



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

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Mary deLaittre, Executive Director  
Great River Passage Conservancy

Andy Rodriguez, Director  
City of St. Paul Parks and Recreation

June 14, 2022

Dear Andy and Mary:

We write to you with serious concerns about and strong opposition to the current direction and design of the River Learning Center at Crosby Farm Park.

Friends of the Mississippi River has publicly supported the goal of a nature-oriented River Learning Center (RLC) in Crosby Farm Park for over a decade. We participated in the creation of the Great River Passage Master Plan and have remained closely involved in the RLC development process since. In past years, we've urged our supporters to champion RLC bonding to their legislators.

We value our partnerships with the city of St. Paul and the Great River Passage Conservancy, as well as RLC partners the National Park Service (NPS) Mississippi National River and Recreation Area, Wilderness Inquiry, and Mississippi Park Connection. Together, we have accomplished many great things for the Mississippi River, St. Paul residents, and our larger community. We anticipate continued fruitful work together.

However, the RLC design schemes presented to the community on June 9 have forced us to state our public opposition to the RLC project as it stands today; we share our reasons below. This project seems to have veered far off of the course set by the Great River Passage Master Plan and by promises your organizations have made to FMR and other stakeholders for many years. It's no longer clear what the goal of this project is or how decisions are being made.

We have so many concerns about all three of the alternative schemes that at this time we cannot support any of them. We urge you to make significant revisions and present multiple new alternatives (not just one final concept) for community feedback. We hope that you will put this project back on its proper path and work to rebuild stakeholder trust in your process.

Furthermore, we're aware that both the Minnesota Department of Natural Resources (DNR) and NPS made strong comments about these schemes' viability and legality weeks before they

were shown to the public. We are dismayed that the city and project team insisted on making these schemes public despite knowing that they were unbuildable. We cannot understand why you did this.

### **Building size and uses**

The buildings in all three alternative schemes are grossly oversized and inappropriate for the regional and national park setting.

The original premise of the River Learning Center was a gathering space for river-related education and recreation programs. FMR has strongly supported this idea. We also accepted that a modest NPS headquarters could help make the project financially viable and increase our national park unit's visibility. For years, we have been promised that the RLC would be "light on the land."

The design schemes have disregarded this original vision to a stunning degree. Somehow, the project concept has evolved to include enormous structures in which over 80% of the building space is being used for offices, warehouses, and other uses not directly related to the River Learning Center's original purpose. Only 8,000 of the proposed 43,400 square feet of building space are shown as being for the River Learning Center. *What is the goal of this project, and when did the community give consent to this size and scope?*

This precious site is a jewel in the city and national park systems. It is inappropriate to build office buildings and warehouses that could be located nearly anywhere else. Wilderness Inquiry does not need to outfit its worldwide trips from a warehouse right here. Your Boat Club does not need its regional offices right here. NPS does not need its entire storage facility right here. Yet all of these uses are being presented as part of the project.

These agreements appear to have been made behind closed doors without any public discussion whatsoever. When was the size of the marina discussed with any stakeholder other than Your Boat Club? How was Wilderness Inquiry's operations warehouse sited at the site without public discussion? It's not even clear what's included in the dedicated RLC space or who is being consulted about what amenities are needed to facilitate learning and recreation. Have there even been detailed discussions about the functional space requirements for the education, interpretation and visitor component of the building and site? Since this is the core purpose of the project and it's ostensible *raison d'être* we would have expected more of the schematic design work to have concentrated on these issues. Instead, the RLC seems an afterthought, shoehorned into a much larger office and warehouse facility with little thought given to how those non-river related uses will affect the visitor experience.

### **Marina size and operations**

The size of the marina is also out of scale with prior community understanding. A 150-slip marina brings with it many functions that might overwhelm the nature- and learning-oriented intentions of the project.

A facility of this size will likely include boat storage, lifts, a repair shop, or other marina uses. (The current boat storage at Watergate Marina is an eyesore, with tall boats wrapped in bright blue plastic, sometimes seemingly for years on end.) A 150-slip marina, along with a day-use launch, is also likely to require big parking lots to accommodate cars and trailers. And it appears that a large amount of office space is being requested as well. This may all infringe on a nature-oriented visitor experience and violate the “light on the land” promise made to the community.

Again, it’s not clear how these decisions were made. Your Boat Club appears to have been given partner status and appears to be planning to locate 14,000 square feet of operations and administrative functions at RLC, all without any public input about whether this scale of marina is needed or appropriate for the future of this site.

### **Mississippi River Corridor Critical Area non-compliance**

The Mississippi River Corridor Critical Area (MRCCA) is the state-designated protection that preceded the creation of the national park. The Critical Area designation was born out of the community’s fight against a prior oversized development proposal at the same site as the RLC. This site is central to the history of metro Mississippi riverfront protections.

FMR led the work to reform MRCCA protections, resulting in the 2016 DNR rules that guide riverfront development today. Each of the 25 cities and townships within MRCCA must adopt an ordinance that complies with these state rules. St. Paul’s draft ordinance is about to be submitted to the DNR to begin the final review and adoption process.

