

401 N Robert Street, Suite 150
St. Paul, MN 55101

May 2, 2025

Kristine Grill, Chair
15 Kellogg Blvd. West
Saint Paul, MN 55102

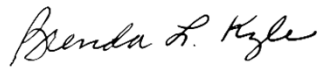
Dear Chair Grill and Planning Commissioners:

On behalf of the 1600+ members and affiliates of the St. Paul Area Chamber, thank you for the opportunity to comment on the proposed River Corridor and Floodplain Overlay Zoning Amendments. I respectfully ask that you support the staff's recommendations for height requirements in the Urban Core District of the Mississippi River Critical Corridor Area (MRCCA).

Exciting efforts are underway to revitalize downtown St. Paul and reconnect the city to its riverfront. The recommendations proposed by city staff represent an opportunity to support that momentum. By allowing appropriately scaled development along the river corridor, Saint Paul can expand its housing options, attract new investment, and increase its tax base.

Significant vision, planning, and investment are being directed toward downtown's future. Retaining the proposed height requirements in the Urban Core District ensures that projects can continue to be reviewed against the goals of the comprehensive plan, while advancing shared objectives for economic vitality, sustainability, and public access to the river. At a time when Saint Paul urgently needs more housing and increased property tax value, delaying or restricting development in this area would undermine progress at a critical moment.

Respectfully,



B Kyle
President & CEO
St. Paul Area Chamber





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 clearer standards for building heights and exceptions.”

Signed by 155 St. Paul residents

Craig Adams
St. Paul, MN 55106

Cindy Adamson
St. Paul, MN 55116

Joe Adcock
St. Paul, MN 55108

Deb Alper
St. Paul, MN 55105

Lucille Altemus
St. Paul, MN 55106

Laura Angell
St. Paul, MN 55116

Dan Becker
St. Paul, MN 55116

Theresa Beckhusen
St. Paul, MN 55104

Sara Beckstrand
St. Paul, MN 55116

Monica Bierma
St. Paul, MN 55101

Lois Bjorlie
St. Paul, MN 55102

Brent Boehner
St. Paul, MN 55107

Colleen Bollom
St. Paul, MN 55105

Martha Boyd
St. Paul, MN 55119

Stefani Brand
St. Paul, MN 55116

Clif Brittain
St. Paul, MN 55105

Linda Brooks
St. Paul, MN 55101

Ada Brown
St. Paul, MN 55108

Deborah Brown
St. Paul, MN 55105

Judith Brown
St. Paul, MN 55102

Terry Brueck
St. Paul, MN 55105

Arianna Bryant
St. Paul, MN 55106

Kelsey Carignan
St. Paul, MN 55108

Sandra Carlin
St. Paul, MN 55104

Elizabeth Carls
St. Paul, MN 55108

Lydia Caros
St. Paul, MN 55116

Mike Cassidy
St. Paul, MN 55102

Beth Chiang
St. Paul, MN 55116

Whitney Clark
St. Paul, MN 55105

Joan Cochran
St. Paul, MN 55105

Julie Comine
St. Paul, MN 55105

Mary Conlin-Warner
St. Paul, MN 55116

Sam Courtright
St. Paul, MN 55116

Matthew Crellin
St. Paul, MN 55105

Rashon Cryer
St. Paul, MN 55106

Kathy Cumming
St. Paul, MN 55116

Michael Custard
St. Paul, MN 55101

Luke Darger
St. Paul, MN 55116

Sara DeKok
St. Paul, MN 55105

Maria DeLaundreau
St. Paul, MN 55104

David DeLong
St. Paul, MN 55108

Martha Douglas
St. Paul, MN 55102

Iain Dove McAfee
St. Paul, MN 55104

Joe Downes
St. Paul, MN 55105

Meg Duhr
St. Paul, MN 55102

Virginia Dunivan
St. Paul, MN 55105

Julia Earl
St. Paul, MN 55105

Catherine Early
St. Paul, MN 55117

Sarah Emrick
St. Paul, MN 55116

K. Feilmeyer
St. Paul, MN 55105

Adam Flett
St. Paul, MN 55108

Philip Friedlund
St. Paul, MN 55102

Karen Gasche
St. Paul, MN 55108

Gita Ghei
St. Paul, MN 55103

Mark Gilbert
St. Paul, MN 55105

Vincent Graziano
St. Paul, MN 55104

Coleen Gregor
St. Paul, MN 55105

Arjun Guneratne
St. Paul, MN 55116

Meredith Gunlicks-Stoessel
St. Paul, MN 55108

Gayl Gustafson
St. Paul, MN 55106

Carla Hagen
St. Paul, MN 55105

Karina Hanson
St. Paul, MN 55108

Louisa Harstad
St. Paul, MN 55104

Anne Henly
St. Paul, MN 55104

Liz Henrich
St. Paul, MN 55105

Margaret Hogan
St. Paul, MN 55105

Colleen Holm
St. Paul, MN 55116

Frank Jossi
St. Paul, MN 55116

Winston Kaehler
St. Paul, MN 55105

Deborah Katz
St. Paul, MN 55116

Maureen Kenney
St. Paul, MN 55104

Donald Kist
St. Paul, MN 55105

Barbara Klussendorf
St. Paul, MN 55116

Kurt Klussendorf
St. Paul, MN 55116

Leah Kodner
St. Paul, MN 55117

Lee Korthof
St. Paul, MN 55107

Dan Krivit
St. Paul, MN 55116

Susan Lamoureux
St. Paul, MN 55105

Jeanne Landkamer
St. Paul, MN 55104

Susan Lauries
St. Paul, MN 55116

Peter Leete
St. Paul, MN 55114

Julia Leone
St. Paul, MN 55117

Fran Lesicko
St. Paul, MN 55105

Mary Jeanne Levitt
St. Paul, MN 55105

Lori Lifto
St. Paul, MN 55101

Cindy Lorah
St. Paul, MN 55116

Sara Lovat
St. Paul, MN 55108

Anne Lowe
St. Paul, MN 55105

Joyce Lyon
St. Paul, MN 55108

Marsha Macey
St. Paul, MN 55105

Mark MacGregor
St. Paul, MN 55102

Michelle MacGregor
St. Paul, MN 55102

Elan Majkrzak
St. Paul, MN 55116

Judith Marshall
St. Paul, MN 55104

Todd Marshall
St. Paul, MN 55104

Char Mason
St. Paul, MN 55116

Carol McCarty
St. Paul, MN 55116

Julia McColley
St. Paul, MN 55102

Barbara McEiver
St. Paul, MN 55105

Cynthia McKeen
St. Paul, MN 55102

Lori McLaren
St. Paul, MN 55107

Bill McMahon
St. Paul, MN 55116

Debbie Meister
St. Paul, MN 55104

Patricia Merwin
St. Paul, MN 55105

Hokan Miller
St. Paul, MN 55107

Penny Miller
St. Paul, MN 55107

Camille Morse Nicholson
St. Paul, MN 55107

Mark Neuman-Scott
St. Paul, MN 55101

Wendy Neurer
St. Paul, MN 55116

Scot Nortrom
St. Paul, MN 55105

Kathryn Nuernberger
St. Paul, MN 55104

G P
St. Paul, MN 55104

Jenn P
St. Paul, MN 55116

Joan Pasiuk
St. Paul, MN 55105

Karen Peterson
St. Paul, MN 55116

Jennifer Pierson
St. Paul, MN 55116

Danielle Porter Lucero
St. Paul, MN 55105

Cora Preston
St. Paul, MN 55104

Susan Price
St. Paul, MN 55104

Jane Prince
St. Paul, MN 55106

Jean Rivard
St. Paul, MN 55106

Kris Robison
St. Paul, MN 55104

Jessica Rootes
St. Paul, MN 55106

Elaine Rosner
St. Paul, MN 55119

Sonja S
St. Paul, MN 55101

Mary Saul
St. Paul, MN 55116

Ann Schley
St. Paul, MN 55119

Linda Schloff
St. Paul, MN 55101

Beatrice Schneider
St. Paul, MN 55105

Greg Schneider
St. Paul, MN 55105

Bobbie Scott
St. Paul, MN 55119

Julian Sellers
St. Paul, MN 55105

Kailey Smith
St. Paul, MN 55116

Laurie Sovell
St. Paul, MN 55107

Sarah Stevenson
St. Paul, MN 55116

Mark Stewart
St. Paul, MN 55105

Phlaurel Strand-Crawford
St. Paul, MN 55107

Sammy Strootman
St. Paul, MN 55104

Gabriela Sweet
St. Paul, MN 55102

Liesl Taylor
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Michael Thomsen
St. Paul, MN 55105

