



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

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June 20, 2019

Mayor Warren Peterson, City Councilmembers, and Planning Commission Members
City of Lilydale
1011 Sibley Memorial Highway
Lilydale, MN 55118

Dear Mayor Peterson and city councilmembers,

We are writing to follow up on our April 23 and May 9 letters about proposed development at the River Bluffs Center site. Since our last letter, we have reviewed Opus' revised concept plan and met with Opus staff to discuss their project. We have also spoken with Lilydale residents who have expressed concerns about various aspects of the project.

We appreciate the improvements made in the revised concept plan, particularly the improved bluff setback. The building still encroaches on the required 40-foot bluff setback, though significantly less than it did in the previous plan. The parking lot still includes significant bluff encroachment. The building also still exceeds the height limit allowed by city ordinance.

Our serious concerns about the site's stormwater management plan persist. Climate change is bringing about more extreme rainfall events, making stormwater management more critical than ever. A sufficient stormwater plan will prevent water from being discharged over or near the top of the bluff. Any blufftop discharge will accelerate erosion, leading to a heightened risk of landslides, damaged infrastructure, and ecological harm.

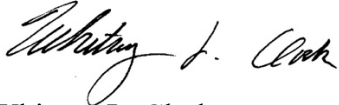
Should the council choose to approve Opus' revised concept plan, we recommend that the following conditions be placed:

- The coordinated plan will include a detailed stormwater management plan that prevents water discharge on or near the top of the bluff.
- The coordinated plan will detail mitigation measures for the building's bluff encroachment and excessive height, including landscaping, revegetation, and preservation of existing vegetation.
- The coordinated plan will include building design elements that reduce the building's scenic impact on the river wilderness, such as a flat roof and façade materials that complement the natural environment rather than distract from it.
- The coordinated plan will include view analyses to show the scenic impact of the building from locations on the opposite bank of the river and within the Lilydale Regional Park.

- Future plan iterations will not increase building height (including increased height where tiering back from the river is currently proposed) or bluff encroachment.
- The city engineer will review the demolition plan for the existing structures to ensure that the demolition does not result in further bluff damage.

We appreciate the city's thoughtful involvement with this project. We plan to continue our involvement, as well. Thank you for your work on behalf of Lilydale's residents.

Sincerely,

A handwritten signature in black ink, appearing to read "Whitney L. Clark". The signature is fluid and cursive, with the first name being the most prominent.

Whitney L. Clark
Executive Director