet Island – view from south entrance through floodwall
- Harriet Island – view from Kelly's landing
- View from Vento Sanctuary towards the river valley
- View from Bayfield Street, past Holman Field

Thank you again for the opportunity to comment on the city's draft MRCCA plan. We appreciate the constructive relationship between St. Paul and FMR and that you value and respect our input.

If you have additional questions or wish to discuss the content of this letter, please don't hesitate to contact us.

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