Joe Tillotson
St. Paul, MN 55102

Joan Toohey
St. Paul, MN 55105

Timothy Twohy
St. Paul, MN 55104

Michele Vaillancourt
St. Paul, MN 55105

Amy Verhoeven
St. Paul, MN 55104

Heidi Wachter
St. Paul, MN 55104

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St. Paul, MN 55101

Leah Weston
St. Paul, MN 55108

Mary Willis
St. Paul, MN 55102

Mike Willis
St. Paul, MN 55104

Susan Willis
St. Paul, MN 55104

Tiffany Wortman
St. Paul, MN 55105

Therese Zemlin
St. Paul, MN 55117



West 7th / Fort Road Federation

395 Superior Street

Saint Paul, MN 55102

651.298.5599

www.FortRoadFederation.org

April 10, 2025

Planning Commission, City of Saint Paul
c/o Tony Johnson
City Hall Annex
25 West 4th Street, Suite 1400
Saint Paul, MN 55102

Sent via email: MRCCA@ci.stpaul.mn.us

Subject: MRCCA Ordinance Public Comment - West 7th/Fort Road Federation

Dear Mr. Johnson and Planning Commissioners,

The West 7th/Fort Road Federation appreciates the opportunity to comment on the 2025 draft of the Mississippi River Corridor Critical Area (MRCCA) ordinance. Our neighborhood has a deep connection to the river — culturally, historically, and environmentally — and we are committed to thoughtful stewardship of this unique landscape.

We respectfully urge the City to strengthen the draft ordinance by reintroducing key provisions from the January 2023 draft that supported environmental protection, equitable development, and greater clarity for both residents and developers. Specifically, we support the following recommendations:

Include Bird-Friendly Building Requirements

The Mississippi River flyway is one of the most important migratory routes in North America, and the urban corridor sees hundreds of species annually. Simple and cost-effective design standards — such as bird-safe glass and smart lighting — can prevent millions of bird deaths. We support reinstating the clear specifications included in the 2023 draft and aligning Saint Paul's policy with the state's existing B3 Guidelines for public buildings. This is an urgent, science-based action to protect biodiversity.

Clarify Height Limits and Reinstate Tiering Standards

The shift away from specific height and tiering language in the 2025 draft introduces unnecessary ambiguity. Reinstating clear height limits and tiered development — especially in the Urban Mixed (UM) and River Towns and Crossings (RTC) districts — will safeguard the visual connection between our neighborhood and the river, reduce conflict in the planning process, and ensure compliance with state rules.

Require Clear Findings for Variances and Conditional Use Permits (CUPs)

The Federation urges the City to reintroduce the DNR's recommended language requiring specific written findings of fact for variances and CUPs. These provide transparency, help ensure decisions reflect the impact on river resources, and create consistency. Utilizing the DNR's recommended language allows for clarity and predictability for all involved.

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.

Protect the Bdote Area and Blufftop Views Along Shepard Road

The Bdote area holds profound cultural and spiritual significance for the Dakota people and is a cherished natural asset for many Minnesotans. In West 7th, the blufftop corridor along Shepard Road is particularly vulnerable to development that could severely impact views, cultural landscapes, and public access to nature. We strongly recommend more restrictive height limits or the creation of subdistricts that prohibit CUPs for increased height in this area.

The MRCCA ordinance is an opportunity to guide riverfront development in a way that reflects our community's values. Our Federation stands for a vibrant, inclusive, and livable West 7th neighborhood — one that remains deeply connected to the river. We ask you to lead thoughtfully by strengthening this ordinance.

Thank you for your consideration and continued commitment to the Mississippi River Corridor and the communities who live along it. We appreciate the opportunity to weigh in on this matter.

Sincerely,

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

Julia McColley
Executive Director

CC: Rebecca Noecker, Council President



*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

April 17, 2025

Dear Planning Commissioners:

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.

Unfortunately, we're disappointed by St. Paul's proposed MRCCA ordinance. The city's prior draft (January 2023) was much clearer and provided better guidelines to balance urban development with ecological protection. We urge St. Paul to reinstate some of the key provisions (included at the end of this letter) from the prior draft.

Recommendation: bird-friendly buildings

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.

An important way to balance density with wildlife protection is to require bird-friendly lighting and building materials in all new development along the river. **The state of Minnesota already incorporates such specifications into its B3 Guidelines for state-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 and lighting specifications (Addendum 1) were included in the January 2023 draft; public response to this proposal was enthusiastic.

Recommendation: clearer criteria for variances and conditional use permits (CUPs)

St. Paul's ordinance should include the DNR's recommended language regarding specific written findings of fact for variances and CUPs. St. Paul's prior draft ordinance included this requirement (Addendum 2), but the updated draft removes it.

In our experience, requested exceptions to these rules — especially in river areas beloved by the community — can be challenging for a planning commission and council. The DNR's recommended language about written findings offers more specific criteria for evaluating a request based on its impact on river resources and scenic views. This provides **more clarity and predictability for developers and community members**.

Nearly all of the 24 other cities that have completed their MRCCA ordinances have included this DNR-recommended language.

Recommendation: clearer building height and tiering requirements

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.”

It's up to cities to actualize this building tiering requirement. St. Paul's 2023 draft ordinance addressed this more clearly than any other city's by specifying a direct relationship between distance from the shoreline and allowable height in these districts (Addendum 3). We recommend adopting this language for the UM and RTC height districts, with the understanding that the UC district in downtown may require a different approach due to the complexities of developing the RiversEdge site (former Ramsey County Jail) at the edge of the bluff.

The current draft removes these numeric standards in favor of more subjective ones, which seem **tailor-made to spark conflicts** between developers, neighbors, the city, and the DNR because they are now much more open to each party's interpretation.

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.

Recommendation: protect views in the Bdote area

The Bdote area near the confluence of the Minnesota and Mississippi rivers is special. It is sacred to Dakota people. It is also treasured by many others who flock to the city and state parks in the area. The nature-dominated views in this area should be protected and enhanced.

Excessively visible buildings at the top of the bluff would damage to this special place. The area along Shepard Road between W. 7th St. and 35E is particularly vulnerable to this possibility given the likelihood for redevelopment of some blufftop sites over the coming years.

Currently, much of this area is in the in the Urban Mixed (UM) or the River Towns and Crossings (RTC) districts discussed above, with no upper limit on additional height allowed by CUP. The city should create policies to protect this area; these could include creating subdistricts with more tailored height limits and/or prohibiting any CUPs for increased building height above the MRCCA limit. The clearer CUP criteria recommended above may also accomplish this goal.

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 and last names being more prominent.

Colleen O'Connor Toberman
Land Use & Planning Director

Addendum 1: Bird-friendly buildings language (January 2023 draft)

Sec. 68.247. Exterior lighting.

Lighting shall be fully shielded and directed downward, except as reasonably necessary for transportation safety, emergency and motion-activated security lighting, athletic fields, and outdoor recreation and entertainment facilities. Uplighting is prohibited.

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.

Addendum 2: Variance and CUP criteria (January 2023 draft)

Sec. 68.223. Variances.

Variances to the requirements under this article may only be granted in accordance with Minnesota Statutes, Section 462.357. The board of zoning appeals or planning commission shall evaluate consider the potential impacts of variances on primary conservation areas, public river corridor views, and other resources identified in the MRCCA plan, and in addition to the requirements in section 61.601 of this code shall make written findings that the variance is consistent with the purpose of this article as follows:

- (a) The extent, location and intensity of the variance will be in substantial compliance with the MRCCA Plan.
- (b) The variance is consistent with the character and management purpose of the MRCCA district.
- (c) The variance will not be detrimental to primary conservation areas or public river corridor views.

Sec. 68.224. Conditional and interim use permits.

All conditional use permits required under this article must comply with Minnesota Statutes, section 462.3595. All interim use permits must comply with Minnesota Statutes, section 462.3597. The

planning commission or city council shall evaluate consider the potential impacts on primary conservation areas, public river corridor views, and other resources identified in the MRCCA plan, and in addition to all other requirements for conditional and interim use permits shall make written findings that the use is consistent with the purpose of this article as follows:

- (a) The extent, location and intensity of the use will be in substantial compliance with the MRCCA Plan.
- (b) The use is consistent with the character and management purpose of the MRCCA district.
- (c) The use will not be detrimental to primary conservation areas or public river corridor views.

