

From: TOM DIMOND <tdimond@q.com>
Sent on: Monday, January 23, 2023 8:09:10 PM
To: Torstenson, Allan (CI-StPaul) <allan.torstenson@ci.stpaul.mn.us>;
josh.williams@ci.stpaul.mn.us; Prince, Jane (CI-
StPaul) <Jane.Prince@ci.stpaul.mn.us>; Harr, Stephanie (CI-
StPaul) <Stephanie.Harr@ci.stpaul.mn.us>
Subject: Saint Paul Mississippi River Corridor Recommendations

Think Before You Click: This email originated **outside** our organization.

Tom Dimond

2119 Skyway Drive

Saint Paul, MN 55119

Saint Paul Mississippi River Corridor Area (MRCCA) Ordinance Recommendations

MRCCA core values call on us to protect and enhance our natural resources in the river corridor. Based on State law, the protection and enhancement of views, wildlife habitat, recreational opportunities, bluffs, wetlands, flood plains, environmentally sensitive areas and history is of utmost importance. Development must protect views of the river valley from and to the bluffs for the value and benefit of the surrounding community. The draft MRCCA ordinance does not adequately protect bluffs and blufftop views in downtown St. Paul. **At a minimum, the ordinance should not reduce existing protection of river bluffs and blufftop views.**

The draft ordinance includes MRCCA regulations that have protected bluffs from development since the 1970s. One notable exception is Sec. 68.293 proposal to exempt buildings and structures on the face or abutting the bluff in the UC district of St. Paul, between Chestnut Street and Highway 52, from regulation. This is the only such exemption in the entire 72 miles of the Mississippi River covered by MRCCA regulations. **The new exemption for buildings and structures on the face or**

abutting the bluff in the UC district of St. Paul from bluff protection regulations should be deleted from Sec. 68.293 of the draft ordinance.

Early in the development of Twin Cities, visionary leaders had the foresight to preserve land along the river, lakes and bluffs for a system of parks and parkways. They appreciated the magnificent public bluff views this provides and understood the tremendous long-term value this has for residents of the entire city and the protection of wildlife. In ensuing decades, city leaders added to and built on this legacy, creating one of America's finest metropolitan park systems. While there has often been heated opposition to preservation of these areas and public views, from narrow and short-sighted development interests, wisdom has generally prevailed.

By the early twentieth century the city began to fill in incomplete sections of the parkway system along the top of river bluffs and reclaim fine views of the river valley where they had already been lost to private development. One example is the development of Kellogg Peace Park. Saint Paul recognized the importance of opening up the riverfront for the benefit of all. The Capitol mall had been created for the Capitol and the City Hall development included a prominent unobstructed view of the park and river. The City Council voted to remove buildings between Third Street (now Kellogg Boulevard) and the railroad to open river corridor views up and down the public river.

A century ago the city undertook a huge transformative project to better connect downtown St. Paul and the Mississippi River, reflecting longtime goals to take advantage of wonderful views of the river valley from the downtown bluff, views few downtowns can match. The project included turning Third Street into Kellogg Boulevard, a designated parkway with public river corridor views along the top of the downtown bluff, and Kellogg Mall Park, a

city park that stretches more than three blocks along the edge of a sharp bluff overlooking the Mississippi River and Valley in the center of the downtown riverfront. This great achievement of past downtown and city leaders should be respected, augmented and expanded. Trashing existing protection of river corridor views from Kellogg Boulevard and Kellogg Mall Park as proposed by some at Ramsey County and the Downtown Alliance would be unconscionable. **Maintaining existing protection of river corridor views from Kellogg Boulevard and Kellogg**

Mall Park as proposed in Sec. 69.234((f) of the draft ordinance is completely appropriate.

