



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

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June 30, 2017

Saint Paul Planning Commission
Betsy Reveal, Chair
15 Kellogg Blvd. West
Saint Paul, MN 55102

RE: Ford Site Zoning and Public Realm Plan

Chair Reveal:

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 2,300 active members, and more than 6,500 annual 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 river in Saint Paul and more specifically, for the last 10 years, the Ford site.

Overall FMR is very supportive of the vision for the site and many aspects of the plan. We strongly support the higher density, transit-friendly, mixed-use vision for the site and greatly appreciate the emphasis and care that has been given to sustainability, especially with respect to powering the new development with renewable energy. We have also been impressed by and are grateful for the cooperation and patience demonstrated by planning staff as we have worked with them over the past 10 years to understand the complex issues related to this site. They have consistently been willing to listen to our arguments and to entertain our requests for more information. They represent the City with distinction.

Parks and Open Space

FMR staff 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. 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 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*

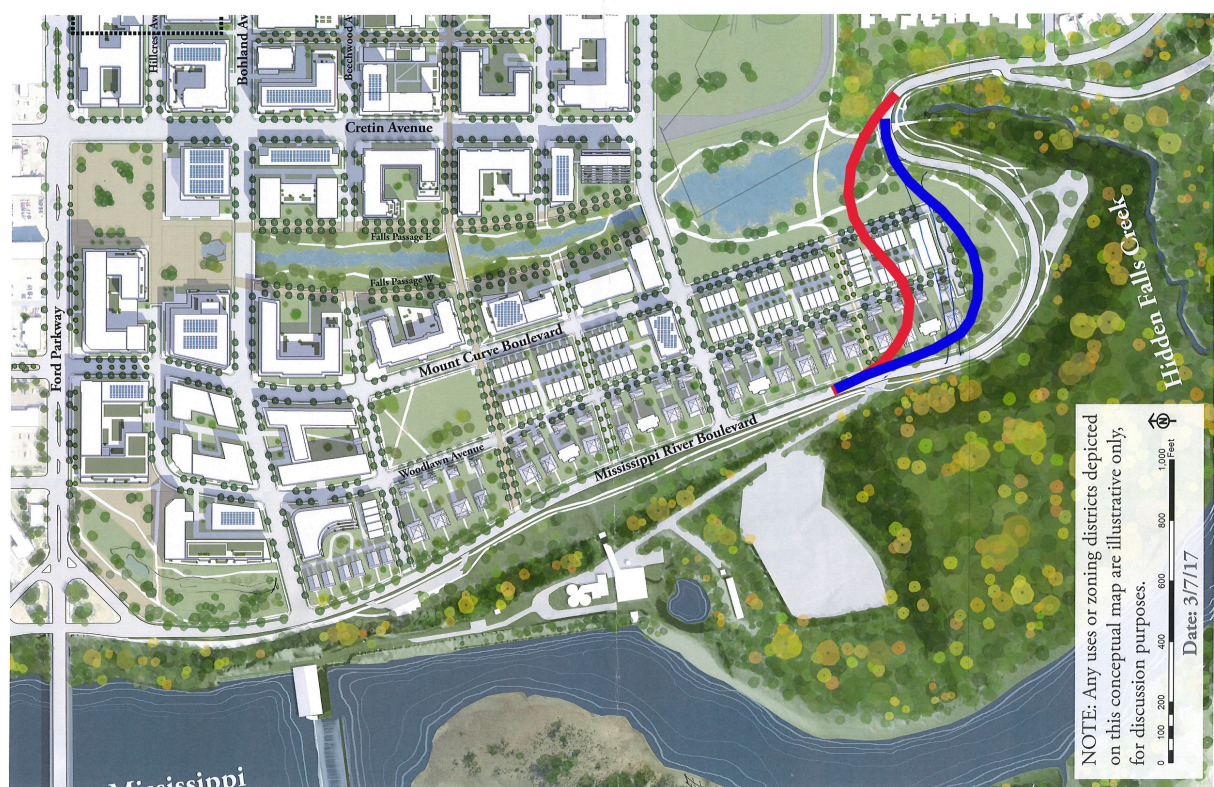
expanded." (Ford Site Open Space Guidelines) FMR believes this is a missed opportunity of the Zoning and Public Realm Plan. The existing strip of parkland on top of the bluff and riverward of Mississippi River Boulevard is very narrow, leaving little room for park activities, overlooks, picnic facilities, etc. that new residents of the Ford site as well as regional visitors might desire. We join the Ford Site Task Force in recommending that the City realign Mississippi River Boulevard to the east at the south end of the site to create a more contiguous and expansive bluff top park.

Unlike the 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. An additional benefit of this proposal is that it would allow more of the City's park dedication acres to be used to increase neighborhood parks throughout the site, while increasing the overall public park acreage at the site.

