



Friends of the Mississippi River

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

June 8, 2009

President David Motzenbecker
Minneapolis Planning Commission
350 S. 5th St, Room 210
Minneapolis, MN 55415-1385

President Motzenbecker and Planning Commissioners,

Friends of the Mississippi River (FMR) is a local non-profit organization that works to protect and enhance the natural and cultural assets of the Mississippi River and its watershed in the Twin Cities. We have 1,400 active members and 3,200 volunteers who care deeply about the river's unique resources. We write today to ask you to deny the application for a variance and two conditional use permits for the property at 600 Main Street.

In addressing this application for zoning changes, we recognize the Commission has a responsibility to balance two key objectives. One objective is to provide for the reasonable use and development of private land. The other objective is to create a legal context that furthers the public priorities adopted in the City Comprehensive Plan. We also recognize that while density is frequently a social good in our urban core, unique site context will inform the range of appropriate density in any given location.

This parcel is identified as future park space in the pending revision of the Minneapolis Plan. City staff notes that this designation should, "act as a guideline and a tool to assist in making development decisions." The parcel was designated as future parkland for many good reasons. However, park designation aside, we believe there is a set of three other realities that on their own compellingly point toward denial of the zoning changes.

- 1. This is a unique location of major public significance located between the parkway, river and historic Stone Arch Bridge.** The Minneapolis parkway system is beloved because the land on the waterfront side of parkways has been uniformly preserved as a deeply public space. Only a handful of exceptions have been allowed to this principle, usually for water-dependent facilities like power plants.

The Minneapolis Critical Area Plan says that in the Central Riverfront, "the greenway system [should be] improved and extended" through land acquisition and easements. Priority is given to "extend existing Main Street to connect with East River Parkway at the University of Minnesota." As the included map demonstrates, the proposal under consideration would represent a striking exception to this surrounding pattern of public space. While the owner has a right to develop the parcel, care should be taken to ensure any building integrates well with its

surroundings, which includes riverfront parkland, and the connection to the historic Stone Arch Bridge. Permitting more intensive and more dominant private uses would diminish the public sense of place, stake, and potential in this key civic node.

The owner already has a right to develop this parcel. However, this prominent and public riverfront location argues against the Commission intensifying private use beyond what is already allowed by existing zoning.

2. **This is a riverfront location where development is to be limited in height.** As noted in the staff report, the *Mississippi River Critical Area Plan* provides key guidance on building massing for this site:

In general, structures within the Critical Area should be shorter when located closer to the river. Taller structures are possible within the Critical Area as distance from the river increases or measures are taken to provide some level of screening, buffering and/or enhancement of views of and from the river.

The nearest and closest analogue is Phase One of the Stone Arch Apartments, directly across Main Street. That building is somewhat shorter than what is proposed here: Stone Arch 1 is 5 stories or 54 feet, while the proposed changes – though closer to the river – would allow 6 stories or 70 feet. **The principle that building height should be limited nearer the river further argues against the intensification of private uses beyond what is already allowed.**

3. **This is a location at the edge of a Community Activity Center.** The limitations on site intensity are further underscored by the site's location just outside a Community Activity Center. The Planning Commission previously rejected zoning changes at this site. The current Minneapolis Plan notes the City “will support the development of residential dwellings of appropriate form and density,” and to achieve this, the City will, “promote the development of well designed moderate density residential dwellings adjacent to...Community Corridors and Activity Centers.”

Under the current Comprehensive Plan, moderate density is defined as 10 to 30 units per acre. The zoning changes would allow for 95 units per acre, over **triple** the density recommended under the Current Comprehensive Plan, and nearly double the density recommended by the pending Comprehensive Plan.

The Minneapolis Plan promotes medium densities on a site such as this, which further argues against opening up the site to high densities.

Individually, each of these three realities provides justification to deny these zoning changes. Collectively, they inform a robust and compelling direction to the Commission to deny these zoning changes. This compelling case for denial exists even without considering plans for park space on the site.

You may call Irene Jones or Bob Spaulding at 651-222-2193 with further questions.

Best regards,

Whitney L. Clark
Executive Director