Plans for the downtown core adopted by the City Council and HRA in the early 1960s proposed extending Kellogg Mall Park eastward to the post office to more fully open up the ‘front porch’ of the central business district and envisioned that no buildings would block the view of the river from the park. When they became aware that the railroads were interested in selling property (now owned by Ramsey County) between the park and the river to a developer proposing four high-rise buildings that would have blocked views of the river, the HRA and Planning Board recommended imposing height restrictions to protect the views. The City Council adopted the existing height districts in Sec. 63.103 of the zoning code in 1966 to protect the economic and aesthetic amenities of the city and river corridor views from Kellogg Boulevard and Kellogg Park. The railroads sued, asking that the height districts be declared void and unconstitutional. The city argued that property values on the north side of Kellogg Boulevard would be diminished by the high-rise buildings proposed for the railroad property. In 1969 the U.S. Court of Appeals upheld the existing height districts. Adoption of the new Critical Area overlay districts and regulations in compliance with the new state MRCCA rules should not be used as an excuse to delete the existing height districts in Sec. 63.103 of the zoning code. **The existing height districts in Sec. 63.103 of the zoning code should be maintained; they should not be deleted.**

Kellogg Mall Park is the centerpiece of the proposed River Balcony along the downtown bluff, providing spectacular views of the river and valley. Completed over 90 years ago, Kellogg Mall Park is the real first section of the River Balcony. Continuing to protect views of the river and valley from Kellogg Boulevard and Kellogg Mall Park certainly is *not* “outdated” as suggested in a letter from a Ramsey County Commissioner. This would benefit a private development at the public’s expense, of loss and harm to public views of the river and valley from Kellogg Boulevard and Kellogg Mall Park. (St. Peter Street to East of Robert Street)

West of St. Peter Street, including a maximum height allowed through a CUP would provide better protection of scenic resources and clarify the maximum height that would comply with the requirement in the MRCCA rules for tiering of structure heights away from the Mississippi River and blufflines, with lower structure heights

closer to the river and blufflines. Requiring a CUP for any building above the height of Kellogg Boulevard would help ensure protection of the most important river corridor views, including those at St. Peter Street, Market Street, and Washington Street/Science Museum overlook specifically identified in the Comprehensive Plan. It would help protect river corridor views from the River Center that the River Center Ramp was designed to provide. A maximum height at the west end of the UC Urban Core district could also help protect the view of the state capitol from Smith Avenue that is part of Cass Gilbert's plan for the capitol approach. **The draft ordinance should be amended to provide appropriate maximum building heights allowed through a CUP in the UC Urban Core district, and to require a CUP for any building between Chestnut and Jackson above the height of Kellogg Boulevard.**

Ramsey County staff Josh Olson's commented at the Planning Commission public hearing that the design of the RiversEdge project still needs a lot of work. The public was told that the proposed heights were concepts for planning purposes dependent on the market. We were told there is no firm commitment to actually build the heights shown. Besides not knowing the actual scale of the proposal the public is being asked to subsidize the project. Reports have cited tens of millions in public subsidies sought from Ramsey County and State taxpayers. Funds that could go to Regional Parks instead of Downtown Development.

There ought to be exceptional buildings that reflect the best image of St. Paul and sensitively fit the context of this riverfront site. The current RiversEdge concept shown on the front page of the Pioneer Press on Saturday is of huge steel and glass buildings that tower over everything nearby and obliterate the rest of downtown from view. It might be appropriate somewhere in Miami or Houston, but it would stick out like a sore thumb on this St. Paul riverfront site. It ignores the existing height limit for the portion of the site east of St. Peter Street and the requirement in the MRCCA Rules for tiering of structure heights down closer to the river. It is inconsistent with the River Balcony Master Plan that shows how to develop this site in compliance with the existing height district and the MRCCA tiering requirement. It also ignores the MRCCA requirement to minimize interference with public river corridor views and views specifically identified in the Comprehensive Plan. The current conceptual design of the RiversEdge project exemplifies the importance of including maximum building heights and a CUP requirement in the MRCCA overlay zoning ordinance to help ensure compliance with the Comprehensive Plan and MRCCA rules. Why give away the store to a proposal that is lacking in detailed commitments and wants your tax dollars.

At a minimum parkland and open views should be retained between Wabasha and Saint Peter Streets. City plans call for the Kellogg Peace Park to extend to 7 corners. The Park is our City Hall Courthouse grounds. Jail construction was only allowed below the grade of Kellogg and a park plaza was required at street level to provide for the public. **The existing requirements for park at grade and development below Kellogg must be maintained. Both the City and County have parkland replacement requirements. The existing River Corridor views have been enjoyed by most for their whole life and must be maintained.**

