



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

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Friends of the Mississippi River (FMR) appreciates the opportunity to share our comments on the Upper Harbor Terminal (UHT) draft coordinated plan.

FMR has been involved in planning for the future of UHT for decades, even co-sponsoring a UHT design charette with the city in 2004. Our staff have closely followed the recent planning processes, including observing nearly every city Collaborative Planning Committee meeting and serving as a member of the Minneapolis Park and Recreation Board's Community Advisory Committee for the UHT park.

We believe wholeheartedly that North Minneapolis deserves robust, creative community investment and development. We'd love to see that happen both at and beyond Upper Harbor Terminal, and quickly. Redevelopment ideas should be birthed in the community, led by and primarily benefiting Black and brown neighbors. The current UHT plan simply isn't that. It was created by United Properties and First Avenue, for their own benefit, long before any community process began.

We reject the draft UHT coordinated plan because this project is fundamentally flawed. What could have been a transformative and equitable redevelopment for North Minneapolis is instead destined to benefit the wealthy, white-led development team first and foremost. Minneapolis leaders have a once-in-a-lifetime opportunity to reimagine 48 acres of public land with a mile of Mississippi riverfront and it squandered it on the same old extractive development processes that have never resolved North Minneapolis' persistent racial and economic disparities.

In addition, we believe that the draft coordinated plan has significant gaps that make it impossible to fully assess community impacts and project feasibility. This plan should not move forward when it's still full of so many glaring holes. In particular, **this project should not be voted on until the Alternative Urban Areawide Review (AUAR) environmental review is complete and the public has had the opportunity to consider the impacts.**

Summary of concerns

Our comments are organized into several themes, each of which is discussed in more detail in the following pages.

Lack of environmental review

The city has yet to complete the environmental review (AUAR) for this project. We don't understand the point of voting on a coordinated plan when there is missing information that might significantly alter the project. The city should not be making any decisions on this project without reviewing environmental impacts. By approving a project plan that might need significant changes later to mitigate environmental impacts, the city risks the UHT coordinated plan being another failed promise to the community.

Who benefits? At what cost?

This project represents a massive transfer of public resources to a wealthy, white-led development team. It extracts the community's asset—48 acres of public riverfront land—and hands control and majority benefit, along with \$12.5 million in taxpayer funds, over to private developers.

Despite Minneapolis leaders pledging “change” and “equity” they followed the same old playbook that has never delivered equity for North Minneapolis or Black and brown residents. We cannot keep doing the same things and expecting different results.

Exclusionary and rushed planning process

The “developer first” planning mindset has stifled the ability for the community to have full influence over this project. Several key stakeholder groups were also not included the engagement process. The resulting draft coordinated plan reflects these shortcomings.

In addition to the environmental review, the coordinated plan missing additional key elements including details about purported community benefits and complete information about project elements such as transportation and the community hub.

Insufficient community benefits

The much-touted promises of “community control” and “community benefits” at UHT aren't fully upheld in the plan's fine print. The development team has always had, and will retain, ultimate power over the project.

The draft coordinated plan also makes many promises about community benefits without offering sufficient detail about how the city and the community will enforce these promises.

Community Performing Arts Center monopolizes public funds with questionable return

First Avenue's Community Performing Arts Center (CPAC) is the centerpiece of the plan. It has consumed a significant level of public funding and profoundly limits what else can be built on the site, yet its promised community return is modest at best. Despite the enormous public investment in this project, we still don't know its environmental impacts, what kinds of jobs it will provide, or how financially risky the venture is.

Design considerations and concerns

Several elements of the plan lack the quality design that is merited by UHT's presence along our nation's great river. The plan includes industrial uses and a concert venue that may overwhelm and harm the riverfront park and public realm. In addition, the plan states the city's intention to disregard its own brand-new riverfront design standards. The result is that North Minneapolis will not have the same high-quality riverfront that other parts of the city enjoy.

