April 1, 2019

Kate Lamers
Minneapolis Park & Recreation Board
2117 West River Road N
Minneapolis, MN 55411

Re: Comments on the Above the Falls Regional Park Master Plan

Dear Ms. Lamers,

Thank you for the opportunity to comment on the draft Above the Falls Regional Park Regional Park Master Plan.

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 2,700 active members, 3,500 volunteers and 2,000 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. FMR was founded and continues to play 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 is also an active and ongoing partner with MPRB in planning and advocating for the Above the Falls, where we have played a leadership role with the Above the Falls Community Advisory Committee for the past two decades. We greatly value the constructive relationship we have with MPRB staff and we are committed to assisting with plan implementation.

In general, with the exception of the Upper Harbor Terminal site, we support the draft plan, and we appreciate the work that has gone into it. We are pleased that the RiverFirst plan adopted in 2012 is characterized as a visionary call to action instead of a prescriptive planning document.
As you know FMR has opposed the City of Minneapolis’ concept plan for the UHT, in part because of the size and configuration of parkland in the plan. We recognize that MPRB may not have control of these issues, but we are disappointed the parkland acreage is not greater and that private development is planned between the parkway and the river.

Our specific comments, detailed below, provide a summary of the concerns, recommendations and suggested changes that we’d like to see addressed in the plan, as well as some of the plan elements we consider to be positive.

**Executive Summary**

**ATF Plan Principles,** p E-3
The fourth bullet in this section could be strengthened: “Integrate stewardship of natural and cultural resources with the design, management and programming of new and existing parks and trails”

**Near Term Priorities,** p E-3
We suggest adding a near-term priority about continuing to pursue land acquisitions and easements and develop a continuous trail system.

**Ch 1 Previous Planning**

**Park Boundary Evolution,** p 1.5 to 1.7
According to Figures 1.3 and 1.4, the parkland along St. Anthony Parkway will be removed from the ATF park boundary. Will this area still be eligible for regional park funding? If so, it would be helpful to explain that in this section.

**ATF Master Plan 2000,** p 1.5
We appreciate the inclusion of these objectives and we suggest reiterating that they still apply.

**Implementation,** p 1.8
The list of accomplishments doesn’t sync with Figure 1.5 on p 1.9. Perhaps this section should reference that it is a partial list of the projects included in Figure 1.5

**Riverfirst,** p 1.10
This section does an excellent job of clarifying how Riverfirst fits in to the Above the Falls Plan. Riverfirst is a very visionary plan, but many of the specific concepts are not realistic or feasible. We strongly support the approach you articulated in this section. Figures 1.6 and 1.7 are helpful, but somewhere they should indicate that only the ATF portion is included in the maps. Otherwise it gives the false impression that Riverfirst has focused on ATF exclusively and not the Central Riverfront.

**Ch 2 Park Background**

**Existing Parks – West Bank,** p 2.6
Ole Olson Park history has no mention of the supper club that existed there. I know there is some community angst about events that took place there, but it seems odd to just erase it from the history.

**Fig. 2.3 Land Use, p 2-8**
This map is from 2010. Is there a more recent version of existing land use in the recently adopted Mpls 2040 Plan that could be used instead?

**Fig. 2.4 Public Land Ownership, p 2-10**
Has this map been updated since 2012? There are some properties that are not identified as publicly owned, such as the Ramsey Excavating site at 41st Av N and the Gedney Pickle Factory site at 31st Av N.

**Fig. 2.5 Existing & Planned Bikeways, p 2-11**
This map should include a date

**Ch 3 Community Engagement**

**Equity Analysis, Green Zones, Promise Zones, etc, p 3-5 to 3-11**
We appreciate the addition of this section. It’s well done and very thorough. MPRB will need to work closely with the City and other partners to develop and implement additional strategies to ensure park development does not lead to gentrification/displacement.

**Ch 4 Visitor Demand**

No comments

**Ch 5 Natural Resources and Management**

We have more recent (and more pretty) photos of the restored prairie at Ole Olson Park that would spruce up this section.

**Historic Resource Inventory, p 5-11**
This section should add mention of studies done by the City to determine historic designation potential for the UHT relics.

**Soil Contamination, Figures 5.5 and 5.6**
PCA maps on pp 5-12 & 5-13 should include dates

**Ch 6 Park Development Concept**

**Basis in 2000 ATF Master Plan, p 6-2**
The table showing major changes from 2000 to 2019 is very helpful. In general some of the grander ideas from the 2000 plan have been replaced with more natural features such as
restored riverbank, trails and overlooks. Riverfirst brought in new destination concepts, but some of them are unrealistic and won’t happen either.

We have generally been supportive of these changes, but it does raise an interesting conundrum: Is Above the Falls becoming too much of a passive park? Future plans for the Graco Park, 26th Ave N and the UHT promise to create destination parks, if they are implemented successfully. We are hopeful that these projects can move forward, as they will ensure that the park can serve both the local and regional community.

The map/table in this section should also include changes to the UHT site (no more Grand Staircase) and St. Anthony Parkway

Park Development Concept, 6-4 to 6-5
We are supportive of the park development concept, but we have a few suggested changes.

This summary needs to be updated a bit. It refers to the veteran’s memorial at Sheridan in the future tense and describes the “Scherer site” as if nothing has been completed yet (island, trails, funding).

The Northside Wetlands Park is mentioned in this section, but is that really the plan for the southern portion of the UHT? This is a bit confusing and conflicts with the UHT planning information in the appendices.