Protecting the history of the river corridor is a primary role. The protection of historical views from the park and City Hall are essential. Kellogg was the U. S Secretary of State. After the carnage of World War I, Kellogg brought many world leaders to his Saint Paul home in Crocus Hill and they would drive through town and out Military Road to his Estate in Cottage Grove where he discussed efforts to retain the peace. His efforts helped eventually lead to World organizations like the United Nations. His work was part of Minnesota's influence on Peace efforts that honored those gave their all and advocated for future peace. The history of Kellogg Peace Park is tied to the Hall of Honor for lost loved ones, and the Peace Statue in City Hall. Plans also called for a peace park connection between the Capitol grounds and the Saint Paul Riverfront. A Peace Statute and reflecting pond were placed at the south end of the Capitol grounds. Kellogg Peace Park was constructed along the river but the green connecting link remains to be accomplished. This is an important historical link to the WWI loss of soldiers, World Peace efforts, and the construction of our City Hall and Court. These prized public spaces and public views should not be lost. Taxpayer subsidies should not be used to steal our historic places.

The existing definition of Development for the River Corridor should be retained. The existing definition provides a more inclusive review of development. The DNR supports retention of existing language that does a better job of protecting and enhancing the river corridor. **The draft ordinance should be amended to retain. "Development (river corridor district only). The making of any material change in the use or appearance of any structure or the land; a change in the intensity of use of land; alteration of a shore or bank of a river, stream, lake or pond; a commencement of drilling (except to obtain soil samples); mining or excavation; demolition of a structure; clearing of land as an**

adjunct to construction; deposit of refuse, solid or liquid waste, or fill on a parcel of land; or the dividing land into two (2) or more parcels.”

The draft ordinance should be amended to contain parkland zoning within the River Corridor.

City policy calls for parkland zoning throughout the City. This is an important policy that has been stalled for far too long. Establishing parkland zoning within the River Corridor would be a welcome step toward the City-wide goal.

The draft ordinance should be amended to prohibit discharge of pollution. The ordinance should include language that prohibits the discharge of pollutant/pollution into the waters or lands of the River Corridor, including but not limited to PFAS, TEC, and 1-4 Dioxane.



Capitol Region Watershed District

595 Aldine Street • Saint Paul, MN 55104

T: 651-644-8888 • F: 651-644-8894 • capitolregionwd.org

January 19, 2023

Saint Paul Planning Commission
c/o Allan Torstenson, Principal City Planner
1400 City Hall Annex
25 West Fourth Street
Saint Paul, MN 55102

RE: CRWD Review of Mississippi River Corridor Critical Area (MRCCA) and Floodplain Management Regulations

Dear Mr. Torstenson,

Capitol Region Watershed District (CRWD) greatly appreciates the opportunity to comment on the MRCCA and Floodplain Management zoning code amendments. CRWD reviewed the proposed amendments with an eye toward maximizing protection of natural resources and consistency with our rules and the City of Saint Paul stormwater ordinance. CRWD finds these amendments to generally be protective of water quality and largely consistent with the MN Department of Natural Resources model ordinance. Please consider the following comments and requests for clarification as we work to protect our shared natural resources.

General Comments

1. We recommend including a reference to assist applicants in locating the primary conservation area map or inclusion of this map.
2. Please consider referencing the relevant Watershed District rules throughout the regulations.

Specific Comments

3. 60.220.S. – Shoreland was removed from definitions, however it is still used in the definition of “Overlay district” (68.214). Consider removing “shoreland” from the definition.
4. 68.228(b) – Consider adding additional days of notification to partner agencies, up to 30 days prior, to allow for constructive comments.
5. 68.234(f) references Saint Paul datum, which is different from the other height sections and may lead to confusion. Consider including information regarding the location of the datum and its relationship to mean sea level within 68.200 or a reference to the appropriate section of the St. Paul Code.
6. 68.234 – Consider creating a summary table for the height requirements for ease of reference.
7. 68.236(b) – Consider including reference to the underlying zoning setback for UC district.