Lack of environmental review

The draft coordinated plan feels rushed and incomplete. It is missing elements that the 2019 concept plan committed to including, most glaringly the Alternative Urban Areawide Review (AUAR) that will evaluate and propose mitigation for environmental impacts. Community members have consistently raised questions about these impacts, including environmental sustainability, transportation and auto emissions, and noise from the CPAC. These impacts are potentially substantial, but the community is being asked to approve a plan that includes no information about them.

This is especially troubling given the long history of environmental injustice in North Minneapolis. This area has long experienced disproportionate environmental harm, including noise and emissions from I-94 and heavy industry. Why there isn't special care given to providing residents with full transparency about the environmental impacts of this project before approval of the coordinated plan?

Who benefits? At what cost?

FMR believes that the Mississippi River belongs to everyone and that its benefits should flow equally to all. This is especially crucial in North Minneapolis, where a long and painful history has cut off Northside residents from the riverfront. This harm was and continues to be perpetuated by government agencies, including city staff and elected leaders. Industry was

allowed to dominate the riverfront, I-94 carved further separation between residents and the river, and leaders turned a blind eye to the resulting pollution. Then redlining and disinvestment limited the ability of Black and brown residents to live anywhere else.

These problems were already clear, and then 2020 made them even more impossible to deny. We are suffering through a pandemic in which the people on the economic margins are suffering most, along with our small neighborhood businesses. We watched Minneapolis police officers callously murder George Floyd, more evidence that our city's existing practices are incapable of protecting the lives and well-being of Black and brown residents. City leaders have pledged to bring radical change. And through this all, the premise of the UHT development has remained fundamentally unchanged.

Unchanged practices will bring the same old results

Since the release of the draft UHT coordinated plan in August 2018, FMR has believed that this project is fundamentally flawed. The project extracts the community's asset—48 acres of public riverfront land—and hands control and majority benefit over to a wealthy, white-led development team. At this point, we don't see any path to a truly just and equitable development plan as long as the city's exclusive development rights agreement with United Properties remains in place.

It's rare that we have the opportunity to redevelop 48 acres of public land—on the Mississippi River, no less. What happens at UHT will be a catalyst for future land transitions and redevelopment along the North Minneapolis riverfront. Most of that land is privately owned and public influence will be limited. UHT, in comparison, offers a wide-open opportunity to set the tone for the future of the Northside riverfront and to ensure that the area becomes an extension of North Minneapolis neighborhoods rather than the North Loop.

What did city leaders choose to do with this once-in-a-generation opportunity? They opted for a massive wealth transfer to a big, wealthy, white-led development corporation. The development team will not only reap the majority of the benefits from developing public land, but they're even receiving direct public subsidies in the form of \$12.5 million in state bonds for their concert stadium.

Our community's disparities will not be erased through lackluster projects that follow the same racist playbook that got us here. A truly transformative project would place community needs and goals first and foremost, prioritizing community leadership and wealth-building opportunities from the beginning. The UHT planning process has instead attempted to shoehorn in those elements after a concept plan was already brought forward by a wealthy developer and approved by the city council. The largest public subsidy in the project is going to the development team for a privately-operated entertainment venue. Is this really the best we can do?

Public land could deliver more public benefit

FMR is proud to be among the many community members who helped secure the city's commitment to keeping most land at UHT in public ownership. This is an improvement in the development. It was won by community members after city leaders approved a concept plan without any such commitment.

However, it's not clear whether the revised plan for this land—offering 99-year ground leases—really delivers much in terms of community wealth-building. An estimated annual lease revenue of \$250,000 isn't very much money for meeting the community's needs and goals. Without more clarity around how the development team is profiting from this project, we have no way of concretely seeing who's really reaping the majority of the benefits from this redevelopment on public land. If we, the public, own the land, we deserve more transparency about who's going to benefit most.

We also note that the ground lease revenue shown in the draft plan appears to be adjusted for inflation over the coming 99 years—but the plan doesn't clearly state that. The plan should clearly state that these cumulative numbers are adjusted for inflation, which will impact not only project revenue but also expenses. The cost of providing community services will likely continue to inflate at least as quickly as the ground lease revenue will.

