



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

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July 21, 2021

Re: File #21-282880, 2285 Hillcrest Ave.

Dear members of the Board of Zoning Appeals:

We are writing to share our feedback on Project for Pride in Living's (PPL) River Corridor Overlay District height variance request at Highland Bridge. We find the height variance request to be reasonable and unlikely to result in negative impacts to the Mississippi River Corridor Critical Area (MRCCA).

Friends of the Mississippi River (FMR) is a non-profit organization with a mission to engage community members and other stakeholders to protect, restore and enhance the Mississippi River and its watershed in the Twin Cities Region. We represent thousands of people in the metropolitan area who care deeply about the river, including a growing membership of over 2,700 people and more than 3,200 volunteers and 2,000 advocates engaged each year.

FMR has been a vocal supporter of dense redevelopment of the former Ford site; we believe that density is one crucial strategy to fighting climate change. We have collaborated with the city for many years to agree on height limits and design standards that facilitate dense development while also protecting scenic views and enhancing the public realm. The Mississippi River is a tremendous asset to us all—and the riverfront should be managed in a way that respects the river's significance to our entire community.

Visual impacts unlikely

This proposed building has the unique circumstance of sitting in two different MRCCA districts. The MRCCA district boundaries follow the line of the river bluff, resulting in diagonal boundaries across the new Highland Bridge street grid. Half of this parcel is in the River Towns and Crossings (RTC) district, which will be subject to a 48' height limit in the city's forthcoming MRCCA ordinance. The other half is in the Urban Mixed (UM) district, which will have a 65' height limit. This is a relatively uncommon situation because most MRCCA boundaries were drawn along preexisting street grids.

As you may recall from our comments on other Highland Bridge height variance requests in December 2020, FMR looks to a performance standard when evaluating height variances. We

ask: Will the new development be visible from the river, and if so, how much? The scenic views in this area are among the finest the Mississippi River has to offer. This area is the only gorge along the river's entire length.

We find that the applicant's height variance request is reasonable and is unlikely to have any negative impacts on MRCCA resources. The applicant's view analysis shows that this building will likely not be visible from river overlooks or the opposite shoreline. We appreciate that the building's mechanicals are located primarily inside the building, and that the rooftop elements are on the part of the building within UM district (with a higher height limit). This helps reduce any scenic impacts.

If this building were to have a significant impact on scenic views or were mostly located in one district, FMR may make a different recommendation. We encourage the BZA to document its decisions in a way that allows you to weigh future requests against the same criteria.

Thank you for your attention to these important issues. We look forward to working together as development continues at Highland Bridge. If you're interested in learning more about the forthcoming MRCCA ordinance, we have extensive maps, handouts, videos, and other resources available at www.fmr.org/river-rules.

For the river,

A handwritten signature in black ink that reads "Colleen O'Connor Toberman". The signature is written in a cursive, flowing style.

Colleen O'Connor Toberman
River Corridor Director
ctoberman@fmr.org, 651-222-2193 x29