Addendum 3: Building tiering requirements for RTC and UM districts (January 2023 draft)

Sec. 68.234. Structure height.

Structures and facilities must comply with the following maximum height standards unless identified as exempt in division 9. Height is measured on the side of the structure facing the Mississippi River. All of the following height standards, including additional height allowed with a conditional use permit, are subject to the requirement that structure design and placement minimize interference with public river corridor views.

(a) ROS District: 35 feet.

(b) RN District: 35 feet.

(c) RTC District: 35 feet at the district boundary line closest to the river plus 1 foot for every 10 feet the structure or portion of the structure is set back from said boundary line, to a maximum of 48 feet. Additional height, to a maximum of 65 feet, may be permitted with a conditional use permit according to section 68.235.

(d) SR District: Height is determined by underlying zoning, provided the allowed height is consistent with that of the mature treeline, where present, and existing surrounding development as viewed from the OHWL of the opposite shore.

(e) UM District: 35 feet at the river shoreline and blufflines plus 1 foot for every 5 feet the structure or portion of the structure is set back from the river shoreline or bluffline, to a maximum of 65 feet. Additional height, to a maximum of 90 feet, may be permitted with a conditional use permit according to section 68.235.



Saint Paul Bird Alliance



Photographer: David Keener

Greetings to Members and Friends

Our name has changed but our mission has not! Your generosity continues to support our **mission** of engaging a diverse community in enjoying, understanding, and protecting birds and the habitats all living beings need to thrive. We engage your passion for birds through programs and field trips, preserve and restore habitat through advocacy and conservation, and support local nonprofits to expand our reach in the community.

2024 Highlights

- Enjoyed birding with more than **693** people attending **46** field trips.
- Featured **9** experts talking about birds and the natural world in our Speakers Series.
- Introduced **1,598** 4th-grade students to birding through the Big River and Wild River Journeys.
- Awarded **\$8,854** in grants to **5** nonprofits that align with our mission and values.
- Sponsored **20** members of the Urban Bird Collective to attend Warbler Weekend.
- Registered **15** teams for the 2023 Christmas Bird Count.



Photographer: Janet Bauer

We Hope You Join Us!

Saint Paul Bird Alliance (formerly Saint Paul Audubon Society) **welcomes everyone** to participate in our activities and events regardless of race, color, national origin, age, gender, sexual orientation, or marital status. We **do not require membership** for you to enjoy our many programs.

Become a Chapter Member

We invite you to become a **Saint Paul Bird Alliance Chapter Member** by making an annual gift of \$25 or more. Your donation goes directly to our local efforts to enjoy, understand, and protect our birds. This includes:

- Making grants to local organizations focused on conservation, education, and environmental action.
- Bringing speakers to our monthly chapter meetings (Sept-May) that educate and excite our passion for birds and the environment.
- Creating and supplying educational opportunities for students.
- Supporting critical community science activities.
- Protecting at-risk bird species through habitat restoration and special projects.
- Providing fun and informative field trips.



Photographer: Peter Waksmundzki

The generosity of Chapter Members is recognized in our online annual report, which also has more information about the year's outcomes.



Get involved

Join other members and friends on field trips, Warbler Weekend, Christmas Bird Count, and monthly programs. Volunteer for a project or join a committee. Check the Events page on our website.



Keep in touch

Sign up to receive emails and the *Cardinal* newsletter by visiting saintpaulbirdalliance.org

Join our Facebook group and check out our YouTube Channel.





Saint Paul Bird Alliance

Bird-Friendly Building Policies in Selected Cities

Research shows that building collisions are killing significantly more birds than previously estimated—well over one billion annually in the United States alone. This has contributed to a 29% decline in North American bird populations since 1970. As a result of this serious threat, more than two dozen cities, counties and states have adopted bird-friendly building standards over the last two decades.

The table below compares mandatory bird-friendly building policies for eight cities ranging in population size from 8 million to 23,000.

City (Year Enacted / Population)	Name	What structures does the policy apply to?	What portion of each structure must be “bird-friendly”?
New York City (2019) (pop. 8.3 million)	Local Law 15 of 2020: Bird-Friendly Building Design	All new buildings in the City of New York, from houses to skyscrapers. Includes auxiliary structures and includes requirements for hazardous features.	“Must use ≥90% bird-friendly materials in the first 75 ft. above grade. Materials other than bird friendly materials shall not exceed an aggregate of 10 sq. ft. feet within any 10 ft. by 10 ft. square area of exterior wall below 75 ft. above grade.”
Washington DC (2023) (pop. 678,972)	D.C. Law 24-337. Migratory Local Wildlife Protection Act of 2022	New construction, renovations involving the replacement of >75% of exterior glazing, and bird-hazard installations for commercial buildings, multi-unit residential buildings, institutional facilities, or District-owned or operated buildings.	Each façade of the exterior wall envelope and any exterior fenestration must be constructed with bird friendly materials up to 100 ft. above grade. Other materials may be used to the extent that they do not exceed an aggregate of 10 sq. ft. within any 10 ft. by 10 ft. sq. area of exterior wall below 100 ft. above grade.
Minneapolis, MN (2016) (pop. 425,115)	Minneapolis Code of Ordinances, Chapter 550, Article XV "Skyways"	New skyways	>85% of all glazing on new skyways must be bird-friendly.

Madison, WI (2020) (pop. 280,305)	Madison General Ordinance § 28.129	1) all buildings or structures >10,000 sq. ft. (measured in total floor area on above-grade stories); 2) sky-bridges (elevated pedestrian pathways connecting buildings); and 3) at-grade glass features, such as sound walls and glass screens. The law also applies to the expansion of these same existing structures.	For buildings of >10,000 sq. ft. with facades comprising 50% or more glass on the first 60 ft. above grade must use bird-friendly treatments on at least 85% of the glass. Additionally, all glass within 15 ft. of a building corner must be treated "when see-through or fly-through conditions exist." For buildings >10,000 sq. ft. with <50% glass on the first 60 ft. above grade, bird-friendly treatments must be installed on at least 85% of continuous or closely placed "glass areas" that are 50 sq. ft. or larger and on all such "glass areas" over 50 sq. ft. within 15 ft. of a building corner. Additionally, all "glass railings" on buildings >10,000 sq. ft. must be treated, along with all glass on "enclosed building connections" from grade to 60 ft.
Berkeley, CA (2023) (pop. 118,962)	Ordinance No. 7,864-N.S.: Bird Safe Building: Adding Berkeley Municipal Code Section 23.304.150	All new non-residential buildings, existing non-residential buildings when glass is replaced up to 75 feet above grade, high-risk features, e.g. skywalks railings, glass walls, railings; new mixed use or residential buildings of >= 10,000 sq. ft. Affordable housing and historic structures are exempted. Includes some "phase-ins."	100% of glass must be treated up to 75 ft above grade. 100% of high-risk features, regardless of grade must be treated.
Mountain View, CA (2017) (pop. 81,785)	North Bayshore Area Precise Plan, sec. 5.2 "Bird Safe Design"	All North Bayshore Area new buildings, additions, and alterations north of Highway 101. Includes hazardous building features.	>90% of facades up to 60 ft. above grade must meet bird-safe design standards.