Gentrification and displacement

Minneapolis is experiencing a massive housing crisis. Gentrification and displacement pressures are being felt citywide. Homes around UHT are already showing significant increases in valuation even before the UHT redevelopment has been approved.

The city has created several important policies and programs to slow displacement. At this time, they still don't appear to be sufficient address the forces of displacement that will be unleashed by this redevelopment. There is no proof yet that the city is capable of holding back the tide. Creating a development that seems destined to drive more gentrification and displacement in North Minneapolis—before our city has ended the current crisis—is enormously risky.

Failed process leaves incomplete plan

Unanswered questions, rushed timeline

In addition to the missing AUAR, other elements missing from the draft coordinated plan that concern us (discussed in detail later in this letter) include:

- Lack of detail about the community hub's services and costs
- No clear transit plan for the site, nor a transportation plan for CPAC events

- What will be included in the Community Benefits Agreements (CBAs)? What entity will hold those CBAs long-term, and will they be equipped to enforce them?

We're also aware that the city is commissioning studies about the development's potential impact on property taxes for nearby residents. This is important information for the community to have before any plan is approved.

With all of this information missing from the draft coordinated plan we ask, *why rush to approve this project?* Why should residents and city leaders be asked to support this project when there are so many unanswered questions about its public costs, feasibility, and community impacts?

Exclusionary planning process

The core of this development plan was never community-driven. The UHT concept plan was created by United Properties and First Avenue. In the community engagement period since, the community, including the Collaborative Planning Committee (CPC), has been specifically prohibited from amending the Exclusive Rights Agreement or presence and size of the CPAC. While we have observed the hard work of CPC members, they have never been given a real opportunity to question the basis of the development plan.

Two CPC members publicly resigned because they did not believe that the development nor the planning process were equitable. Several other CPC members also stopped participating and were not replaced.

Throughout the planning process, there has also been a clear lack of outreach to and inclusion of many Northside communities. The city's engagement plan for this current public comment period, as with past engagement periods, has glaring gaps. We are not aware of any attempts to engage non-English speakers, such as the 12 percent of North Minneapolis residents who speak English "less than very well" (source: Minnesota Compass). We are not aware of any culturally specific outreach to residents who identify as Indigenous, Hmong, Lao, Latinx, or East African, among others. MPRB has demonstrated better engagement in this realm, such as hiring cultural consultants to assist with outreach to specific communities.

The Community Learning Tables were not inclusive engagement opportunities, either. While they did allow community members to learn about and examine various aspects of the project in-depth, they were not designed to be accessible. Several in-person workshops were 4 hours long, an impossible time commitment for many. Well-established best practices for community engagement, such as providing compensation for attendees' expertise, transportation, and childcare were not provided. And again, we did not see many immigrant communities or non-English speakers represented in the process.

Indigenous erasure

We're also stunned that the draft coordinated development plan, despite being 97 pages long, includes no acknowledgement of the long history that Dakota and other Indigenous people have with this land. The fact that this important history was omitted from this lengthy document—even from its history section—makes us question whether this historic and ongoing injustice has been given adequate attention by the city and development team.

Our Indigenous neighbors were the first victims of involuntary displacement in Minneapolis. A clear discussion of the history of settler land theft and a detailed commitment to repairing this harm should be included in the plan and put into action. This history should also be acknowledged through site design and through engagement with Indigenous community members.

Insufficient community benefits

While the community is being promised significant control over the ongoing development of UHT, the fine print is clear: the development team retains ultimate power over the project. This disappointing reality is to be expected when the city led such a flawed process to reach this point: when you give developers control over prime public land, the developers will stay in the driver's seat until the end.

The draft coordinated plan makes many promises about community benefits without offering sufficient detail about what happens if these promises are not kept. Enforcement mechanisms are only vaguely defined. And final selection of the community entities involved in the project is given to the development team—not in the hands of the residents who own this public land and will be most impacted by the development. The power is in the hands of the development team.

