



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

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Jack Byers, Long-Range Planning Manager  
Minneapolis CPED  
105 Fifth Ave South  
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Dear Mr. Byers and the 2040 Comp Plan Team,

Friends of the Mississippi River (FMR) is a local non-profit organization that works to protect, restore and enhance the Mississippi River and its watershed in the Twin Cities metropolitan region. We have more than 2,400 active members, 3,500 volunteers and 1,800 advocates who care deeply about the river's unique resources.

FMR takes an active interest in working with municipalities, counties, state government, and other stakeholders to help shape and influence decisions that impact the health of the river. Now in our 25<sup>th</sup> year, FMR plays a leadership role in ensuring that the public resources of our National Park —the Mississippi National River and Recreation Area (MNRRA), are preserved for current and future generations to benefit from.

FMR has been working with the city of Minneapolis, MPRB and other stakeholders for many years to restore and revitalize the Mississippi Riverfront in Minneapolis. We have appreciated opportunities to work in partnership with the city, and we look forward to continuing to have a productive relationship with city staff and leadership moving forward. As such, we respectfully submit the following comments regarding the Draft Mississippi River Corridor Critical Area Plan and 2040 Comprehensive Plan for the City of Minneapolis.

### **MRCCA Chapter 1 Introduction**

The public input process described on page 7 should be more specific and make note that the MRCCA plan had very limited review. It was released on May 24, 2018, two months after the public comment period opened and was not featured at any of the open house meetings.

The description of the “Lower Gorge” on page 11 is inadequate. The city and park board are entrusted to care for this uniquely significant resource; this plan should lay the foundation for that stewardship. We suggest rewriting the description to include the following information:

- Only gorge on the entire length of the Mississippi, formed by receding waters of St. Anthony Falls
- Historically this stretch had 8 miles of rapids; but it has been fundamentally altered and impounded by three locks and dams for more than a century
- Outstanding scenic qualities – unique geography in the heart of the city
- Significant bird and wildlife habitat; migratory corridor
- High quality native vegetation and restored areas
- Limited access to the river via staircases in the gorge and at the rowing clubs
- Actively used for youth paddling programs/opportunities and rowing (Urban Wilderness Canoe Area)
- Bluffs and slopes are highly sensitive to stormwater runoff, erosion and landslides which occur with increasing frequency

### **MRCCA Chapter 2 Districts**

Pages 12-18 provide an overview of the MRCCA districts within Minneapolis and include a reference table with height and setback requirements from the MRCCA rules. The table notes that in the RTC and UM districts: “Greater height may be allowed with a local conditional use permit.”

We would like this section to also include a reference to language in the rules about tiering away from the river. Minn Rules 6106.0120 subp 2A. attaches the following requirement to maximum building height allowed in the RTC, UM and UC districts:

“provided tiering of structures away from the Mississippi River and from blufflines is given priority”

This is especially important in the UC district, which relies on underlying zoning for height limits. Tiering of structures in the UC, UM and RTC districts will enhance these highly urbanized sections of the river by matching the built form to the shape and character of the river itself. Walls of buildings right along the river or parkway will cut off neighborhoods from the river and discourage equitable access to this important community amenity.

We recommend using policy language from the 2006 Minneapolis MRCCA plan, which we provide in our comments below on Chapter 10 Policies.

At the bottom of page 18, the plan states:

“The built form of all new and remodeled buildings must be consistent with the guidance of the Built Form Map. The built form districts... are consistent with the MRCCA Districts in the MRCCA.”

Although there is some consistency between the Future Built Form Guidance and the MRCCA districts within Minneapolis, there are also some inconsistencies, noted below, that need to be identified in this plan. Furthermore it should be stated that when there are two sets of standards, the more restrictive standard is applied.

Two MRCCA districts have a major inconsistency.

Most of the Upper River is within the Corridor 6 built form category; buildings up to 6 stories. In the MRCCA district scheme, much of this area is within UM – Urban Mixed, with a height limit of 65 feet. Nowadays most 6-story buildings are taller than 65 feet, and as much as 90 feet in some cases. We suggest using the Corridor 4 built form category north of the Plymouth Bridge.

