



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

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September 18, 2020

Dear Planning Commissioners:

Thank you for the opportunity to comment on the development proposal for 2025 West River Road.

For over 25 years, FMR has taken a particular interest in the Above the Falls region of North and Northeast Minneapolis. The disparities in this area's river access and contiguous riverfront trails are connected to other disparities such as income, health, and racial and environmental injustice. We stand alongside residents who advocate for a future that reconnects neighborhoods to their riverfront as industrial uses move elsewhere.

Early North Minneapolis riverfront redevelopments, such as this one, will set the tone for the decades of future development we anticipate as the Northside riverfront transitions away from industrial uses. We hope that the riverfront will welcome and reflect existing North Minneapolis residents, serving as an extension of the Northside rather than of the North Loop.

When a riverfront project seeks a Conditional Use Permit, we hope to see something exceptional in exchange. We don't believe this proposal meets that bar. The project lacks commercial space and a recognition of its special status as gateway to the riverfront and the neighborhood.

### **Commercial activity missing**

We strongly believe that public-serving commercial activity should be a priority for this site. As commissioners noted during a COW review of this project in February 2020, this site sits at a major intersection that's an important gateway to North Minneapolis and to the Mississippi riverfront. It's a midpoint between existing commercial nodes along Broadway Avenue on both sides of the river and could serve as a connection between those.

Moreover, the loss of Broadway Pizza as a rare sit-down restaurant in the neighborhood is acutely felt. This proposal does not respond to these concerns. We encourage the Commission to continue seeking a first-floor commercial use in this project. We note that Schaefer-Richardson's nearby North Loop project, The Redwell, does include first-floor commercial activity (while maintaining a similar level of rent affordability).

City plans for this area consistently note the desirability of mixed-use development and commercial activity. If the city lets this opportunity pass, *when are we going to start holding a higher standard for*

*the North Minneapolis riverfront?* When, if not now, will we begin developing the riverfront in a way that promotes vibrant neighborhoods, walkability, and economic vitality?

### **Critical Area considerations**

Although Minneapolis will not adopt its new Mississippi River Corridor Critical Area (MRCCA) ordinance until later this fall, we encourage the Commission to make decisions, when possible, in the spirit of this forthcoming ordinance.

As currently drafted, the MRCCA ordinance will require CUP requests to be accompanied by a written analysis of how the CUP is consistent with the character and purpose of the site's Critical Area designation. This should include some discussion of how a project relates to and enhances the Mississippi riverfront. While this may not be required right now, the Commission should expect the developer to demonstrate an understanding of good riverfront urban form in its request for a CUP.

This project exceeds the height limit in both the current ordinance and in the forthcoming MRCCA ordinance. The anticipated Critical Area UM2 subdistrict here will have a building height limit of 42 feet; this proposed building height is nearly twice that. Excessive height does not allow for tiering, as required in the forthcoming ordinance for the CA-UM district, and limits the potential for future river-oriented development west of the site.

In the forthcoming ordinance, CUPs will be contingent on the use of mitigation strategies "related to and proportional to the impacts." In cases of excessive structure height, such as this, mitigation strategies could include tiering the upper floors away from the river or using natural-looking building materials that reduce visual impact. This project does not include these.

Given this site's presence in a major international migration flyway, another mitigation strategy for the building's excessive height could be a commitment to using bird-safe glass and lighting design. FMR strongly urges that this be made a condition of project approval.

We do appreciate the modest improvements to the river-facing side of the building that have been made in response to feedback. Balconies, green space, and a resident patio area will contribute to a more inviting riverfront. To this end, we do support the requested variance for a larger setback along West River Road.

### **Housing costs**

The inclusion of 3-bedroom units in this development is laudable. The level of affordability provided by this project may help meet a regional need, though it will not meet North Minneapolis residents' affordable housing needs as rents will be above the existing market rate for the neighborhood.

While we believe that mixed-income communities are the most resilient, FMR is concerned about bringing higher-cost housing into a vulnerable area while the homelessness, displacement, and housing affordability crises continue to challenge our city and region.

This project will set important precedents for future Northside riverfront development. We encourage the Commission to deny the CUP for this development until it is revised to be more aligned with the city's goals for this important gateway location and includes mitigation strategies proportionate to the CUP and variances being requested. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Colleen O'Connor Toberman". The signature is written in a cursive style with a light grey rectangular highlight behind it.

Colleen O'Connor Toberman  
River Corridor Program Director

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September 3, 2022

Dear Planning Commissioners:

We are writing with comments and concerns about Schaefer-Richardson's proposed development at 2025 W. River Road.

For over 25 years, Friends of the Mississippi River (FMR) has taken a particular interest in the Above the Falls region of North and Northeast Minneapolis. The disparities in this area's river access and contiguous riverfront trails are connected to other disparities such as income, health, and racial and environmental injustice. We stand alongside residents who advocate for a future that reconnects neighborhoods to their riverfront while avoiding involuntary displacement.

### **Setting the stage for future development**

Early North Minneapolis riverfront redevelopments, such as this one, will set the tone for the decade of future development we anticipate as the Northside riverfront transitions away from industrial uses. We hope that this riverfront will welcome and reflect existing North Minneapolis residents, serving as an extension of the Northside rather than of the North Loop.

When a project seeks a Conditional Use Permit and TIF, as this one is, we hope to see something exceptional in exchange. We don't believe this proposal meets that bar. The project lacks commercial space, deeply affordable units in line with North Minneapolis incomes, and a recognition of its special status as gateway to the riverfront and the neighborhood.

### **Lack of commercial activity**

Most notably, this project lacks any kind of commercial or public use. We strongly believe that public-serving commercial activity should be a priority for this site. As commissioners noted during their reviews of this project, this site sits at a major intersection that's an important gateway to North Minneapolis and to the Mississippi riverfront. It's a midpoint between existing commercial nodes along Broadway Avenue on both sides of the river and could serve as a connection between those.

Moreover, the loss of Broadway Pizza as a rare sit-down restaurant in the neighborhood is acutely felt. This proposal does not respond to these concerns. We encourage the Commission to continue seeking a first-floor commercial use in this project. We note that Schaefer-Richardson's nearby North