We have several concerns about whether the project will deliver its promised community benefits. Many are discussed here; our specific concerns related to First Avenue's concert venue are described in the following section.

CBA creation and enforcement

Any community entity who holds a CBA with the development team will be responsible for enforcing the agreement, potentially through legal action. This requires both ability and will. Will the community entity have sufficient funding to retain legal services when needed? Will there be any hesitation to pursue enforcement if the entity is dependent on political relationships or on funding from the city or the development team (or associated funders such as the Pohlada Family Foundation)?

The coordinated plan also does not describe any continued community engagement during the CBA negotiation period. McKinley Community and the development team seem to have complete control here to select the community entity and negotiate CBAs without any guaranteed opportunity for other residents to engage in the process. Given how important these CBAs, and the entity that holds them, will be to ensuring that UHT serves Northsiders first and foremost, the lack of wider accountability here is concerning.

These important questions are not resolved in the draft coordinated plan. The community is being asked to approve a plan that doesn't have any mechanisms securely in place to ensure that promises are kept.

Real estate partner roles

The community entity who will partner with First Avenue to form a CPAC LLC doesn't have any guaranteed power. First Avenue will retain the majority of board control over the LLC.

The options for real estate partners in the rest of the development also provide the most power and project ownership to parties with the most money. If a community entity isn't able to bring any funding to the project, then it's limited to an advisory role. It's hardly revolutionary. This perpetuates the same dynamics that have oppressed Northsiders for generations: you need to have money to make money. Because North Minneapolis residents have been systemically denied wealth and capital, they will continue to be denied the biggest opportunities for wealth and capital at UHT.

Community hiring programs have mixed results

If living-wage job creation on the Northside were the city's primary goal for UHT, this entire project would have been approached differently. The centerpiece wouldn't have been a concert stadium that provides few full-time jobs (and whose jobs aren't even included in the count of living-wage jobs the draft coordinated plan promises).

Local hiring programs often fail to employ as many neighborhood residents as promised and shouldn't be considered an ironclad community benefit in this project. Simply designating land uses for "job centers" doesn't deliver jobs to residents. Much more is needed to bring those goals to fruition. Local hiring programs are most successful when government and community partners are closely involved, providing support to hiring partners and jobseekers as well as enforcing agreements when necessary. It's not clear what such supports and enforcement mechanisms are in place at UHT, particularly for the permanent jobs (versus construction jobs).

Coloplast, fewer than two miles away from UHT, promised to hire North Minneapolis residents in exchange for public funds. It's never come close to meeting its commitments. The public needs assurances that hiring at UHT will be different.

UHT's location also presents a challenge to job access. Again, the area lacks transit service. Even if transit service is added to UHT, it might not have a schedule that meets the needs of second- and third-shift workers in manufacturing and processing jobs. Could new jobs be located elsewhere on the Northside with better transit access? That might make employment efforts more successful. It could also lower costs because other sites may not be constrained by the same high design standards required of riverfront buildings.

Community hub concept is vague

The community hub is an intriguing idea but lacks detail. If this is to be one of the community benefits embedded in the project, then the community should receive more information about what the hub will provide to Northsiders. What kinds of services will be available? How will the hub be funded to ensure that leases for tenants are affordable as well as services for community members? Will public subsidies be needed for construction or programming, and if so, how much?

With this information missing from the draft coordinated plan, it's difficult to assess how feasible the hub is and to what extent it will benefit North Minneapolis residents. By this point in the development process, when the community is being asked to approve this plan, we deserve more information about the purported community benefits of the community hub.

Community Performing Arts Center monopolizes public funds with questionable return

From the beginning of this planning period, First Avenue's Community Performing Arts Center (CPAC) has been the centerpiece. Everything else at UHT will have to relate to and revolve around a 7,000-10,000-capacity outdoor concert stadium, and yet it's the element that the community hasn't been allowed to make changes to. Requiring the CPAC to remain as the centerpiece of the UHT project is like going to a restaurant and being told, "There's only one entrée on the menu, but you can choose your dessert."