Figure one (below) illustrates two possible realignments of Mississippi River Boulevard (MRB). In the blue realignment scenario, approximately 2.3 additional acres of parkland would be created at the bluff top and consolidated riverward of MRB. This would mean that approximately 1.4 acres of parkland could be added elsewhere in the site.

In the red realignment scenario, approximately 6.5 additional acres of parkland would be created at the bluff top and consolidated riverward of MRB. This would allow approximately 2.9 acres of parkland to be added elsewhere in the site.

Figure 1



Additionally, whether or not additional bluff top parkland can be created, the City should take this opportunity to reduce 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 public-spirited amenity that will serve many generations of St. Paul residents and visitors.

Building Heights

We appreciate the overall approach to building heights described on page 33, that will facilitate the protection of public river corridor views by prescribing that buildings are “tiered across the site starting with lower buildings on the west and moving steadily upward in height to the east.” This is consistent with Mississippi River Corridor Critical Area (MRCCA) rules, which require: “tiering of structures away from the Mississippi River and from blufflines...” in the River Towns and Crossings District and the Urban Mixed District. (Minn Rules §6106.0120).

We are concerned however, that structure height limits are inconsistent with MRCCA standards in the Gateway and Residential Mixed Low zoning districts. As we have said in previous discussions with city staff, FMR will not oppose buildings that exceed the numeric standard, provided the performance standard from the MRCCA rules §6106.0120 is met—namely that taller heights are permitted, provided the structure’s height is generally consistent with the mature treeline, where present and existing surrounding development, as viewed from the ordinary high water level of the opposite shoreline.

Many factors that cannot be known at this time will affect whether buildings on the site can meet the MRCCA performance standard including possible changes in grade, mechanical structures atop buildings, rooflines for which building height is calculated as an average between roof peak and eaves, and taller buildings that could be permitted through the CUP process. For this reason we urge the City to zone the site more restrictively in the two aforementioned districts, with the understanding that additional height may be allowed through the CUP process if the MRCCA performance standard can be met.

Gateway District (F6)

In the Gateway district, which lies within the River Towns and Crossings (RTC) district of MRCCA, the proposed structure height limit of 65 feet exceeds the allowed height of 48 feet by 17 feet.

According to the visual impact diagram on page 32, if buildings in the Gateway district (NW corner) are 65 feet or taller, they will be visible from the opposite shore of the river during leaf-on conditions. This impact to the scenic river gorge should be avoided. We would like to see a change made to this part of the zoning plan. One solution is to lower the maximum

height for the gateway district to 48 feet. This would be much more in keeping with graphic depictions (page 110) of the site that show parkland and/or open space between Woodlawn and Mississippi River Boulevard along Ford Parkway. A height limit of 48 feet is also consistent with the proposed uses for this district, which include office, institutional, retail/service and employment.

Another solution would be to change the district from F6 to F1. In this scenario, the Gateway district could move back to the east side of Mount Curve Avenue, where it would provide a gateway to the site that can actually be entered. Right now the grade change for the bridge connections to Mississippi River Boulevard would make it awkward to enter the site at the northwest corner.

An additional concern that we have about establishing the Gateway District that so far exceeds the MRCCA height standard is the precedent that it may set for future uses of the district at bridge crossings such as Hwy. 5 where buildings taller than 48 feet would be inappropriate.

Finally, we urge the City to include a stronger emphasis on parks and plazas in the description on page 39. A significant amount of the land proposed to be park is within the F6 Gateway District and the public features that will define the way this district gets developed should be primary among the allowed uses. In keeping with this idea, requiring a minimum height of 30 feet seems counterintuitive. Most park buildings do not exceed two stories, and 20 feet would be a more appropriate minimum height for the Gateway district.

Residential Mixed Low District (F2)

In the Residential Mixed Low district, which lies within the River Neighborhood (RTC) district of MRCCA, the proposed structure height limit of 55 feet exceeds the allowed height of 48 feet by 7 feet. We request that the F2 district in the block between Mississippi River Boulevard and Woodlawn Ave be changed to F1 (River residential), which carries a 48-foot maximum building height limit.

CUPs and Variances

Lastly, the plan should include more detail regarding conditional use permits and variances for height. Since tiering of building heights is so important to the overall plan to protect viewsheds and to access solar power through roof panels, some detailed guidance for developers, planners and policy makers about how proposed exceptions will be reviewed and evaluated is warranted and could prevent disagreement in the future.

National River

We appreciate that information is included on page 25 that describes how the Ford plan fits within the context of the state designated MRCCA. We would also like to see the plan reference the Mississippi National River and Recreation Area. More than half of the Ford site is within a National Park, a fact that is not mentioned anywhere in the plan document.

We appreciate the opportunity to comment on the Zoning and Public Realm Plan and look forward to working with the City throughout the plan adoption process and the development of the site.

Sincerely,

A handwritten signature in black ink, reading "Whitney L. Clark". The signature is written in a cursive style with a large, stylized 'W' and a long, sweeping underline.

Whitney L. Clark
Executive Director