Portland, ME (2024) (pop 69,104)	Amendment to Portland City Code Chapter 6, Bird Friendly Building and Design Requirements	New buildings or additions to buildings of $\geq 10,000$ sq. ft. in floor area; renovations of existing buildings of $\geq 10,000$ sq. ft. in floor area in which at least 50% of the building's exterior glazing is being replaced within a period of three years; and bird hazard installations, which includes but is not limited to skywalks, awnings, glass railings and guards, and windscreens. Residential buildings, operable sash windows, historic landmarks, and ground floor glazing of retail, bars, and restaurants are exempted.	Building facades up to 75 ft. above grade must be constructed with bird-friendly materials. Non bird-friendly materials may be used as long as they do not exceed 10 sq. ft. in aggregate in any 100 sq. ft. area. Bird hazard installations must be constructed with 100% bird-friendly materials, regardless of their height above grade. Fly-through building elements -- including parallel glass elements at a distance of 17 ft. or less and all glass within 15 ft. of a building corner -- must be constructed with bird-friendly materials up to 75 ft. above grade. Building facades adjacent to green roofs must be constructed with bird-friendly materials up to 12 ft. above the roof surface.
Middleton WI (2020) (pop. 22,967)	City of Middleton Zoning Ordinance, Article VI: Performance Standards, Section 10.06.34 Glare and Heat Standards	Buildings of $> 10,000$ sq. ft. of floor area, and all sky-bridges (up to 60 ft. above grade), sound walls, or glass screens on buildings of any size.	For building facades where the first 60 ft. from grade are comprised of $\geq 50\%$ glass, 85% of glass and all glass within 15 ft. of corner fly-through conditions must be treated. For building facades where the first 60 ft. from grade are comprised of $< 50\%$ glass, at least 85% of glass on glass areas 50 sq. ft. or larger must be treated and all glass within 15 ft. of corner fly-through conditions must be treated. Sky bridges, sound walls, glass railings, or glass screens must be 100% treated. Spandrel or opaque glass with $< 14\%$ reflectivity is not included in the glass area calculation.

Source: The Yale Bird-Friendly Building Initiative: [Comparison of U.S. Bird-Friendly Building Policies](#) (Dec. 2024), at bird-friendly.yale.edu/usa-policy-database.

Contact: Kiki Sonnen, St. Paul Bird Alliance, kikisonnen@gmail.com.

1555 Branston Street
Saint Paul, MN 55108
2 May 2025

Kristine Grill, Chair
Saint Paul Planning Commission
1400 City Hall Annex
25 West Fourth Street
Saint Paul, MN 55102

RE: Comments on Mississippi River Corridor Critical Area Zoning Study

Dear Commissioner Grill and Members of the Planning Commission:

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

Definitions

Tiering

Rather than having a definition for *tiering* in the definitions section of the ordinance, state MRCCA Rules and the DNR's model MRCCA ordinance define *tiering* right in the section of the Rules and model ordinance where it's used. The section on structure height permits maximum heights for the RTC, UM and UC districts subject to prioritizing:

"tiering of structures away from the Mississippi River and blufflines, ... with lower structure heights closer to the river and blufflines."

It's best practice for a well-written code to define or clarify the meaning of a term right where it's used in the text when it's only used in one place. This eliminates the need to look up a definition somewhere else to understand the meaning of a term, making the code easier to use and understand, and this is what should be done for *tiering* in the MRCCA ordinance.

In the newly updated draft St. Paul ordinance, language about tiering of structures away from the Mississippi River and blufflines, with lower structure heights closer to the river and blufflines, is missing from Sec. 68.234, *Structure height*. It's replaced with an incorrect new definition for *tiering* in the definitions section that conflates *tiering* with separate requirements for preservation of *public river corridor views* and doesn't mention the requirements for tiering of structures away from the river and blufflines. Requirements for preservation of *public river corridor views* apply only to a few specific defined places. Tiering requirements apply more broadly. They are two different things.

American Planning Association standards and conventions for zoning code definitions note that reading the substantive portions of the ordinance should be adequate to determine the applicable regulations. The sentence in the proposed new definition for *tiering* about where to find strategies for prioritizing tiering is not definition language and does not belong in the definition.

The incorrect new definition for tiering should be deleted from the definitions section. Language about tiering structures away from the river and bluffs, with lower structure heights closer to the river and bluffs, needs to be put back into Sec. 68.234, *Structure height*.

Public river corridor views

MRCCA Rules define *public river corridor views* as “views toward the river from public parkland, historic properties, and public overlooks, as well as toward bluffs from the ordinary high water level of the opposite shore, as seen during the summer months.” To make requirements for minimizing interference with public river corridor views easier to administer, the DNR has provided for clarification of what they are in the MRCCA plan, and the DNR’s model MRCCA ordinance adds the clarifying phrase “and documented in the MRCCA plan/chapter of the comprehensive plan” at the end of the definition.

In the newly updated draft ordinance, the MRCCA Rules definition of *public river corridor views* is missing. All that remains is the clarifying phrase. To be clear and accurate about what *public river corridor views* are, the definition needs to include both the MRCCA Rules definition and the clarifying phrase, as in the DNR’s model ordinance:

Public river corridor views. Views toward the river from public parkland, historic properties, and public overlooks, as well as toward bluffs from the ordinary high water level of the opposite shore, as seen during the summer months and documented in the MRCCA plan/chapter of the comprehensive plan.

Overlay district

The sentence in the definition of *overlay district* about where they are often used is not definition language and should be removed so the definition is clear and simple:

Overlay district. A zoning district applied over one or more previously established zoning districts, establishing additional or stricter standards and criteria for covered properties in addition to those of the underlying zoning district.

Tiering Requirements

MRCCA Rules apply tiering requirements only to structures in the RTC, UM and UC districts, *not* in the ROS, RN and SR districts. The newly updated draft ordinance deletes clear language about this in Sec. 68.234, *Structure height*. In a new Sec. 68.235, *Site plan review standards for tiering*, the updated ordinance simply refers generally to MRCCA Rules requirements for tiering without saying where and how they apply. Rather than making users refer to a separate document for this core MRCCA requirement, clear language about where and how tiering requirements apply should be contained right in the MRCCA ordinance. The best way to do this is to have a sentence about tiering requirements in the first paragraph of Sec. 68.234, *Structure height*, like the sentence there about the requirement for structure design and placement to minimize interference with public river corridor views, as follows:

Sec. 68.234. Structure height.

Structures and facilities must comply with the following maximum height standards unless identified as exempt in division 9. All the following height standards, including additional height with a conditional use permit, are subject to the requirement that structure design and placement minimize interference with public river corridor views. All the following height standards for the RTC, UM and UC districts, including additional height with a conditional use permit, are subject to the requirement that tiering of structures away from the Mississippi River and blufflines, with lower structure heights closer to the river and blufflines, is prioritized.

Conditional Use Permit for Additional Height

In the first paragraph of Sec. 68.236, *Conditional use permit for additional height*, change “shall” to “must.” MRCCA Rules and the DNR’s model MRCCA ordinance use *must*, which is correct. The legal community has a strong preference for use of “must” as the clearest way to express a requirement or obligation in code language, confirmed by CAO staff when this has come up before. The need for this correction in several other places was identified in a March 4 email to Tony and Josh.

In Sec. 68.236(b), cite the requirements in Sec. 68.234 above rather than Minnesota Rules Part 6106.0120 for tiering of structures, and change the first *or* to *and* so it reads as follows:

- (b) Determination that the proposed structure is consistent with the requirements in section 68.234 for tiering of structures, through building design and generally lower heights for structures and sections of structures closer to the river or bluffline.

The requirements in Sec. 68.234 above and in Minnesota Rules Part 6106.0120 for tiering of structures are the same. Having them in Sec. 68.234 eliminates the need to refer to a separate

document for this core MRCCA requirement, making the code easier to use and understand. If structure heights are not at least *generally* lower closer the river and blufflines it's not tiering. What does the newly added phrase "with consideration of topography" mean? It's unclear and unnecessary, so it may be best to leave it out. Simpler is generally better.

The second sentence in Sec. 68.236 (b) is more related to Sec. 68.236(c) and has been modified to be slightly inconsistent with the language for this in MRCCA Rules and the DNR's model MRCCA ordinance. It should be slightly edited for consistency with MRCCA Rules and moved to Sec. 68.236(c) as follows:

- (c) Identification and application of building design and other techniques, such as those identified in section 68.235, to minimize the perceived bulk of the proposed structure and impact on public river corridor views.

Public river corridor views are defined and don't need to be defined again here.

In Sec. 68.236 (d) there's a missing s in the word *views*.

Site Plan Review Standards for Tiering and Preservation of Public River Corridor Views

The newly updated draft ordinance adds a new Sec. 68.235 that provides standards and criteria for certifying site plan conformance with the requirements in Sec. 68.234 for tiering and for minimizing interference with public river corridor views. This should be reflected in the title and introductory sentence of this section as follows. *Plan* and *review* in the title should start with a lower-case p and a lower-case r.

Sec. 68.235. Site plan review standards for tiering and preservation of public river corridor views.