Despite the enormous public cost of the CPAC and its impact on every other element of the development, it's never been critically examined. The CPC has spent relatively little time discussing it and was explicitly prohibited from recommending changes to venue capacity without city council approval.

And despite receiving \$12.5 million in taxpayer funds, First Avenue has not provided any information about how risky this project may be or about what their profit will be relative to

the community benefits provided. No business would enter into this kind of agreement without confidence in the profitability of the enterprise. Why haven't the developers shared their expected return?

We have several objections to the CPAC. The MPRB UHT Park Community Advisory Committee has also documented several concerns and unanswered questions related to the interactions between the CPAC and the neighboring public park. We share these concerns (discussed in more detail in the "parks and public realm" section below).

Massive public subsidy for modest public benefit

When the city placed First Avenue's concert venue as its top state bonding priority, it helped ensure that the CPAC will consume an enormous level of public funding--\$12.5 million in state bonds. Since this is already the second round of bond funds awarded to UHT, we worry that there won't be appetite for further public investment in other elements of the project that are less risky and offer a better community return.

And First Avenue has received far more than a \$12.5 million benefit from the state. Bond funding means that we, the taxpayers, pay the interest on First Avenue's loans. If First Avenue were to borrow this amount of money from private lenders instead, they would be paying millions of dollars in interest. A 6% interest rate would make the total cost of a 20-year, \$12.5 million loan over \$21 million. That's the real level of benefit First Avenue is receiving from state taxpayers for this project.

In return, First Avenue will add a \$3 ticket surcharge to create a community fund for North Minneapolis. First Avenue has said that this fund will total \$500,000-1 million per year. They have declined to guarantee a minimum level of funding or index this ticket fee to inflation, making it difficult for the community to plan ahead and count on continuing funds.

Even \$1 million a year will simply not go that far. By comparison, Northside Funders Group members invest over \$15 million a year in North Minneapolis. The Northside Achievement Zone's annual budget is over \$10 million. Appetite for Change's annual budget is \$2.5 million. It's easy to envision a future in which UHT development drives so much gentrification and displacement in North Minneapolis that First Avenue's modest contributions don't even cover the cost of mitigating the problems they helped create.

The public funding awarded to First Avenue's concert venue, in comparison to the promised community benefits, just doesn't balance. If Northside-based businesses, who are often denied access to capital, were given this private-market equivalent of \$21 million in free money, imagine the growth they could achieve and the neighborhood jobs they could create.

Jobs and wages

First Avenue has steadily refused to answer basic questions about the jobs this venue will provide: How many will be full-time? Given the venue's limited use in the winter months, will most jobs be seasonal? What are the average wages, hours, and benefits for CPAC employees?

In a 2019 presentation to the CPAC, First Avenue stated that only about ten percent of its current jobs are full-time and salaried. If the same ratio holds true for the promised CPAC jobs, that means that a \$12.5/\$21 million public investment will yield approximately 20 permanent, full-time, salaried jobs.

City staff have confirmed that the 300 living-wage jobs promised in the coordinated plan will come from the yet-undefined manufacturing and processing uses at UHT. First Avenue's jobs are *specifically excluded* from that figure. If it's so widely known that First Avenue will not bring enough living-wage jobs to the Northside to even be worth mentioning in the plan, why is this the center of the project?

Unresolved transportation issues bring environmental risk

The lack of a transportation plan for CPAC events is also concerning. First Avenue hasn't presented any clear plan for bringing 7,000-10,000 attendees to events at a site that has no transit. There are two unappealing options: creating parking or providing shuttles from parking elsewhere. Both options present challenges.

Creating on-site parking for 7,000-10,000 concert attendees is a poor use of riverfront land. In 2019, the Federal Reserve Bank proposed a new 800-stall parking ramp near the downtown Minneapolis riverfront. Several community organizations, including FMR, opposed the project because it conflicted with the city's sustainability goals, and the city's Planning Commission rejected the project. What makes UHT different from this? Why should North Minneapolis be saddled with parking lots and ramps on its riverfront (especially those that only serve intermittent events), rather than more sustainable and forward-thinking land uses?