8. 68.236(d) – Consider allowing structure setback averaging only under conditional use permit. This section may allow new structures closer to bluffs than is prudent and safe. This section may allow work in areas that are conservation priorities.
9. 68.248 – CRWD supports the inclusion of bird-safe glass and construction scheduling related to spawning, nesting, and bird migration to ordinance.
10. 68.255(d) – Error in reference, should refer to section 68.238(e) not 62.238(f).
11. 68.256 – Public transportation facilities should also be designed to minimize erosion and the flow of untreated stormwater into the river (similar to the districts referenced in 62.232).
12. 68.257(c) - Trails, access paths, and viewing areas should only be placed within bluff impact zones if no other alternative exists. Natural surface trails can be the source of substantial erosion.
13. 68.264(b) - Recommend adding language that vegetation removal should be scheduled to avoid periods of bird migration.
14. 68.266(b)(6) – “professional ecologist, arborists, ...” implies there is a MN recognized certification, similar to a professional engineer. Confirm this is the intent. If not, recommend replacing “professional” with “experienced” or similar
15. 68.266(b) – Recommend adding a subsection indicating that all areas must have vegetative or other impervious cover (ie. no bare soils following vegetation removal).
16. 68.266(c) – Consider specifying who/what department issues the certificate of compliance (DSI, forestry, PW, etc.).
17. 68.277 – Recommend specifically indicating compliance with 68.100 and watershed district rules and other local rules (ie. no increase in flood depth, compensatory storage required for fill).
18. 68.274(a)(3) – Recommend adding “or downslope” to the list of properties that cannot be affected.
19. 68.274(b) – Recommend requiring that the trails and sidewalks are confirmed to drain to the down gradient vegetation or filter strip. It can be the case that long stretches of trail or sidewalk drain to a single low point without sufficient filtering capacity.
20. 68.274(b) – CRWD recommends using language consistent with Chapter 52, the phrase “storm water permits” is not referenced in the City Code. Consider substituting the phrase, “Any project that creates new impervious surface or fully reconstructs existing impervious surface of more than 10,000 square feet must treat the water quality volume as defined in 52.04(d).”
21. 68.274 – The river neighborhood, river towns/crossing, separated from river, urban mixed, and urban core districts prioritize minimizing the flow of untreated stormwater into the river (68.232). It is appropriate to have more restrictive requirements for stormwater treatment (currently development of 1 acre or more unless adjacent to a waterbody). For these districts, CRWD recommends requiring stormwater treatment for all land alteration projects greater than or equal to 10,000 sf of disturbance, consistent with Chapter 52 of the City Code.
22. 68.282 – Due to space constraints within Saint Paul, the requirements of this division are unlikely to be triggered if a ten-acre threshold is used. Consider using a lower threshold, such as 3 to 5 acres and using the optional word “contiguous”. Using the 5-acre size would be consistent with the minimum size of planned developments in Saint Paul per 66.812.

23. 68.286 – It isn't clear why 66.543 is referenced, is the intent to reference 66.544? The referenced City Codes do not include provisions for protection or restoration of continuous vegetation or other items identified as priorities by the MRCCA plan. Recommend including requirements for alternative design to protect and/or restore continuous vegetation, increase native or natural terrestrial and aquatic habitat, and prioritize the preservation of open space.
24. 68.293(a) – Error in reference, wireless communication towers should refer to section 68.238(e) not 62.238(f).
25. 68.293(d) – Error in reference, shoreline facilities should refer to section 68.238(d) not 62.238(e).
26. 68.293(e) – Consider removing the exemption for private roads in the BIZ due to safety and erosion concerns. If the exemption remains, CRWD suggests adding language requiring additional erosion prevention and stormwater treatment on/around the road.

Clarification Requests

27. Figure 68.214(b) shows the bluff extending to the edge of the bluff impact zone, consistent with the figure in the model ordinance. Should the bluff area only be the escarpment that is greater than 75 degrees?
28. Does the City of Saint Paul have a document identifying preferred restoration areas? If so, consider including a reference.

Thank you for the opportunity to review these zoning code amendments, CRWD values our partnership with the City of Saint Paul to protect the Mississippi River. We look forward to continuing working cooperatively with the City towards further water quality improvement. Please contact us for any needed clarifications of our comments.

Sincerely,



Luke Martinkosky
Water Resources Regulatory Specialist
Capitol Region Watershed District

cc: Andrew Hogg, City of Saint Paul
Luis Pereira, City of Saint Paul
Paige Ahlborg, Ramsey-Washington Metro Watershed District
Mark Doneux, Capitol Region Watershed District
Forrest Kelley, Capitol Region Watershed District



October 26, 2022

Luis Pereira, Planning Director
Department of Planning and Economic Development
City Hall Annex
25 West 4th Street
Suite 1300
Saint Paul, MN 55102

Dear Luis Pereira,

I am writing to request changes to the Urban Core (UC) portion of the River Corridor and Floodplain Overlay Zoning Amendments OR a delay until the Saint Paul Downtown Alliance has completed the development of the Downtown Investment Strategy plan.

