

Memorandum

To: Ford Site Task Force members
From: Whitney Clark, Executive Director, Friends of the Mississippi River
Paul Labovitz, Superintendent, National Park Service, MNRRA
Frank Jossi, Chair, Land-use & Transportation Committee, Sierra Club North Star Chapter
Re: Mississippi River Issues Related to the Ford Site
Date: 5/17/07

Thank you for the time you are giving to the Ford Site planning effort. As you know, this is a once in a lifetime opportunity to shape the redevelopment of this important property. As agencies and organizations concerned with the protection and stewardship of the great Mississippi River, we have followed the planning effort with interest and have identified a few issues that we view as unique opportunities or specific concerns. We offer the following thoughts as you begin to consider the various redevelopment scenarios and compare and contrast their features.

Public Open Space

We believe the Ford Site redevelopment offers a tremendous opportunity to add protected riverfront open space to the regional park system. This can be accomplished by converting the existing riverfront parcel (currently west of Mississippi River Boulevard) to public ownership and by realigning the parkway to the east, thereby creating additional bluff-top parkland. While we know that ball fields, tot lots and other neighborhood parks will enhance the livability of the neighborhood, we would hope to see the majority of the redeveloped area's open space concentrated in contiguous riverfront open space.

Scenarios #8 and #10 offer constructive suggestions for the possible realignment of Mississippi River Boulevard (MRB) in order to create a bluff-top park and overlook that can be accessed without having to descend the road or stairs to Hidden Falls Park. We understand the importance of retaining ball fields within the redevelopment area. However, we would prefer that because these activities have no relation to the river that they not be located within the riverfront park, as they are shown in scenario #9.

Building Heights and Scenic Views

In its entire 2,400 mile length the Mississippi River has only one gorge, a ten-mile reach stretching from Saint Anthony Falls to the confluence of the Minnesota River. Characterized by towering 100-foot limestone bluffs and steep wooded ravines, this unique geologic feature was created by the recession of Saint Anthony Falls as it eroded upstream over the last 10,000 years.

The scenic views to and from the river from numerous points throughout the gorge are part of the public trust that has been explicitly preserved for generations by maintaining building height restrictions that preventing structures visible above the tree canopy from being built in the river corridor.

The existing State Critical Area law, which has been incorporated into Saint Paul's zoning ordinance, allows for development within the Critical Area boundary but restricts building heights to protect the river's public scenic value.

We strongly urge the task force to recommend maintaining height restrictions within the Critical Area to protect this important public value.

As you may know, another City-appointed task force has been working for more than two years to recommend updates and revisions to Saint Paul's existing Critical Area overlay zoning. This group has been very cognizant of the impending Ford Site redevelopment and has recommended changes that provide for greater density while still protecting the river's scenic assets.

Residential high-rise towers within the Critical Area such as those proposed in scenario #9 would likely be visible from boaters on the river and hikers and joggers on bluff-top trails on both sides of the river for many miles upstream and down.

Certainly, transit-oriented densities can be achieved while still respecting the Critical Area height limits, and the portion of the Ford site that lies outside the Critical Area could accommodate point towers if even greater density were deemed necessary to accomplish other public objectives of the redevelopment.

Stormwater Management

The 136-acre redevelopment of the Ford site offers the City a wonderful opportunity to dramatically improve the functioning of the current site from a water quality standpoint. But perhaps more significantly we hope that the Ford redevelopment will set a new citywide standard for stormwater management and raise the bar for other cities along the river.

We urge the task force to push for designs that maximize the utilization of Low Impact Development (LID) practices that mimic or re-establish the pre-development hydrologic functions of the site. As soil conditions allow, pre-treatment and infiltration should be emphasized. Since an entirely new street grid will need to be constructed on the site, we believe this is a unique opportunity for the City to employ publicly-owned and maintained infiltration trenches under the streets. Infiltration trenches can reduce runoff volumes by 90% or greater depending on soil conditions and can be even more efficient at pollutant removal.