In addition to the site plan review requirements of section 61.402, criteria for certifying site plan conformance with the requirements in Sec. 68.234 for tiering and for minimizing interference with public river corridor views must include the following:

Split Sec. 68.235 (c) into two parts, like Sec. 68.236(b) and (c), and correct the punctuation and wording in (d)(1), as follows:

- (c) Determination that the proposed structure is consistent with the requirements in section 68.234 for tiering of structures, through building design and generally lower heights for structures and sections of structures closer to the river or bluffline.
- (d) Identification and application of building design and other techniques to minimize the perceived bulk of the proposed structure and impact on public river corridor views, such as:

- (1) Using site design techniques, such as having the building relate to the natural topography, screening the building with established tree canopy, and orienting the building to align the narrowest facades with public river corridor views;

American Planning Association guidelines for well-written zoning ordinances say that vague language should be avoided both to deter legal challenges and to make the ordinance a practical guide to what is permitted and not permitted. It also simplifies administration of the ordinance and saves time for everyone. A statement in the cover memo for the MRCCA ordinance about the intent to create predictability in our development process is consistent with this. For all of these reasons, the DNR's model ordinance suggests replacing the vague tiering language for the RTC, UM and UC districts with specific permitted height standards based on distance from the river. There was a proposal for this, and allowing additional height with a conditional use permit, as follows.

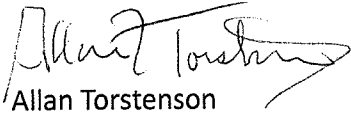
RTC District: 35 feet at the district boundary line closest to the river plus 1 foot for every 10 feet the structure or portion of the structure is set back from said boundary line.

UM District: 35 feet at the river shoreline and blufflines plus 1 foot for every 5 feet the structure or portion of the structure is set back from the river shoreline or bluffline.

UC District: 35 feet at the river shoreline plus 1 foot for every 5 feet the structure or portion of the structure is set back from the river shoreline.

Maximum height in the ROS and RN districts is 35 feet, a reasonable place to start at the river shoreline. There are required setbacks from the river and blufflines, and greater height would be allowed by right at the required setback lines and go up from there. This would allow almost all development by right and eliminate the need for subjective staff decisions for tiering conformance. The conditional use permit process is set up for more subjective Planning Commission review and approval of additional height. This optional language is not included in the newly updated draft ordinance. It would be reasonable for the Planning Commission to recommend including this optional language or something like it.

Sincerely,



Allan Torstenson

allan.torstenson@gmail.com

651-307-8393

From: [Wendy Neurer](#)
To: [*CI-StPaul_MRCCA](#)
Subject: Approve the original 2023 language for MRCCA ordinance
Date: Friday, May 2, 2025 6:54:31 PM

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

City Planning Commission

My name is Wendy Neurer and I am a long time resident of St. Paul. I am writing to voice my support for the original 2023 St. Paul draft for the Mississippi River Corridor Critical Area (MRCCA) ordinance. This original document has specific language that secures height restrictions of structures enforced to 34 feet, and other restrictions without vague text to allow waivers for height exceptions as in the newer watered down version .

This ordinance was written over 7 years ago with the architect being a highly respected senior manager, with decades of expertise in PED working with several city managers along with community organizations . He for the most part duplicated Minneapolis MRCCA ordinance which was implemented over 4 years ago.

The Director of PED and the Mayor have stalled the passage of the ordinance for over 5 years favoring wealthy developers verses protecting the River Corridor including birds. This has enabled any developer to build structures of 50 feet high.

Paster Organization is one of the developers whose approved site plan includes a 93 luxury units apartments along with a pool and dog run on the River Corridor in Highland Park 706 Mississippi River Boulevard. PED granted them approval 3 years ago, knowing that this 34 feet height restriction would be passed. They recently extended the permit until April 2026, even though no building work has taken place. The Mayor and PED stalling the approval of MRCCA for years is encouraging this oversized building to take place. This should be halted immediately. Enforce gentle density along the corridor.

The Mighty Mississippi River Corridor is a national jewel that needs to be protected . The River does not belong to the city, it is a sacred land for all to enjoy it's magestic view, habitat, wild life and splendor. That is why the state's priority has been to preserve the pristine view to be here for generations to come.

Reasonable Height restrictions of 34 feet on all future developements allow the beautiful view to be here for all who visit and travel along the river; on bikes, walking paths or drive the scenic road. It is a tourist attraction . Stop allowing property on this corridor to build more than 34 feet tall. The view becomes tarnished.

This was land originally designed by the park system to build structures that fit and enhance the integrity of this jewel.

Please Act NOW!

Sincerely,
Wendy Neurer
711 Woodlawn Ave
St. Paul, MN 55116

From: colleenh512@comcast.net
To: [*CI-StPaul_MRCCA](#)
Subject: MRCCA
Date: Friday, May 2, 2025 5:01:58 PM

You don't often get email from colleenh512@comcast.net. [Learn why this is important](#)

Commissioners,

I am writing to request the 2023 amendment draft that were removed from the current draft be returned.

I specifically ask that the bird-safe building requirements be added back and more flexibility for building heights along the downtown riverfront. Language should be precise and remove any vagueness to decrease possibilities of further lawsuits.

Thank you for your consierations.

Colleen M Holm
1966 Beechwood Ave
St Paul MN 55116

St Paul resident since 1980

From: [Kiki Sonnen](#)
To: [Tony Johnson](#)
Subject: Mississippi River Corridor Critical Area
Date: Wednesday, April 30, 2025 8:15:45 PM

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

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

Saint Paul Bird Alliance
PO Box 7275
St Paul MN. 55107

Dear Planning Commissioners,

Saint Paul Bird Alliance is working with Friends of the Mississippi River, other environmentalists, and community leaders to improve bird safety measures and the quality of the environment in our River Corridor Critical Area.

As you may know, St. Paul has 17 miles of River coastline- the most of any other city in the entire stretch of the Mississippi.

The Mississippi River Flyway has 40% of all the migrating birds in North America. Other Flyways in North America are the Central Plains, Pacific Coast and the Atlantic Coast. Bird migration happens twice a year - in the Spring and in the Fall. We are in the early stage of Spring Migration now. In the overnight of April 29, 2025 radar shows 146,600 birds flew across Ramsey County. Many of them hug the River Corridor since the Mississippi is an easy landmark for birds to follow. Migrants usually fly at night because the winds tend to be calmer. Birds also rely on stars and magnetic fields to help them on their way. You can watch the migrations too. Just Google Birdcast. This is a program run by Cornell Lab of Ornithology, with support from NASA, weather radar programs, and foundation grants.

As stewards of the Mississippi River, St Paul needs to protect our birds, whether year-round residents or passing migrants. One way to do this is to require bird safe glass in new construction in the River Corridor. Our zoning ordinance can also be improved to provide bird and pollinator friendly landscaping, lighting safe for birds, shoreline protection, certain setbacks to protect bluff top views, building heights and density requirements to preserve sweeping views of the Mississippi.

At the Planning Commission's Zoning Committee meeting on March 12, an issue was brought up that bird safe building codes should be applied city-wide , not just in the River Corridor zone. We agree the code should be citywide. But we also know that this was the tactic used in Minneapolis to kill the bird safety measures in their River Corridor ordinance.

So we think that now that the River Critical Area Zoning is finally back before you, it is a good time to start with bird safety measures in the River Corridor first. Then it will be shown the new zoning laws work just fine. Later we can expand it city-wide.

At the hearing I will have a chart of bird friendly building policies in other cities including New York City, Washington DC, Madison WI, Berkeley CA, Mountain View CA, Portland ME, Middleton WI. Note that Minneapolis zoning code now requires bird safety measures in new skyways.

Bird safe buildings are now required throughout Minnesota when projects utilize state bonding funds. Case studies indicate that bird-friendly glass costs less than 1% of total project costs.

The City of St Paul itself has celebrated the use of bird-safe glass in new projects like the North End Community Center and the new Hamline Branch Library.

Bird-safe glass in buildings is the wave of the future. We urge you to embrace the new wave.

A closing note about the Saint Paul Bird Alliance's mission to engage diverse community to enjoy, understand, and protect birds and the habitats all living things need to thrive. We serve primarily Ramsey and Washington counties. We provide free nature-related events throughout the year. We welcome everyone and do not require membership to participate. We welcome your involvement.