The project team does not appear to have taken these rules and the city’s forthcoming ordinance into consideration. The design schemes assume the ability to violate a brand-new river protection ordinance, which is shocking and wholly inappropriate for this project.

The project team must review the MRCCA rules and draft city ordinance in full, but some of the project concepts raised questions about compliance with these particular MRCCA standards:

- 35-foot height limit for structures, trails, and viewing platforms.
- 40- or 100-foot structure setback from the top of a bluff (requirement varies throughout the site).
- 20-foot setback from the bottom of the bluff (the bluff impact zone).
- 100- or 200-foot structure shoreline setback (requirement varies throughout the site). Exemptions are allowed for water access facilities including marinas, but not non-water-dependent elements such as restaurants, bait shops, or boat dealerships.
- Trails, access paths, and viewing areas must minimize visibility from the river and visual impacts on public river corridor views.

Design elements that are clearly in conflict with these standards include the 100-foot high structure in Alternative 1 and the bluff walk in Alternative 3. In Alternative 2, we question whether a large blufftop building can truly fit in the limited space available while still meeting bluff setback and building height limits. It's also not clear from the images whether the parking and bus drop-off areas on the bluff side of the building are outside of the bluff impact zone.

We know that the project site has some challenges related to entrance visibility, ADA-compliant bike/pedestrian access down the bluff, multimodal access and parking, and other needs. However, we believe that these constraints can be resolved in many other ways than the current schemes, and particularly if the buildings are scaled back to a size appropriate for the original intention of the RLC.

*No RLC design should include any need for MRCCA variances.* A city-sponsored building and NPS headquarters must be a shining example of appropriate, MRCCA-compliant riverfront development. The precedent set by the RLC is not just for St. Paul, but for the 24 other communities also adopting and applying their new MRCCA ordinances. Any variances for RLC will be used as an argument in favor of variances for other projects along 72 miles of the river, eroding the protections granted by these new MRCCA rules.

We understand that the DNR has clearly stated that key elements of the RLC concepts are a "red flag" for their non-compliance with MRCCA rules and other state regulations. NPS has also clearly stated their objections. We cannot comprehend why these designs that are clearly unbuildable, and would likely lead to legal action against the city should they be approved, are still being shown to the public. *Why would the city promote designs that are blatantly illegal under the city's own ordinances?*

### **Island creation**

While we understand the recreational appeal of creating an island on land that is already heavily disturbed, we question the cost to create and maintain it. Construction and ongoing dredging are likely to cost millions of dollars and it's not clear how that would be paid for. We would ask, is the benefit worth the cost?

The DNR has noted that public waters rules will also subject any harbor filling or excavation to specific standards that this project may not be able to meet, particularly as relates to upland creation.

In addition, the island has been described as both a habitat refuge and a recreational amenity. It's unlikely that one small island can fulfill both functions well. Heavy human visitation will eliminate much of the habitat function of the site. If the island concept is to be included in future revisions, it should be presented as being primarily for human or wildlife use, not both, as to not mislead the community about what the island can provide.

### **Community input disregarded**

Throughout this design process, we're seeing a consistent theme of disregarding community input and making major decisions behind closed doors.

RLC engagement began over ten years ago. When community members and elected leaders have asked FMR about our perspective on the project, we've offered our support and shared the city's promise that the RLC would be light on the land.

Those promises have been broken with these grossly oversized buildings filled with inappropriate uses. Furthermore, the project team has not presented one shred of evidence that the public supports this kind of design.

Community surveys, meetings, and focus groups with a diverse range of residents have shown consistent public support for low-impact, nature-based experiences in a quiet, river-oriented setting. We recall that the April 2022 community meeting drew vigorous debate among attendees about whether even a playground structure would be appropriate for this setting.

*We cannot understand how this community input resulted in a proposal to build 43,000 square foot building housing offices and a warehouse.*

There does not appear to be community support for a project of this scale. The DNR and NPS both told you—weeks before these design schemes were shown to the public—that this project is out of compliance with even the most basic of development standards and river protections. You were asked to redesign this project accordingly before showing the schemes to the public. And yet, for reasons we cannot comprehend, you pressed forward with a public review process for designs that will never—can never—be built.

The city's mismanagement of this process and design team's inability to produce viable concepts are leading the RLC down a path of failure. Thus far, the schematic design process has wasted money, broken community and partner trust, and disregarded state and city regulations. This will damage the project's fundraising prospects and public support.

We urge you to course-correct immediately by withdrawing the presented schemes and creating multiple new viable, legally compliant schemes for robust community and partner review. FMR remains eager to see the original vision for the RLC brought to fruition and we hope to work with you towards that goal.

For the river,



Whitney L. Clark  
Executive Director



Colleen O'Connor Toberman  
Land Use & Planning Program Director

CC:

Tucker Blythe, National Park Service - Mississippi National River and Recreation Area  
Anne Gardner, City of St. Paul Parks and Recreation  
Senator Erin Murphy  
Katie Nyberg, Mississippi Park Connection  
Representative Dave Pinto  
Erika Rivers, Wilderness Inquiry  
Dan Scollan, Minnesota Department of Natural Resources  
Russ Stark, City of St. Paul Mayor's Office  
Councilmember Chris Tolbert, City of St. Paul