



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

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September 18, 2019

Menaka Mohan, Ford Site Planner
City of St. Paul
25 West 4th Street
St. Paul, MN 55102

Re: Friends of the Mississippi River comments on the Ford Site AUAR & Mitigation Plan

Dear Ms. Mohan,

Thank you for the opportunity to comment on the Ford Site Draft Alternative Urban Areawide Review (AUAR).

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 has been working with the city of Saint Paul and other stakeholders for many years to plan for and revitalize the Mississippi River Corridor. We have appreciated opportunities to work in partnership with St. Paul, and we look forward to continuing to have a productive relationship with city staff and leadership moving forward. We also keep a close eye on how development impacts the National Park, in order to ensure that the outstanding scenic qualities of the confluence area, also known as B'dote, are preserved for all to enjoy.

FMR staff has reviewed the Ford Site AUAR and Mitigation Plan and we are mostly satisfied with the document but there are a few specific items that still give us cause for some concern. Our comments and suggestions are as follows.

Permits and Approvals Required

If the city has adopted a new Mississippi River Corridor Critical Area (MRCCA) ordinance, permits may be needed for vegetation removal on and near steep slopes. (Page 12)

Land Use

The description of MRCCA and the Mississippi National River and Recreation Area (MNRRA) on pages 13-14 is dated with references to Executive Order 79-19, whereas the description on page 16 refers to the new MRCCA rules and St. Paul's recently adopted MRCCA Plan. This may have been done on purpose, but it is somewhat confusing. The new rules should be referenced in both places. (Pages 13-16)

Geology, Soils, and Topography/Land Forms

The Dorerton-Rock outcrop complex described in Table 6 has a slope of 25-65 percent. According to the new MRCCA rules, this area may need to be defined as a bluff and be protected as a primary conservation area. (Page 24)

Fish, Wildlife, Plant Communities, and Sensitive Ecological Resources (Rare Features)

This section focuses on potential impacts to rare, threatened or endangered species, but it also needs to address "other sensitive ecological resources." Specifically, we'd like to see this section address potential impacts to birds and wildlife that use the Mississippi River corridor for migration. The Mississippi River is an internationally significant migratory "flyway" used by 60% of all neo-tropical bird species and 40% of North American Waterfowl and Shorebirds.

Migratory birds can be impacted by glass buildings, which they fly into because of the reflection, and by artificial lighting, which confuses their sense of direction. We recommend discussion of these potential impacts in the AUAR and including the use of appropriate lighting and "bird-safe" glass as mitigation strategies.

The AUAR describes adding pollinator habitat for bees, but providing habitat for birds is equally important. Development along Mississippi River Boulevard should allow space for canopy trees as well as native shrubs and other native landscaping. The open space within the hairpin turn could be dedicated to providing additional bird habitat.

Visual

The AUAR does an inadequate job of addressing potential visual impacts. The discussion on page 42 includes reference to the Public River Corridor Views (PRCVs) identified in the city's recently adopted MRCCA Plan, but it only names one view—"View#5 Ford Dam Overlook," and it fails to name other PRCVs that could be affected, such as "View 4 Hartford Avenue Overlook"

The Hartford Avenue Overlook description states:

"Downriver are views of the Ford Bridge. There are no buildings that impede the views at this location, providing an excellent and tranquil location to enjoy nature and the views of the forests that run the length of the Gorge Reach."

The following PRCVs from other communities should also be identified in the AUAR:

- Mississippi Gorge Regional Park
- Minnehaha Regional Park Wabun Picnic Area
- Minnehaha Creek Confluence
- Fort Snelling Historic Site

In reference to the city's new MRCCA Plan, the AUAR states:

“Neither of the proposed scenarios are located in the view range of PRCV and, therefore, will not have an impact on any identified significant public views, which is consistent with Policy CA-11. Additionally, the proposed building heights and setback are consistent with the requirements of the MRCCA Districts and Ford MP zoning. The proposed building heights are lower (20-48 feet) along the Mississippi River front and gradually increase in height farther into the study area, which supports Policy CA-13.”

In addition to our concern that only one PRCV is referenced here, we also disagree with the language that states the building heights are consistent with MRCCA requirements. Some of the proposed buildings within the MRCCA rules' RTC (River Towns and Crossings) District are planned to exceed the 48-foot height limit.

The AUAR should emphasize the need for a visual impact study to be provided when the developer makes their application. They will have to get a CUP or variance from the existing 40-foot height limit, because it's part of the city's existing MRCCA ordinance, which is separate from the Ford master plan.

FMR's main goal is to ensure that the potential visual impacts are robustly evaluated so the public can see how the development's height, shape and materials will impact views from the PRCV sites mentioned above. So far, the visual studies we have seen for the Ford zoning plan look ok, but a final version of the actual project design should also be studied.

We are also concerned that no mitigation strategies have been identified for potential visual impacts. At the very least the mitigation plan should include the use of vegetative screening and minimizing visibility of roof materials during leaf-on conditions.

Transportation

The transportation section of the AUAR does little to address potential impacts to Mississippi River Boulevard, which is likely to get more traffic once the development is occupied. We suggest that the mitigation plan include the following:

- Realign Mississippi River Boulevard at the hairpin turn to create more public open space and/or to restore Hidden Falls
- Reduce the parking lot pavement near the hairpin turn or move it away from the bluff to create more public open space at the bluff top
- Improve bike trail and bike facilities along Mississippi River Boulevard

Thank you again for the opportunity to weigh in on the Ford Site AUAR. If you have additional questions or wish to discuss the content of this letter, please don't hesitate to contact us.

Sincerely,

A handwritten signature in black ink, reading "Whitney L. Clark". The signature is written in a cursive style with a large, looping initial "W".

Whitney L. Clark
Executive Director