Another important goal of the redevelopment should be to reduce impervious surfaces wherever possible. Green roofs, pervious pavement, minimizing street widths and other

impervious areas are all good ways to reduce the volume of stormwater runoff that the site generates.

Retaining Corridor Right of Way for Future Transit and River Crossing at Ford Parkway

While it may be many years before a light rail connection between downtown Saint Paul and the airport is on the drawing board, we believe it is important to preserve the option of crossing the river at Ford Parkway/46th Street rather than forcing the future construction of a new bridge in another location to accommodate transit. Retaining the existing CP Rail right of way would preserve this option. In the meantime the right of way could accommodate a new road and trail access into the site.

A new crossing of the Mississippi River gorge somewhere between the Ford site and Highway 5 would massively degrade this incredibly beautiful and historic reach of river and it could have significant ecological impacts as well. Prudent planning and foresight at this point can preclude this potential negative future outcome. We understand that the existing Ford Bridge would not be structurally suitable to accommodate light rail trains but if a transit crossing is required at some future date we believe the Ford Parkway/46th Street corridor would minimize degradation of the Mississippi's scenic and natural environment.

Building Setback from Mississippi River Boulevard

Whatever the eventual alignment of Mississippi River Boulevard, we urge the task force to consider recommending the establishment of a building setback east of the public right of way to buffer the transition from public to private space and ensure continuity with the parkway to the north and south. Scenarios #8 and #10 offer illustrations of how this approach accomplishes the objective of locating MRB within the park rather than alongside it.

Neighborhood connections to the Mississippi River

The Mississippi River its adjacent parks and trails are undoubtedly one of the greatest assets of the Ford site. We believe that extending the scenic, natural and recreational benefits of the river throughout the redevelopment area should be a central goal of any recommended plan. Indeed, many of the scenarios you are considering do just that. Scenarios #2, #8 and #10 all show variations on a network of tree-lined, pedestrian-friendly streets that extend through the development and connect to MRB. If well-designed these streets could signal to pedestrians 4 to 6 blocks from the river that they are near to and can easily get to this world-class river.

If reducing traffic and congestion on MRB is desired some of these connector streets could come to a T at a tree-lined park buffer east of MRB as is done in numerous locations on West River Parkway in Minneapolis. This has the benefit of providing an inviting pedestrian and view corridor to the river without requiring intersections on MRB.

Other Issues for Consideration

The following issues, while not necessarily before you at this time, have come to our attention and we offer them for your consideration.

- Architectural and streetscape design guidelines:
Careful consideration should be given to how the City can constructively guide architectural and landscape design on the site so as to minimize visual intrusion on the public riverfront land and maximize continuity with existing adjacent neighborhoods. As we consider the important ramifications of land-use decisions it is also important to remember that how places are designed may be as significant as what the use is and where it is located.
- Timing of environmental review (AUAR) and Phase II pollution investigation:
We are concerned that the planned environmental review of the scenarios could be allowed to proceed without the results of the Phase II pollution investigation results. We would hope that any potential pollution issues that are identified would be brought to light in time to incorporate them into the environmental review.
- Historical significance of Ford buildings:
We are aware that some of the existing Ford buildings may have historic significance. We encourage the task force to explore the historic significance and consider options for preservation, re-use and interpretation of these resources. Staff from the National Park Service are happy to work with site planners to further explore this opportunity.
- Potential future use of the steam plant:
We understand that the existing riverfront steam plant may have some potential for reuse including, possibly, for the utilization of biofuels for district heating. We would prefer that this important parcel not be used for the heavy industrial activities once the Ford plant has closed.
- Vegetation guidelines:
As plans unfold for some combination of open space, residential and commercial development, we would urge the City to develop vegetation guidelines for the site that address wildlife benefits, energy conservation, soil conservation and natural beauty. Bluff-top plantings should consider the importance of screening buildings from the river and key vantage points along the gorge. Native plants that maximize benefits to wildlife, especially birds should be utilized to the greatest extent possible. Assistance in discussing options is available from a variety of partner organizations and agencies.