In the Lower Gorge, the MRCCA district RN – River Neighborhood limits heights to 35 feet, but several locations in the Gorge are in the Interior 3 built form category, which allows up to 3 stories. We learned from the Minnehaha Academy proposal that a 3-story building can be more than 50 feet tall. Interior 1 or 2 is a more appropriate built form category for the Gorge south of Franklin. The only exception is right around Lake Street where MRCCA allows heights up to 48 feet, where Interior 3 would be acceptable.

This section should also point out that the built form of all new and remodeled buildings must be consistent with the policies in the MRCCA plan and Minnesota Rules Chapter 6106. The same is true for requests to exceed height limits through a variance or CUP—the findings must be consistent with the MRCCA plan.

### **MRCCA Chapter 3 Primary Conservation Areas**

This section provides good baseline information about the river’s important natural and cultural features, but it could be enhanced significantly with additional information. The MWMO has done fairly extensive review (and in many cases repair) of the conditions of the river shoreline, bank and bluffs, and MPRB is conducting natural resource planning for its entire system. Perhaps this section should reference other documents as well as identify additional river resource studies that should be completed in the near term and amended to this plan.

Page 52 of this chapter provides short descriptions of two important PCAs: Gorges and Unstable Soils & Bedrock. Considering there is only one gorge on the entire length of the Mississippi River, we’d like to see a more robust description of this special area. We provided some ideas in our comments on Chapter 1, but we would be happy to help expand the text of these sections further. This description makes the Gorge sound somewhat inhospitable, and neglects to mention several places where the river flats can be accessed by staircase or roadway.

Landslides due to unstable soils and bedrock present a serious concern for both the resource and public safety. While the county atlas will provide some helpful information, there are additional studies and assessments, such as the DNR’s 2016 report: “Historical Landslide Inventory for the Twin Cities Metropolitan Area,” C.E. Jennings et al, that could be referenced or used to enhance the information in this plan. Stormwater management at the top of bluffs is a critical factor in causing erosion and also needs to be addressed in this plan.

### **MRCCA Chapter 4 Public River Corridor Views**

In the introductory paragraph on page 53, the plan states:  
“Development is not prohibited if it can be seen from the river or is in a view corridor.”

We understand that many of the views along the river in Minneapolis are distinctly urban and that current and some future development will be visible from the river. Many views are in fact significant because of visible structures, such as the Stone Arch Bridge or the Minneapolis skyline.

The exception to this is the Gorge downstream of I-94, where views from the river toward the bluffs should continue to be free of visible development. Although the scenic qualities of the river gorge's forested bluffs are mentioned in the plan, not one Public River Corridor View was identified in this plan from the river's edge south of Annie Young Meadow.

We want to ensure the city recognizes the outstanding value of this unique and highly scenic stretch of the river—and that your plan does not make sweeping statements that undermine its protection under the MRCCA rules. Later in this section, we provide suggested policy language to ensure the Gorge retains its visual character.

On page 54 the MRCCA plan states:

“There may be other view corridors that individuals deem important or enjoy that may not be able to be included in this plan for various policy reasons.”

This is very disappointing as the city did almost nothing to gather public input about which views to include and why. Selection of views is one of the few plan sections for which the city has discretion, so ideas from community members should be welcomed.

FMR has been meeting with Minneapolis residents about the MRCCA plan and asking them to identify additional views they deem important. In particular, community members expressed concerns that almost no views were identified along the river in North Minneapolis, and very few views were identified in the Gorge, especially south of Franklin.

Based on the feedback we've gathered, we recommend that you add the following views to your inventory:

### **Upper River**

- Views from North Mississippi Regional Park – picnic pavilion and along trails,
- Views from Shingle Creek boat launch at 42<sup>nd</sup> Av N
- Views from Upper Harbor Terminal site, at Dowling, plus along proposed riverwalk
- Views from MPRB property, southwest corner of Lowry Bridge
- Views from 26th Avenue Overlook/Pier
- Views from Burlington Northern railroad bridge
- View of Grain Belt from 22<sup>nd</sup> Av N & MPRB headquarters (through Sheridan Park)
- View from Ole Olson Park south to the River Rats show area located south of the Broadway Bridge
- View from future overlook at 17<sup>th</sup> Av N
- Views of and from Hall's Island and Scherer site
- Views from Graco easement
- Gluek Park

