

August 1, 2006

Minneapolis Heritage Preservation Commission 210 City Hall 350 South 5th St. Minneapolis, MN 55415

## Dear Commission Members:

The Sierra Club is the oldest and largest grass roots environmental advocacy organization in the United States. Minnesota's North Star Chapter is comprised of over 22,000 members who support the protection of natural resources.

Thank you for the opportunity to provide public comment in regards to DeLaSalle High School's application to the HPC for a Certificate of Appropriateness for the proposed athletic facility located adjacent to their school on Nicollet Island. For the reasons stated below, due to the inadequate consideration of alternatives to the Proposal, and because implementation of the Proposal would likely lead to significant environmental and social impacts, the Sierra Club believes that an athletic facility is not appropriate for Nicollet Island due to its scale and proximity to the Mississippi River.

All of the land on Nicollet Island, except the DeLaSalle property, three multi-family residential structures, and the existing rights-of-way, was acquired to create a regional park for the benefit of all the people of Minneapolis and surrounding communities. Furthermore, the park is surrounded by a segment of the Mississippi River that has been designated as a "State Critical Area." If the publicly owned open space on Nicollet Island were restored to parkland habitat, it would provide a conservation and recreational "jewel" amidst a densely populated and highly developed urban and historical area. In contrast, the Proposal would destroy a prairie grass meadow that contains more than 30 trees that were planted to commemorate the 150<sup>th</sup> anniversary of the University of Minnesota.

Additionally, the new facility would introduce a new activity with seating for 750 spectators, lights, and loudspeakers – all of which do not currently exist on this island. The field lighting would be mounted on 70 foot poles, and the applicant acknowledges that the lighting would be visible off site and would intrude on the view of the downtown skyline in the vicinity of the project. Not only will the noise and lighting be problematic for neighboring property owners and visitors, they would likely impact and disrupt migratory and nesting birds on Nicollet Island. It is noteworthy that Nicollet Island is located along the migration route of more than 60% of all North American bird species and over 40% of all North American waterfowl.

An athletic facility on this site also would expand imperious surfaces and water run-off into the Mississippi River. Our concern is not only for the lawn chemicals required for the field, but for the parking areas that will be paved adjacent to the river's edge. The Proposal does not adequately address water run-off and pollution prevention measures. Currently run-off is piped directly into the Mississippi River. Consequently, homeowners in the area of the run-off from a new field would exponentially increase water flow into their foundations and basements.

The Sierra Club is greatly concerned that alternative building sites, both on and off Nicollet Island, were not discussed that would generate fewer environmental and social impacts. Overall, the scale of the proposed athletic facility is too large for the available land, as was noted by two landscape architects that served on the Citizen's Advisory Committee. The visual impacts are not compatible or consistent with the historic designation of the district or with the view shed from the river.

Nor do we believe DeLaSalle has investigated the possibility of sharing facilities with another school. Many urban schools in densely populated areas like Nicollet Island do not have facilities on campus – and some don't even have a playing field. For example, we did some research and found in DeLaSalle's conference that several schools did not play on their own grounds. In fact, of the urban-based schools, Blake plays at Hopkins' high school field, St. Agnes plays at Midway and Minnehaha Academy plays at a stadium on its lower campus. Suburban Mounds Park Academy turns out to play at Saint Paul Academy in a sharing arrangement. Could not DeLaSalle have looked into such a similar arrangement?

Finally, the Proposal would ultimately strip the right to use public land from the citizens of Minneapolis. The Critical Area Plan states that "Nicollet Island should be maintained in a manner which will promote public use and enjoyment for all segments of the population." A Certificate of Appropriateness that is proposed by DeLaSalle High School is not in the best interest of Minneapolis citizens and would limit public access to the recreation area.

As was discussed in our July 15, 2005 letter to the Minneapolis Park and Recreation Board, the Sierra Club acknowledges DeLaSalle's outstanding reputation in the community and its devotion to educating a wide range of teenagers from all income levels. Nevertheless, this is a debate over a valuable piece of open space available now to all citizens of the state, and that would change if this Certificate is approved for the St. Anthony Falls Historic District. There is a much greater need for the preservation of open and recreational space on Nicollet Island, which would be open at all times to use by all Minneapolis citizens.

The Sierra Club urges you to deny DeLaSalle this Certificate of Appropriateness. The restoration of Nicollet Island for its parkland and historical value is too valuable to the citizens of Minneapolis and for future generations to be developed for private use in this

manner. Again, thank you for your consideration in reviewing these comments. Please feel to contact us if you have any questions.

Sincerely,

## Frank Jossi, Co-Chair

Land Use and Transportation Committee Sierra Club North Star Chapter Sharell Benson, Co-Chair

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Cc: Katie Simon-Dastych Jon Olson Diane Hill McCasey