Sincerely,

Kiki Sonnen, Vice President

Saint Paul Bird Alliance

Tony Johnson

From: goodgrowsmb@everyactioncustom.com on behalf of Martha Boyd
<goodgrowsmb@everyactioncustom.com>
Sent: Friday, May 2, 2025 11:22 AM
To: Tony Johnson
Subject: I am writing to you today regarding a very important issue

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

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

Dear St. Paul City Planner Tony Johnson,

Hi CM Yang and Ward 6 Team,

I love birds! This time of year, my walks around the Greater East Side neighborhood and nearby nature spots are slower to see who is here - the feathered visitors that we only see during spring and fall migration, the new babies hatching, the flirting and feeding on new insects and fish. It's a magical time! - but also dangerous for birds coming through populated areas.

Investments now are critical to protect humans and our ecological life support systems into the future. Please insist on re-instating bird-safe provisions in planning and development ordinances. If we skip the chance to build safe for birds, green for people and wildlife, and resilient for our future NOW, we lose that opportunity for another 50 years or more! This is about longterm planning and real return on investment, not shorter term "cost reduction" at the behest of a small group of developers who want us to think those savings will be passed along.

As you know, I moved here from Chicago, where several groups and policy actions aim to protect birds from hitting building windows and dying - or receiving injuries that prevent them from living in the wild. Chicago's McCormick Place conference center on Lake Michigan finally invested in window modifications, leading to reduced bird deaths. McCormick Place is now using that as part of their own marketing. For more info see:

- <https://www.mccormickplace.com/birds/>

- <https://www.allaboutbirds.org/news/bird-collisions-window-safety-mccormick-place-chicago/>

The organization "Chicago Bird Collision Monitors" has links on their website to information about bird-safe buildings and more about protecting birds. They do great work:

- <https://www.birdmonitors.net/Examples.php>

Here in the Twin Cities, 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.

Thank you!

Martha

Sincerely,

Ms. Martha Boyd

Saint Paul, MN 55119-4810

From: [Mary Ann Berglund](#)
To: [*CI-StPaul_MRCCA](#)
Subject: Approve the original language for MRCCA ordinance
Date: Monday, May 5, 2025 11:11:28 AM

You don't often get email from maberg2010@gmail.com. [Learn why this is important](#)

My name is Mary Ann Berglund. I am writing to urge you to support the original language for the 2023 MRCCA ordinance.

The Mississippi River Corridor is a precious resource for all of Minnesota. At a time when the federal administration is planning to diminish the beautiful natural areas of our country, we should be treasuring and protecting what we have in our city and state. I want my grandchildren to be able to appreciate and enjoy the wonderful beauty of nature here in St. Paul. I am confused as to why St. Paul hasn't passed an ordinance when all other Minnesota cities along the river have done so. Listen to the experts who have testified about the importance of maintaining this area.

Please keep the maximum height of buildings at 34 feet. Mandate the use of bird safe materials. My grandchildren and yours will thank you for having the foresight to preserve the Mississippi River Corridor for all to enjoy without the impediment of tall, unsightly buildings.

Once gone, the natural beauty cannot be brought back!

Mary Ann Berglund
968 Linwood Ave.
St. Paul, MN 55105

From: [Kurt Klussendorf](#)
To: [*CI-StPaul_MRCCA](#)
Subject: Proposed MRCCA ordinance testimony
Date: Saturday, May 3, 2025 3:51:41 PM

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

I am opposed to the current draft of the proposed MRCCA ordinance. There are a number of elements in the January 2023 draft that better protect the river and its viewshed for your citizens recreation and enjoyment.

o

- There should be clearer criteria for condition use permits and variances. Most cities have included the DNR's recommended language in their ordinances. Saint Paul should also use it.

Yours,
Kurt Klussendorf
699 Woodlawn Avenue
Saint Paul MN 55116

From: [Yasmine Robinson](#)
To: [Tony Johnson](#)
Subject: FW: MRCCA letter of concern
Date: Monday, March 24, 2025 9:04:27 AM
Attachments: [Mississippi River Flyway City Planner 31925.docx](#)

Good morning! Could you reply to Sharell and let her know when the PH is? Thank you!

From: Sharell Benson <sharellbenson@gmail.com>
Sent: Thursday, March 20, 2025 1:27 PM
To: Yasmine Robinson <Yasmine.Robinson@ci.stpaul.mn.us>
Subject: MRCCA letter of concern

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

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

Dear Yasmine Robinson,

My name is Sharell Benson and I am a resident of St. Paul. I am writing to share my support for the original St. Paul's draft Mississippi River Corridor Critical Area (MRCCA) ordinance and to urge the city to resume the public hearing process immediately. I support a stronger ordinance, the one from the original document that secures the height of structures enforced to 34 feet or less, not to be rewritten with any vague description to allow waivers for height exceptions.

Dear Saura Jost,

My name is Sharell Benson and I am a resident of St. Paul. I am writing to share my support for the original St. Paul's draft Mississippi River Corridor Critical Area (MRCCA) ordinance and to urge the city to resume the public hearing process immediately. I support a stronger ordinance, the one from the original document that secures the height of structures enforced to 34 feet or less, not to be rewritten with any vague description to allow waivers for height exceptions.

The Mississippi River Corridor is a national jewel that needs to be protected. The River does not belong to the city, it is part of the land for all to enjoy it's majestic view, habitat, wildlife and splendor. That is why the state wants its pristine view to be here for generations to come. Height restrictions on all future developments allow the view in all its beauty to stay what it is for all who visit and travel along it on bikes, walking paths or drive the scenic road for all generations now and in the future. The capital city should be a leader in preservation of all it's beauty by not selling property on this corridor to build more than 34 feet tall. The view becomes distorted with anything higher being built. This was land originally designed for the park system to only build structures that fit into the integrity of this jewel.

It is also imperative to retain bird safe building codes such as bird friendly lighting design, building design and building materials. Bird safe glass adds very little to the cost of new construction while providing proven benefits.

Thank you for your consideration. Please think sustainably and green to protect the land and wildlife. By paying attention to that, the river corridor will also be a better experience for people.

Sincerely,
Sharell Benson
1201 Edgcumbe Road
Saint Paul, MN 55105

The Mississippi River Corridor is a national jewel that needs to be protected. The River does not belong to the city, it is part of the land for all to enjoy it's majestic view, habitat, wildlife and splendor. That is why the state wants its pristine view to be here for generations to come. Height restrictions on all future developments allow the view in all its beauty to stay what it is for all who visit and travel along it on bikes, walking paths or drive the scenic road for all generations now and in the future. The capital city should be a leader in preservation of all it's beauty by not selling property on this corridor to build more than 34 feet tall. The view becomes distorted with anything higher being built. This was land originally designed for the park system to only build structures that fit into the integrity of this jewel.

It is also imperative to retain bird safe building codes such as bird friendly lighting design, building design and building materials. Bird safe glass adds very little to the cost of new construction while providing proven benefits.

Thank you for your consideration. Please think sustainably and green to protect the land and wildlife. By paying attention to that, the river corridor will also be a better experience for people.

Sincerely,
Sharell Benson
1201 Edgcumbe Road
Saint Paul, MN 55105

From: nickiweber02@everyactioncustom.com on behalf of [Nichole Weber](#)
To: [Tony Johnson](#)
Subject: I am writing to you today regarding a very important issue
Date: Tuesday, March 18, 2025 10:12:44 AM

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Dear St. Paul City Planner Tony Johnson,

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...

Sincerely,
Nichole Weber
Farmington, MN 55024-1483

From: leekorthof@everyactioncustom.com on behalf of [Lee Korthof](#)
To: [Tony Johnson](#)
Subject: I am writing to you today regarding a very important issue
Date: Tuesday, March 18, 2025 10:30:18 AM

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Dear St. Paul City Planner Tony Johnson,

I live on the bluff overlooking the River and downtown St Paul, I am an avid birder, I am creating a bird friendly/pollinator friendly yard. I am doing all I can to support wildlife in St Paul. Why would the City of St Paul not do the same? I encourage the City of St Paul, my council person, the planning department to make sure all planning documents contain safeguards for birds and wildlife especially for building projects along the River.

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 if you, the planning department of the City of St Paul, cannot protect a small bird, how can you be trusted to protect any living animal?

Sincerely,
Lee Korthof
Saint Paul, MN 55107-2157

From: jen.s.shaffer@everyactioncustom.com on behalf of [Jennifer Shaffer](#)
To: [Tony Johnson](#)
Subject: I am writing to you today regarding a very important issue
Date: Tuesday, March 18, 2025 10:50:26 AM

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Dear St. Paul City Planner Tony Johnson,

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 bird populations are struggling: up to 40% of the bird population has been lost since 1970, according to Audubon. We have the ability to slow down additional population loss by ensuring that migratory paths are clear and navigatable. Future generations will thank us, and I thank you for considering this conservation issue.