## **Central Riverfront**

- Views from privately-owned public parks (e.g. Gold Medal Park)
- Views from Dinkytown Greenway; Bridge 9
- Views of and from Lower Father Hennepin Bluffs Park
- Views of and from the Stone Arch Bridge at the lock end and the park areas below the bridge on each side
- Views from CenterPoint Energy site; close to the river on the downtown side.
- Views of and from the Third Avenue Bridge
- Views of and from Boom Island/Nicollet Island railroad bridge
- Views of and from the East Channel
- Views of and from old Roundhouse area on Boom Island (between main channel and the little bridge)
- Views of and from the north tip Nicollet Island
- Views from the Guthrie's endless bridge

## **Mississippi Gorge**

- Views of Riverside Park – top of bluff and Annie Young Meadow
- View of the bluffs from the sand flats on east side of river (near St. Paul border)
- View of the bluffs from the white sand beach on west side of river at the bottom of the 27<sup>th</sup> Street staircase
- View of the bluffs from the Minneapolis Rowing Club on west side of river below the Lake Street Bridge
- Views of the bluffs from the sand flats on west side of river at the bottom of the 34<sup>th</sup> Street staircase
- Views from Winchell Trail between 44<sup>th</sup> and 36<sup>th</sup> Streets
- Views from Wabun picnic area – east side along bluff

### Viewshed Protection in the Gorge

Although we identified several specific viewpoints in the Gorge, we would prefer a blanket approach be used for views from the river towards the bluffs.

The river corridor in Minneapolis is highly scenic, with many points of interest and diverse landscapes to experience by foot, bike and car. And while many of these views are distinctly urban, the views in the Gorge offer an escape from the urban environment. If you are standing at the river's edge, it can feel reminiscent of wilderness far outside the city. Looking up from the river, all you see are bluffs, trees and bridges. Buildings are almost non-existent from this vantage point—and it should stay that way.

Public River Corridor Views are defined in the MRCCA rules as “views toward the river from public parkland, historic properties, and public overlooks, as well as views toward bluffs from the ordinary high water level of the opposite shore, as seen during the summer months.”

There is no question that from the river, the entire gorge is scenic, no matter where you are standing or floating. It is the responsibility of the cities of Minneapolis and St. Paul to properly identify and protect this highly significant viewshed in its entirety.

Corridor development along the gorge should not be too tall. Views from the river to the top of the bluffs should be protected so when you look up from a boat you don't see buildings sticking up above the trees. Please preserve the unique scenic qualities of the gorge for all to enjoy.

Downstream from I-94, the entire stretch of the gorge should be identified as a "Public River Corridor View." We recommend the following language be included in your inventory of Public River Corridor Views:

*From the I-94 bridge to the southern city limits, the **Bluffs of the Mississippi River Gorge** should be protected from development that is visible from the shoreline. From this vantage point, structures atop the bluff should not be readily visible above the tree tops as seen during the summer months. The exception to this is views of the University of Minnesota and downtown skyline, which come into view upstream of Lake Street.*

#### **MRCCA Chapter 5 Restoration Priorities**

There are a few places where the maps of significant vegetation and restoration opportunities could be expanded, based upon approved plans and recent restoration work that FMR is involved with.

##### Ole Olson Park

Land between the river and trail has been restored to native prairie that is not identified.

##### Nicollet Island

Woodland restoration work is underway that includes the undeveloped two acres at the north end of the island (adjacent to homes on Island Ave)

Prairie restoration is underway at land across from the DeLaSalle football field (bounded by the railroad tracks, the east channel, 1<sup>st</sup> Ave N and East Island Ave)

Something that is not captured well in this plan is the opportunity to replace invasive species with native vegetation. Restoration opportunities tend to focus on returning natural vegetation to areas without it, which is extremely important for the health of the river corridor, but it leaves out the many opportunities to conduct restoration in the areas that are mapped as "existing significant vegetation."