The alternative event transportation option, providing shuttles, presents its own concerns. Namely, we're concerned about shuttle buses idling on the parkway and near the park, since that is where CPAC attendees would exit. Idling buses will disrupt the bike/pedestrian and park visitor experience with noise and emissions. Again, is this an appropriate plan in a community experiencing poor air quality and high rates of asthma? Why isn't the city seeking a higher standard for UHT?

Noise challenges limit diversity of programming

First Avenue's 2017 acoustic feasibility study for a venue at UHT includes some concerning elements. The report states that the background noise levels on the site, particularly from I-94, "make this site less than desirable for performances other than rock concerts."

If further research has alleviated this concern, then First Avenue should provide that information. Otherwise, the development team's own study suggests that the venue will not be suitable for a full, diverse range of community programming that would likely include many kinds of art performances other than rock concerts. This casts the promise of "free community arts programming" (which per city staff is actually at-cost programming, not free) into further doubt and raises even more questions about whether the public benefits of the CPAC can exceed the significant public cost.

Site design considerations and concerns

Environmental justice in building design

We oppose the draft coordinated plan's recommendation to seek Conditional Use Permits to build riverfront buildings that exceed the height limits in the city's Shoreland Overlay and Mississippi River Corridor Critical Area (MRCCA) districts. These height limits are intended to promote strong urban form, improve river views (including for sites further back from the river that may be redeveloped in the future), and create a more welcoming sense of scale and relationship to the river. The MRCCA ordinance was developed through years of extensive stakeholder participation and should not be disregarded at the first opportunity.

The newly-adopted MRCCA ordinance and zoning maps already allow taller building heights at UHT than along most of the city's neighborhood riverfront areas. This essentially gave UHT a free pass to meet a lower standard of riverfront design than is expected in the rest of the city, yet the development team is still pushing for even more height.

Why is a city-owned site in North Minneapolis, that's intended to reconnect the community to its world-class river, being held to a lower design standard than the rest of the city?

Building environmental standards

We support the project's commitment to build all structures to LEED standards. To provide even stronger environmental benefits in the Northside Green Zone, an area burdened by environmental injustice, we also encourage compliance with the state B3 building guidelines. These guidelines include standards for bird-safe building design, for which FMR advocates in all new development in the Mississippi River flyway.

The city of Minneapolis is examining options for adding more bird-safe requirements into its MRCCA ordinance later this year. If any UHT building applications are submitted before these requirements are formally in place, we request voluntary compliance with the city standards.

Transportation

We're concerned about the lack of transit service, or a concrete plan to bring transit service, at UHT. As discussed above, this is especially concerning for CPAC events. While the expansion of bike and pedestrian access is welcome, transit is a necessary component of a livable urban neighborhood. An auto-centric neighborhood will bring more vehicle emissions to a community already saddled with poor air quality due to its proximity to I-94 and industrial polluters. This environmental injustice shouldn't be further perpetuated at UHT.

Park and public realm

We support the inclusion of public parkland in the development. A large public park helps fulfill the longstanding goal to reverse park and river access disparities in North Minneapolis. The park at UHT will partially close the gap in riverfront bike/pedestrian trails and will offer new opportunities for residents to connect with the Mississippi River. If designed and programmed well, park space can also help secure UHT as a welcoming place for all North Minneapolis residents.

As the future of UHT continues to evolve, it is critical that the public realm be protected. The park spaces at UHT should not be shrunk, moved, or redesigned without an MPRB-led community engagement process.

It's also crucial that current Northside residents are connected to UHT from the beginning of the development. To this end, we urge the creation of the entire length of the riverfront bike/pedestrian trail in Phase 1 of the development and a commitment to keeping the trail open during all future site construction. This trail is an important public asset that should not be hindered by private development.