Sincerely,
Jennifer Shaffer
Minneapolis, MN 55401-2604

From: deb.a.brown@everyactioncustom.com on behalf of [Debbie Brown](#)
To: [Tony Johnson](#)
Subject: I am writing to you today regarding a very important issue
Date: Tuesday, March 18, 2025 11:15:39 AM

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

Dear St. Paul City Planner Tony Johnson,

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 I am a board member of the Saint Paul Bird Alliance (formerly St. Paul Audubon) and a leader on its conservation committee. I volunteer my time to advance science and protect vulnerable fellow creatures, including migrating birds. We are now in migration season, so this is very timely.

Sincerely,
Debbie Brown
Saint Paul, MN 55105-2520

From: mvaillancourt@everyactioncustom.com on behalf of [Michele Vaillancourt](#)
To: [Tony Johnson](#)
Subject: I am writing to you today regarding a very important issue
Date: Tuesday, March 18, 2025 11:24:44 AM

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

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

Dear St. Paul City Planner Tony Johnson,

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 I value the Mississippi River and the wildlife it supports. I have lived two blocks from the Mississippi River for over 40 years, and the River and its environment is one of the principal reasons we chose to live here. Please support rational and science-based regulations on bird-safe glass and height restrictions for new construction to protect the Mississippi River.

Thank you.

--Michele Vaillancourt

Sincerely,
Michele Vaillancourt
Saint Paul, MN 55105-1228

From: activist.6vss1@everyactioncustom.com on behalf of [Katherine Dugarm](#)
To: [Tony Johnson](#)
Subject: I am writing to you today regarding a very important issue
Date: Tuesday, March 18, 2025 12:56:55 PM

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

Dear St. Paul City Planner Tony Johnson,

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 I enjoy walking along Mississippi River Boulevard at the top of the bluff and seeing treetops and the river. I also enjoy walking in Hidden Falls Park at river level and identifying birds I see and hear, as well as seeing the river at that level. We need an ordinance based on science and not who has the most money.

Sincerely,
Katherine Dugarm
Saint Paul, MN 55116-2560

From: s_peddicord@everyactioncustom.com on behalf of [S peddicord](#)
To: [Tony Johnson](#)
Subject: I am writing to you today regarding a very important issue
Date: Tuesday, March 18, 2025 1:08:25 PM

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

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

Dear St. Paul City Planner Tony Johnson,

WHY IS THIS NOT BEING CONSIDERED!?!?!? PASS MRCCA ORDINANCE INCLUDING BIRD SAFE BUILDING STANDARDS!!!! CRAZY! 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. 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...

Sincerely,
S peddicord
Minneapolis, MN 55412-2547

From: pensmiles@everyactioncustom.com on behalf of [Penny Miller](#)
To: [Tony Johnson](#)
Subject: I am writing to you today regarding a very important issue
Date: Tuesday, March 18, 2025 1:59:02 PM

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

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

Dear St. Paul City Planner Tony Johnson,

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. I lived in the corridor for almost 20 years and I believe that the river canyon and the views it affords are the most striking feature of our city. People who visit me for the first time are always impressed by the beauty of the corridor and the uniqueness of having a haven for birds and wildlife as a centerpiece of an urban area. Please act to preserve this treasure.

Sincerely,
Penny Miller
Saint Paul, MN 55107-3035

From: debalper@everyactioncustom.com on behalf of [Deb Alper](#)
To: [Tony Johnson](#)
Subject: I am writing to you today regarding a very important issue
Date: Thursday, March 20, 2025 11:41:18 AM

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

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

Dear St. Paul City Planner Tony Johnson,

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 resident of St. Paul 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 I want to continue to enjoy the beauty and the bit of nature that the river brings to our city environment, and I want this beauty to be there when my grand children are adults. The Mississippi is a world class river whose migratory bird flyway draws visitors from around the world. Yet the birds themselves don't always survive their trip through our city, succumbing all too frequently to collisions with windows and tall buildings. Bird safe glass and appropriate lighting is the least we can do to help their survival. Please take action to ensure that strong measures are not omitted from the proposed ordinance.

Thank you
Deb Alper
1835 fairmount ave.
St. Paul

Sincerely,
Deb Alper
Saint Paul, MN 55105-1537

From: ksommerf14@everyactioncustom.com on behalf of [Kendra Sommerfeld](#)
To: [Tony Johnson](#)
Subject: I am writing to you today regarding a very important issue
Date: Thursday, March 20, 2025 6:46:22 PM

[You don't often get email from ksommerf14@everyactioncustom.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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

Dear St. Paul City Planner Tony Johnson,

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...

Sincerely,
Ms. Kendra Sommerfeld
South Saint Paul, MN 55075-1414

From: dmeister.mmc@everyactioncustom.com on behalf of [Debbie Meister](#)
To: [Tony Johnson](#)
Subject: I am writing to you today regarding a very important issue
Date: Friday, March 21, 2025 12:24:59 PM

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

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

Dear St. Paul City Planner Tony Johnson,

As the Saint Paul City Council moves to pass the Mississippi River Corridor Critical Area (MRCCA) ordinance, I urge you to support strong riverfront rules that are both good for the river and good for communities. Specifically, I urge that the St. Paul MRCCA ordinance includes bird-safe building requirements and clearer standards for building height and exceptions.

Bird-safe Buildings

As many as 50 million migratory birds pass through the Mississippi River flyway. I believe it is our responsibility to protect these migrating birds to the best of our ability. Requiring bird-friendly lighting design, building design and building materials (such as bird-safe glass) in all new developments along the river, will add very little to the cost while providing necessary bird protection.

Well-designed Building Height Standards

The river gorge through Saint Paul is a tremendous scenic resource. In many places, along the gorge it is possible to have views without seeing humanmade development. Well-managed building heights can protect these rare natural views for everyone to enjoy. Tiering building heights will also help protect the natural view line. The city should adopt the MN Department of Natural Resources (DNR) standards for tiering: the further a building is from the river, the taller it can be.

Clear Standards for Exceptions

Saint Paul's ordinance should adopt the DNR's recommended language about exceptions to these rules. Its written findings offer more specific criteria for evaluating a request based on its impact on river resources and scenic views.

I urge the city to adopt strong standards to protect the Mississippi River Corridor.

Sincerely,
Ms Debbie Meister
Saint Paul, MN 55104-6905

From: diskon@everyactioncustom.com on behalf of [Donald Kist](#)
To: [Tony Johnson](#)
Subject: I am writing to you today regarding a very important issue
Date: Friday, March 21, 2025 3:09:07 PM

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

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

Dear St. Paul City Planner Tony Johnson,

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 the Mississippi river running through downtown Saint Paul is a vital part of the Mississippi River Flyway. This is a main migration route of millions of birds through the mid section of our country.

They need safe navigation through this narrow downtown corridor without interference from tall buildings or glass structures without bird-safe windows. Having trees and greenery will help in giving them a place to rest and refuel. Besides fulfilling the needs of birds, this will add to the aesthetics of our city and make it a pleasant destination for a lunch, walk, bike ride, or just bird watching. Please reconsider adopting a policy more like the first draft from 2023, as it takes into consideration these very important factors, which contribute to a better quality of living in the great city of Saint Paul.

Sincerely,
Mr. Donald Kist
Saint Paul, MN 55105-1731

From: lbergerud@everyactioncustom.com on behalf of [Lisa Bergerud](#)
To: [Tony Johnson](#)
Subject: I am writing to you today regarding a very important issue
Date: Saturday, March 22, 2025 2:25:06 PM

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

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

Dear St. Paul City Planner Tony Johnson,

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 50 million birds migrate through the mississippi corridor and everyone in that area deserves to be able to see the river and not have their sight line blocked by overly tall buildings. noone but the rich are served in this plan.

Sincerely,
Ms. Lisa Bergerud
Saint Paul, MN 55108-1826

From: 66cintia@everyactioncustom.com on behalf of [Cynthia N Werner](#)
To: [Tony Johnson](#)
Subject: I am writing to you today regarding a very important issue
Date: Wednesday, March 26, 2025 3:44:42 AM

[You don't often get email from 66cintia@everyactioncustom.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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

Dear St. Paul City Planner Tony Johnson,

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...