Since mapping this would be complicated and confusing, we have suggested adding some policy language to ensure that restoring native species is a priority as well as restoring vegetation to eroded/exposed areas. MPRB is in the process of developing a natural resource inventory and management plan for all the system's natural areas and restoration priorities, and this document could provide additional information or be incorporated by reference.

The plan includes one example of a section of riverbank in need of restoration along the east bank across from Nicollet Island. We found it odd that this was the only section included, when there are numerous opportunities that were not included.

The Mississippi Watershed Management Organization (MWMO) has done extensive study of the condition of the riverbank and could provide additional examples. We recommend that you consult with them and expand the specific opportunities listed within the MRCCA plan.

### **MRCCA Chapter 6 Open Space and Recreational Facilities**

Minneapolis has a long tradition of wonderful open space and passive recreation opportunities along its waterways, and the vision of continuous parks and trails on both sides of the Mississippi River throughout Minneapolis is gradually becoming a reality!

For more than two decades, FMR has worked closely with the city, MPRB and the broader community of stakeholders to help shape and support riverfront park planning, development and stewardship, and we are grateful for the progress that has and will be made. That said, we have several comments about how to improve this section.

The narrative on pages 74-75 could be expanded significantly. As written, this section is focused on describing recent and current master plan update processes, and it provides limited information about the parks themselves.

It's not clear how much input MPRB planners have had in the development of this chapter, but it would be beneficial to get a more detailed summary of each regional park from them. Some things that should be included in these summaries are:

- Number of existing and planned acres
- Identification of planned infrastructure repairs/capital improvement
- Plans for new or expanded park development such as trails, picnic shelters, parking lots, etc.
- Details about projects that will require special permits, such as island building, trail bridges, etc.
- Description of significant natural areas, native plant communities; recently planned, ongoing or completed restoration
- Overview of historical significance of parks and park amenities
- Information about threatened or endangered species, if available

North Mississippi Regional Park should be added to the narrative and made more explicit in the Upper River maps.

The Central Mississippi Riverfront Regional Park Master Plan was approved by the Met Council on August 30, 2016.

We recommend adding the fact that a significant portion of the Mississippi Gorge Regional Park is in St. Paul, and Minneapolis and St. Paul will coordinate efforts to manage park resources in the Gorge.

### Maps on pages 76-80

The Upper River map on page 76 is missing existing parkland on both sides of the river between Plymouth and the BN Bridge.

The proposed park boundary/study area maps on pages 79-80 are difficult to read due to similar colors. It's hard to see exactly where the shoreline is and where park does not yet exist within the boundary. Please delineate this information with more contrasting colors.

There appears to be some discrepancies between these maps and the areas guided for parks on the 2040 built form and land use maps. All of the land within the Above the Falls regional park boundary is guided for park on both the 2040 maps, including land that is yet to be acquired on both sides of the river. And by the way, we think this is awesome!

This not true for the Central Riverfront regional park boundary – several key riverfront locations within the existing or proposed new boundary were not guided for park, including a portion of the Star Tribune property at Plymouth, the CenterPoint site on West River Parkway Av S, property owned by the U of M, and others between the Stone Arch Bridge and Dinkytown.

Minneapolis has a great tradition of parks and parkways along our waterways with private development across the road from the park. This development pattern ensures more equitable access to the river, which belongs to everyone.

All of the land within the existing and proposed new Central Riverfront Regional Park boundary should be guided for park in the 2040 Land Use and Built Form Maps. Buildings should not be located between the parkway and the river, as that will privatize the riverfront for generations.

Specifically, riverfront land from 6<sup>th</sup> Av SE to 14<sup>th</sup> Av SE is needed to complete the missing park and trail link from the Stone Arch Bridge to the U of M campus. It should not be guided for 4-6 story buildings.

Public parkland along the river and bluff from 11<sup>th</sup> Av S to 35W would provide a seamless connection between the Central Riverfront and Mississippi Gorge regional parks. It should not be guided for 20-story buildings – they would wall off the river! We strenuously object to private development riverward of the parkway.

### **MRCCA Chapter 7 Transportation and Public Utilities**

We appreciate that the plan that discourages new river crossings and the preservation of historic crossings.

### **MRCCA Chapter 8 Surface Water and Water Oriented Uses**

A map should be added to this section that identifies existing and planned water trails, boat launches (motorized and non-motorized boats) and other boat facilities.