The private development surrounding the park will also significantly determine who benefits most from the UHT public realm. We're particularly concerned about the impacts of a large private concert venue on the adjacent public park; we worry that the venue will overwhelm the park and make it an unwelcoming or even inaccessible destination for North Minneapolis residents.

CPAC impacts on park

The MPRB UHT Community Advisory Committee (CAC) has clearly stated that it does not believe that the CPAC is a compatible neighbor to the public park at UHT. The CAC has

documented several concerns and recommendations about the impact that CPAC and other surrounding development might have on the park. These include questions about noise, traffic, park access, and idling vehicles during CPAC events; building design and amenities that support park uses; and the crucial need for multimodal transportation connections to Northside neighborhoods.

We share the CAC's documented concerns and expect to see them adequately addressed in the final coordinated plan and during all phases of development. Private development and private entertainment events should not be allowed to have large-scale, frequent negative impacts on public park space. How enjoyable or accessible is a public park if it's overwhelmed by noise, crowds, and traffic from the neighboring concert venue on 30-50 of best evenings of the summer? Is it equitable to have exclusive paid events cause that much harm to free public spaces?

Industrialized riverfront: manufacturing and processing

Contrary to United Properties' early visions for UHT (which included mini-storage and industrial uses), the Mississippi riverfront is unique and should be treated as such. We are disappointed that the best the development team can come up with for a prime riverfront parcel is a manufacturing facility.

Across the city and country, we are trending away from industrialized riverfronts and reclaiming that land for housing, recreation, and natural areas. The UHT development plan only partially follows this national movement. We do not believe that manufacturing and processing are appropriate uses at UHT nor will they contribute to a vibrant, accessible, walkable riverfront.

North Minneapolis residents have borne the harm done by generations of industrialized Northside riverfront. These industrial uses have cut off residents from access to the river and recreational space. They have polluted North Minneapolis and contributed to the neighborhood's poor health outcomes. The future must be different. New development must repair, not repeat, the harm of the Northside's industrialized riverfront.

If industrial uses are allowed at UHT, the coordinated plan should include detailed design standards so that residents and interested tenants are all on the same page from the beginning about what is expected on this prime parcel of land. Poor design will repeat past faults and lock the Northside into a continued industrialized riverfront for many more decades.

Structures will need to include windows, active entrances, and connections to the public realm. They will need to be small enough that pedestrian access around the site is still reasonable; excessively large buildings will create a wall between the neighborhood and the

river. These buildings will also need to avoid noise and odor, big blank walls without entrances or windows, and excessive freight traffic that could impact bike/pedestrian safety and enjoyment along the river parkway.

Housing

We support the inclusion of significant affordable housing at UHT and emphasize the need to include deeply affordable housing (at or below 30% AMI) in the project. North Minneapolis' median income is less than half of the regional Area Median Income (AMI). It's important that this disparity is taken into account to help ensure that current North Minneapolis residents are able to access the housing at UHT. Funding for deeply affordable housing could have been a better use for the state's \$12.5 million in state bonds and would deliver much stronger, more proven benefits to residents.

Given that this public site should continue benefitting Northsiders long-term, we encourage the city to have a plan in place to guarantee housing affordability when the initial 20- or 30-year affordability requirements expire.

As discussed above, FMR opposes the draft coordinated plan's recommendation to seek Conditional Use Permits to build riverfront buildings that exceed the height limits for some of these housing developments.

Closing comments

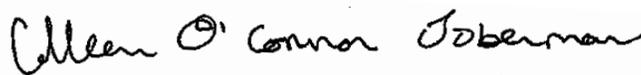
We reiterate our primary concern: the UHT development as currently imagined will primarily benefit wealthy developers while failing to provide meaningful benefits to North Minneapolis residents. And the draft coordinated plan has too many missing elements and unanswered questions to be considered anywhere near ready for a vote.

We urge that the UHT coordinated development plan be discarded and a new development process, led by the community from the beginning, be started as soon as possible. Thank you for your consideration of these comments.

Sincerely,



Whitney L. Clark
Executive Director



Colleen O'Connor Toberman
River Corridor Program Director