This inept and oblivious administration has done nothing for 55101 except import more and more derelicts and addicts. You've ruined this neighborhood through your negligence and somehow you and Carter manage to run essentially unopposed. That seems rather 'mysterious'. My property value has dropped ... again. Why do people have to tell you repeatedly that they don't want ugly glass high rises along the riverfront? Monuments to your arrogance. Why build more crap in your ghost town? I thought we'd get a beautiful park similar to the Highline in NY. But no. Just more ignorance. And your bike path plan fits right in with the rest of your goofy decisions. Replace the trees you've already destroyed (like the beautiful flowering crab trees that were chopped down along Kellogg) and leave Summit Ave alone... unless the plan is really to devalue the entire city rather than just most of it. And then go away. You've done enough damage.

Sincerely,
Ms. Cynthia N Werner
Saint Paul, MN 55101-2707

From: sfwillis143@everyactioncustom.com on behalf of [Susan Willis](#)
To: [Tony Johnson](#)
Subject: I am writing to you today regarding a very important issue
Date: Monday, April 7, 2025 9:13:16 AM

[You don't often get email from sfwillis143@everyactioncustom.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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

Dear St. Paul City Planner Tony Johnson,

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 I am a naturalist and specifically an advocate for urban birds. I am speaking up for those that have no voice. I know the deadly consequences of glass buildings/windows for migrating birds, and if more people did, I'm sure they would want these amazing species better protected.

Here's your chance to do something remarkable and so, SO good for our city and our state and our world.

I appreciate your time and consideration,
Susan Willis
Merriam Park

Sincerely,
Mrs. Susan Willis
Saint Paul, MN 55104-5025

From: diskon@everyactioncustom.com on behalf of [Donald Kist](#)
To: [Tony Johnson](#)
Subject: I am writing to you today regarding a very important issue
Date: Saturday, April 19, 2025 5:32:54 PM

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

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

Dear St. Paul City Planner Tony Johnson,

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 the Mississippi River corridor is essential as the major migration route for millions of birds that use it as a navigation tool to get to their spring and fall destinations. With the added height and clear glass of the proposed buildings many birds will die. I happen to care.

You, and your fellow council members, no doubt want to increase river access and aesthetics for residents, workers and visitors. What helps this cause more, larger reflective structures or more thoughtfully planned environmentally friendly ones that make one want to stick around after work or a meeting.

Please don't cave-in to the pressure from developers and think of how pleasant it could be.

Sincerely
Donald Kist

Sincerely,
Mr. Donald Kist
Saint Paul, MN 55105-1731

From: gitag66@everyactioncustom.com on behalf of [gita ghei](#)
To: [Tony Johnson](#)
Subject: I am writing to you today regarding a very important issue
Date: Thursday, April 24, 2025 9:17:56 AM

[You don't often get email from gitag66@everyactioncustom.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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

Dear St. Paul City Planner Tony Johnson,

My question is - why on earth would you not protect birds on one of the world's most important migratory flyways?? It seems a no brainer.

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...

Sincerely,
Miss gita ghei
Saint Paul, MN 55103-1010

From: sonjasutter@everyactioncustom.com on behalf of [Sonja Sutter](#)
To: [Tony Johnson](#)
Subject: I am writing to you today regarding a very important issue
Date: Thursday, April 24, 2025 2:24:36 PM

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

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

Dear St. Paul City Planner Tony Johnson,

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 tiered building height.

This is important to me for supporting the health of the river, ecosystem, and housing in a sustainable way. As the state where the Mississippi begins, I believe we have an especially critical responsibility on this.

This Friends of the Mississippi River document contains more points on this:

<https://fmr.org/updates/land-use-planning/whats-our-deal-density>

Thank you so much for your time and consideration on this matter.

Sincerely,
Ms Sonja Sutter
Saint Paul, MN 55101-2561

From: dickensmarsha@everyactioncustom.com on behalf of [Marsha Macey](#)
To: [Tony Johnson](#)
Subject: I am writing to you today regarding a very important issue
Date: Tuesday, March 18, 2025 9:37:54 AM

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

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

Dear St. Paul City Planner Tony Johnson,

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 one of the delights of living in St. Paul is the easy access to the river from my home in Mac-Groveland. I walk along the river most days, and one of my joys is seeing the wildlife. It should be protected.

Sincerely,
Marsha Macey
Saint Paul, MN 55105-1323

From: [Colleen O'Connor Toberman](#)
To: [Tony Johnson](#)
Subject: MRCCA bird-safe standards: compatibility with state building codes
Date: Tuesday, March 18, 2025 2:58:46 PM

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

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

Hi Tony,

I was one of the guests at last week's Neighborhood and Comprehensive Planning Subcommittee meeting; thank you for giving the MRCCA presentation. By and large, I believe I understand the city's updated draft ordinance and I'm looking forward to the discussion at the public hearings.

I did want to pass along one suggestion--you mentioned that the city wants to examine the legality of bird-safe building materials requirements in relation to state building code. The state of Minnesota actually already does require bird-safe materials in projects funded by state bonds per its [B3 Sustainable Building Guidelines](#). So that could be a baseline for the city to consider that is already vetted for compatibility with state code.

Thank you!

Colleen O'Connor Toberman / Land Use & Planning Program Director
ctoberman@fmr.org / 651.477.0923 (call/text)
(she/her)

Friends of the Mississippi River

106 W. Water St., Ste. 600

St. Paul MN 55107-2032

FMR.org

See what we accomplished together in our annual report:

fmr.org/annual-report-2024

From: [Kurt Klussendorf](#)
To: [*CI-StPaul_MRCCA](#)
Subject: Proposed MRCCA ordinance testimony
Date: Saturday, May 3, 2025 3:52:45 PM

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

Greetings.

I am opposed to the current draft of the proposed MRCCA ordinance. There are a number of elements in the January 2023 draft that better protect the river and its viewshed for your citizens recreation and enjoyment.

- Building height limits were clearly addressed in the 2023 draft ordinances. The current draft eliminates this clarity with subjective standards that are open to interpretation and, therefore, regular legal and civic challenges from all sides.
- There should be clearer criteria for condition use permits and variances. Most cities have included the DNR's recommended language in their ordinances. Saint Paul should also use it.

Yours,
Barbara A. Klussendorf
699 Woodlawn Avenue
Saint Paul MN 55116

Tony Johnson

From: rashoncryer@everyactioncustom.com on behalf of Rashon Cryer
<rashoncryer@everyactioncustom.com>
Sent: Tuesday, March 18, 2025 10:04 AM
To: Tony Johnson
Subject: I am writing to you today regarding a very important issue

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

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

Dear St. Paul City Planner Tony Johnson,

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 protecting the environment is more important than ever for now and future generations. We are stewards of the river and must act to protect it.

Sincerely,
Rashon Cryer
Saint Paul, MN 55106-3115

City Councilmember

RE: MRCCA Zoning Protections

Recommendations:

Protection of the Mississippi River Corridor Critical Area is of utmost importance. It is vital for wildlife and natural habitat survival. As the only National Park centered on the Mississippi River, it serves MN residents and tourism. Natural resource protection and enhancement provides wonderful recreational and education opportunities for current and future generations.

Retain these existing protections :

1. "Only fill free of chemical pollutants and organic waste shall be used"
2. "Solid waste disposal and landfill shall not be permitted in the River Corridor District"
3. "Development shall fit existing topography and vegetation with a minimum of clearing and grading"
4. "No commercial or industrial development shall be permitted on slopes greater than twelve (12) percent" Retains existing prohibition on steep slopes.
5. No alteration of the natural environment or removal of vegetation shall be permitted when such alteration or removal would diminish the ability of dependent wildlife to survive in the River Corridor."
6. "The development of new and expansion of existing commercial and industrial uses shall only be on lands which are on the landward side of blufflines." (Retains Point Douglas as a residential street in Highwood) RN district
7. Retain prohibition of mining in the MRCCA.

These River Corridor Protections have been in place for half a century. Why undermine our efforts to protect and enhance this valuable resource?

Birders in our community have done a wonderful job explaining how we have the good fortune of living in a major flyway. A great case can be made for doing what we can to protect these beautiful creatures. Window strikes can be reduced. Is it too much to ask that our zoning code provide some level of protection to reduce these deaths?

Thank you for your consideration.

I am glad to sit down with you if you wish.

Tom Dimond