## **MRCCA Chapters 9, 10, 11 Opportunities, Policies and Implementation**

We suggest the following additional policies be included:

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. *(2006 Minneapolis MRCCA Plan, Section III. B-6. Building Height)*

Work with MPRB and other natural resource organizations to encourage and support restoration of native plant communities, use of native plants for landscaping and preservation of large beneficial tree species within the corridor.

Work with MPRB and property owners/developers to encourage and support the timely acquisition of riverfront land within the Above the Falls and Central Riverfront Regional Park boundaries.

Minneapolis should set a goal to update their MRCCA ordinance in 2019. The existing ordinance is extremely weak, inadequate, and out of compliance with both past and present versions of state MRCCA law. It will take the city some time to update the zoning code per the 2040 Comprehensive Plan. The MRCCA ordinance update should proceed before the full zoning code overhaul takes place – protecting the river need not and should not be delayed.

## **Minneapolis's 2040 Comprehensive Plan Land Use Maps and Built Form Maps**

In addition to the comments provided above on the draft Minneapolis MRCCA Plan, we have the following additional comments on the 2040 Comprehensive Plan Land Use Maps and Built Form maps.

- FMR appreciates that parkland was included along the Mississippi riverfront throughout the Above the Falls area (Plymouth Avenue N to Minneapolis's northern border).
- It does not appear that the property recommended to be added within the regional park boundary in the 2016 Central Riverfront Regional Park Master Plan is included as "Parks & Open Space" in the 2040 Comprehensive Plan Built Form Maps or the Land Use Maps. Please make sure that the 2040 Comprehensive Plan maps are consistent with the future regional park boundary shown in Figure 45 of the 2016 Central Riverfront Regional Park Master Plan.
- FMR appreciates the addition of the Min-Hi Line on the "Parks" built form map. We'd encourage a similar designation for the Great Northern Greenway connecting Theodore Wirth Park to the Diagonal Trail across North and Northeast Minneapolis and the Mississippi River.

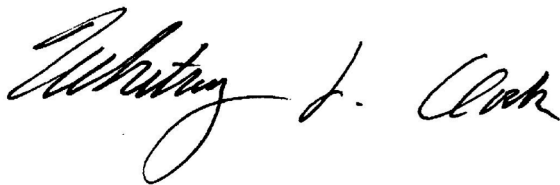
- We are concerned that the strips of “Production & Processing” land use and the “Production” built form shown along I-94 in North Minneapolis will not allow for the new connections between the river and the heart of the Northside neighborhoods. Both the Above the Falls Regional Master Plan and the RiverFirst Plan call for a new bridge (i.e. land bridge or pedestrian bridge) over I-94 in North Minneapolis.

Currently, the industry between I-94 and the Mississippi River functions as a barrier for people to access the Mississippi River. In many cases this is because the industrial uses physically block residents from accessing the river with their property lines and fences. However, several industries on the river create so much pollution that it becomes a barrier for pedestrians even when pedestrian amenities are available. One example of this is the Lowry Avenue N connection to the river. This route has pedestrian amenities but is still not walkable because of the smell and air pollution coming from the GAF stacks (50 Lowry Ave N). Residents’ difficulty breathing in the area largely undermines the existing pedestrian amenities.

So, will maintaining “Production & Processing” land use and the “Production” built form shown in North Minneapolis adjacent to I-94 allow for the new bridge over I-94 to be built? Are these appropriate classifications for a new bridge to end at or pass above? How will they impact the bridge-user experience? If these land uses are maintained, what is the city planning to do above and beyond what it is currently doing to ensure this area becomes a hospitable place for people traveling between their homes and the Mississippi River?

Thank you for the opportunity to provide these comments. FMR has a strong interest in helping the city to realize their goals for the river corridor and we look forward to working with you as you implement your plan. Please do not hesitate to contact us if you have questions about these comments.

Sincerely,



Whitney L. Clark  
Executive Director

Cc: Adam Arvidson, Director of Strategic Planning, MPRB  
Dan Petrik, Land Use Specialist, Minnesota DNR  
John Anfinson, Superintendent, Mississippi National River and Recreation Area