We are very pleased to see the “Promenade” replaced with restored riverbank and the 26th Av N overlook.

Park Projects

Graco Park, p 6-6
The description could provide more information or indicate that the site plan shown in Figure 6.4 is likely to change to reflect Graco’s presence on site.

The last sentence in this section is a little confusing. We suggest the following rewrite: “In 2019, the MPRB made an agreement with Graco to exchange development rights on the non-regional park portion of the Scherer property for a riverfront trail easement on their property, park naming rights and a substantial donation toward park development.

Sheridan Memorial Park, p 6-7

Please add the rain garden to the list of amenities at the end of the first paragraph.

The park development concept graphic is tiny and provides very little detail. Also it is referred to as figure 6.7 in the text – it should be 6.5

East Bank Trail, p 6-8
The 2000 plan was more definitive about providing separate trails for bikes and pedestrians. As it is MPRB policy to have separated trails, there should be a stated goal about this in the document.

**Upper Harbor Terminal Redevelopment, p 6-8**
This section is very short, and it seems like a little more info within the body of the plan would be helpful. Also, it’s odd that there is a graphic of the wetlands complex, but no mention of it in the narrative. (Also see our comments on Appendix A)

**Trails and River Crossings, p 6-10**
First paragraph describing existing trails does not include east bank trail from Plymouth to BN Bridge.

There’s also a typo – “St.” is missing from St. Anthony Parkway regional trail.

Change Scherer Bros site to Graco Park

**National Water Trail, p 6-11**
The last paragraph is out of date. It references things that will be done before the lock is closed.

**Public Water Access Points, p 6-13**
Change Scherer Bros site to Graco Park

**Parkway Development & Phasing Strategy, p 6-13**
We strongly support this language from the draft plan:

> “Unlike the 2000 ATF Plan, this plan locates the proposed West River Parkway directly adjacent to proposed riverbank parkland, separating the riverbank from future private development.”

However, Figure 6.1 on the next page provides an example at the UHT, where planned structures are surrounded by parkland and the parkway is separated from the river by private development. This is exactly what you are trying to avoid.

The city should support the MPRB policy of using the parkways to delineate the public domain from private development – it’s a hallmark of our award-winning park system and what sets Minneapolis apart from other cities.

**Ch 7 Land Acquisition, Easements, and Conflicts**

**Boundaries and Acquisition Costs, p 7-2**
“Recent successes...” in the fifth paragraph should be updated to include recent acquisitions on west side of the river, such as the Ramsey Excavating site at 41st Av N and the Gedney Pickle Factory site at 31st Av N.
Figure 7.1 This map should also be updated to include properties that are not identified as MPRB-owned, such as the Ramsey Excavating and the Pickle Factory sites.

**Easements, p 7-4**
This section needs several updates.

- It describes seeking future easements and trail development on Xcel property, which has been removed from the ATF regional park boundary in this plan.
- It states that the Xcel-owned transmission pylons do not conflict with park development and use, yet the UHT concept plan in the appendices includes moving these structures back to the railroad tracks.
- Discussions with Graco regarding a potential trail easement are described as ongoing, but in Chapter 6 they are described as completed.
- The East Bank Trail is described as proposed, but it has already been constructed.

**Chapters 8, 9, 10, 11**
No comments

**Ch 12 Implementation, Costs and Funding**

**Near Term Priorities, p 12-2**
The 26th Av N Overlook should be added to this list.

**Hall’s Island, p 12-2**
This section should say something about future improvements, such as bridges and a trail.

**Appendix A Upper Harbor Terminal**

This section does an excellent job of summarizing the four-year process undertaken by MPRB and the City to plan for future use of the UHT site. A lot of really good work has gone into this planning effort, and while we appreciate the work of all the parties involved, we are disappointed with many components of the concept plan approved earlier this year by the City of Minneapolis.

With respect to how the UHT concept plan described here affects the ATF Regional Park Plan, our concerns are as follows.

**Park Boundary, p A-5**
We would like to see more of the UHT site be used as parkland. The 2013 draft plan included a much bigger park of approximately 28 acres and that has been reduced to less than 20 acres. We believe this is short-sighted and would prefer to see a larger park that can leverage more private development outside of the city-owned land. We have repeatedly asked the City to study a larger area of land that includes all the parcels between I-94 and the UHT/river. These landowners outside of the UHT stand to gain considerable property value once the park is added, and it would be to their benefit to participate in a process that encompasses the whole area.
Park Concept Plan, p A-7
We are very concerned that the concept plan includes private development between the river and the parkway. The summary on page A-5 describes a process in which there were mixed views about whether or not this would privatize the riverfront. While we understand that there are diverse opinions about this, we don’t understand why the City and MPRB would consider it when it so blatantly defies a precedent that makes the Minneapolis Park System stand out from other cities. We would like to see both MPRB and the City adopt policies to ensure that land between the river and the river parkway be publicly owned and utilized.

We would also prefer a performing arts center that is publicly owned and provides greater benefits to the community. One way to accomplish this would be to have a music venue that is smaller than what has been proposed and is part of the park system. A smaller venue would be much more compatible with the planned affordable housing on the site, as well.

Thank you again for the opportunity to weigh in on this important planning process. We commend you for your effort and we look forward to continuing our partnership to plan and implement continuous parks and trails along the river north of downtown.

If you have additional questions or wish to discuss the content of this letter, please don’t hesitate to contact us.

Sincerely,

Irene Jones
Senior Policy Advocate
River Corridor Program