



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

101 East Fifth Street  
Suite 2000  
Saint Paul, MN 55101

651-222-2193  
[www.fmr.org](http://www.fmr.org)  
[info@fmr.org](mailto:info@fmr.org)

January 9, 2017

Merritt Clapp-Smith  
15 Kellogg Blvd. West  
Saint Paul, MN 55102  
[Merritt.Clapp-Smith@ci.stpaul.mn.us](mailto:Merritt.Clapp-Smith@ci.stpaul.mn.us)

RE: FMR comments on Ford Redevelopment Zoning and Public Realm Plan

Ford Task Force Members:

Friends of the Mississippi River (FMR) is a local non-profit community-based organization that works to protect and enhance the natural and cultural assets of the Mississippi River and its watershed in the Twin Cities. We have 2,000 active members, and more than 3,500 volunteers who care deeply about the river's unique resources. FMR has been an active and ongoing participant in planning for the future of the St. Paul riverfront.

We are writing today to share our comments on several components of the Ford Site Redevelopment Zoning and Public Realm Plan.

### **Building Heights**

We appreciate the care that has been taken to minimize the impact of future new structures on the site both within and outside of the Mississippi River Corridor Critical Area. We strongly believe that structures on the Ford Site should not be visible above the treeline as viewed from the opposite bank of the river and it appears that the proposed zoning for the site is close to meeting that performance standard. We look forward to working with staff to more closely evaluate the scenic impacts of structures through 3D modeling.

There are also many blufftop public overlooks, parks and cultural sites in the vicinity (e.g. Fort Snelling, Ford Bridge, Wabun Picnic Area, etc.) that currently feature outstanding scenic views of the river bluffs. New development on the site will certainly alter the character of those views and we therefore believe that it will be important for the City to adopt design standards that minimize visual intrusiveness.

### **Open Space**

FMR served on the 2010 Ford Open Space Work Group and we are pleased to see some of the guiding principles from that work incorporated into the Zoning and Public Realm Plan and Transportation Plan. We are especially pleased with the proposed linear stormwater feature/pond and associated open space, which we believe will fulfill the principles of having open space serve multiple functions and providing an interconnected greenway as a central

feature of the site. The orientation of the water feature leading toward Hidden Falls will draw people toward the park and the proposed Mississippi River Boulevard bridge over the “creek” will enhance the integration of this feature with the natural falls. The integration of park-like stormwater features, bike/ped only streets, a greenway and traditional parkland will make the site more livable and attractive to both new residents and nearby neighbors.

One of the guiding principles agreed to by the Open Space Working Group was that *“if higher acreages of open space can be attained, natural areas along the bluff should be expanded”*. FMR believes this is a missed opportunity of the Zoning and Public Realm Plan. The existing strip of parkland on top of the bluff and riverward of Mississippi River Boulevard is very narrow leaving little room for park activities, overlooks, picnic facilities, etc. that new residents of the Ford site might desire to have at the bluff top rather than having to go down to Hidden Falls Park. We urge the City to consider realigning Mississippi River Boulevard to the east to create a more expansive blufftop park. Unlike the ballfields or neighborhood parks that are part of this Plan, this expanded public parkland could be included within the redrawn boundary of the adjacent Hidden Falls Regional Park, which would make it eligible for Regional Park acquisition funds through the Metropolitan Council, thereby not requiring as much contribution from developers or St. Paul taxpayers.

Additionally, whether or not additional bluff top parkland can be created, the City should take this opportunity to eliminate or relocate the existing parking lot that lies riverward of Mississippi River Boulevard. This is tremendously valuable parkland overlooking the scenic gorge. We believe it should not continue to be used for automobile parking. Relocating the parking lot would also have the benefit of eliminating the two driveway crossings of the bike trail — reducing potential conflicts between cyclists and cars. There is only one Mississippi River and opportunities to add parkland along its bluffs do not present themselves every day. The City should not miss this chance to create a gracious and public-spirited amenity that will serve many generations of St. Paul and regional residents.

### **Riverview Corridor Crossing**

FMR is closely following the planning for the Riverview Corridor Transit route that could, of course, impact the Ford Site. We concur with the view of the National Park Service that the line should cross the Mississippi River at one of the two existing crossings, either the Ford Bridge or the Highway 5 Bridge. In either case, we believe that it is of utmost importance that the design of the crossing minimize, to the greatest extent possible, impacts to the river bluffs, mature trees and adjacent parkland. We believe that this would require a mode that can utilize the existing bridge infrastructure without requiring an additional bridge structure.

### **East River Road Trail Improvements**

As the Ford Site is constructed and area bicycle and pedestrian infrastructure is expanded, the Mississippi River Boulevard trail bottleneck under the Ford Parkway Bridge must be addressed. We encourage the City to explore measures to separate the bicycle and pedestrian trails under the bridge. It may be possible to mount a trail structure on the river side of the bridge pier, overhanging the bluff to facilitate a resolution to this pinch point.

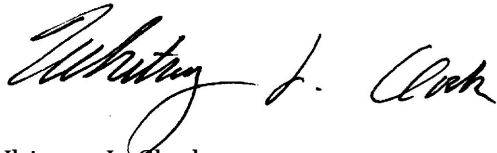
### **Riverfront Parcel - Area C**

FMR continues to be deeply interested in the findings of Area C environmental testing. Many people who are following the Ford redevelopment process are still unaware that the riverfront

parcel known as "Area C" contains a toxic waste dump that has not been remediated. We understand that the results of the testing will be made available to the public in the near future and look forward to analyzing them. We hope the City will share the results with the Task Force and devote time in the public meeting process to interpreting and discussing the potential risks and liabilities associated with this legacy of pollution. We want to ensure that the many new residents predicted to live in this area are not left living next to a toxic dump. We are also very concerned about the impacts of potential toxins on river water quality, especially during flooding.

Thank you for considering our comments. We look forward to continuing to work closely with the City and the public to ensure that the Ford redevelopment enhances and is enhanced by the great Mississippi River.

Sincerely,

A handwritten signature in black ink, appearing to read "Whitney L. Clark". The signature is written in a cursive, flowing style.

Whitney L. Clark  
Executive Director

cc: Ford Task Force members  
Mayor Chris Coleman  
Councilmember Chris Tolbert  
Superintendent John Anfinson, NPS, MNRRA