The Saint Paul Downtown Alliance is developing the Downtown Investment Strategy plan in order to accelerate the growth and development of the largest jobs center, most significant visitor destination, and fastest growing residential area in the East Metro. Based on recent studies by the International Downtown Association, SPDA has adopted goals to increase the level of density in downtown by adding 20,000 residents, 20,000 jobs, and 20% growth in the number of visitors. This level of density will result in a more vibrancy, more economic vitality, improved public safety outcomes and perceptions, and is critical for the continued cultural and financial health for the city, county, and East Metro region.

Downtown Saint Paul is the site of many exciting and transformational development projects led by a variety of public and private partners. These include the RiversEdge proposal led by Ramsey County, the redevelopment of the RiverCentre Parking ramp led by the City of Saint Paul, the development of the Central Station site led by the Metropolitan Council, the repurposing of the St. Joseph's campus led by M Health Fairview in partnership with the Saint Paul Port Authority, and the development or improvement of other public and privately owned parcels in downtown Saint Paul.

The Downtown Alliance has convened a steering committee that includes leaders from the City (Mayor and Ward 2 Councilmember), County (Board Chair), Met Council (Chair), Port Authority, CapitolRiver Council, Saint Paul Area Chamber, and more. It is in the process of selecting a consultant team to advise and assist in determining and sequencing the priorities and strategies for executing on these exciting projects the next 3 – 5 years. The consultant team should be in place by the end of the year, and the process is expected to last several months with a plan to be established within the next year.

Given the important impact of these zoning changes and their potential impact on the density goals for downtown, we ask that the UC portions be left unchanged until we can understand their relationship to the wider plans and strategies for downtown Saint Paul. If that is not possible, we ask that the adoption of the entire overlay be delayed until it can be coordinated with the development of the Downtown Investment Strategy.

Thank you for your consideration,

A handwritten signature in blue ink that reads "Joe Spencer".

Joe Spencer
President
Saint Paul Downtown Alliance

Finlay, Karoline (CI-StPaul)

From: ED MORGAN <emorgan_mn@yahoo.com>
Sent: Tuesday, January 17, 2023 9:03 AM
To: Finlay, Karoline (CI-StPaul)
Subject: Re Mississippi River corridor

Think Before You Click: This email originated **outside** our organization.

Ms Finlay,

I am a life long St Paul resident. I am in favor of reflective glass on new and rehab construction. Furthermore, I feel that the river is developed enough no additional construction is warranted.

Thank you,

Ed Morgan
708 Geranium Ave East
St. Paul, MN

651-253-0944

Sent from Yahoo Mail on Android



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

101 East Fifth Street
Suite 2000
Saint Paul, MN 55101

651-222-2193
www.fmr.org
info@fmr.org

January 3, 2023

Dear Members of the Planning Commission:

Thank you for the opportunity to comment on St. Paul's proposed Mississippi River Corridor Critical Area (MRCCA) ordinance.

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 over 6,000 who participate as FMR advocates, volunteers, and members each year.

The Mississippi River is a natural, cultural, and historic wonder that helps define our metro area. In recognition of this, its 72-mile stretch through the Twin Cities is not only a state-designated Critical Area but also a national park afforded special protective policies.

The MRCCA ordinance adoption process is an important opportunity for communities to define their goals and expectations for years to come. A successful ordinance will guide riverfront use in a way that reflects the city's environmental, development, and recreational priorities while providing clarity for residents and developers.

FMR commends city staff for their thoughtful work on this ordinance. It's the clearest and most river-friendly ordinance we've seen among the 25 cities and township within MRCCA. St. Paul should be proud to demonstrate its connection to the Mississippi River in this way.

Strong ordinance elements

The state's MRCCA rules were created because the Mississippi River is a special asset that everyone deserves to enjoy, and in fact is the very reason why people have lived in the St. Paul area for thousands of years. In St. Paul, there are sections of the riverfront that are beautifully scenic and lined with public parks and trails. There are also places (such as Bdote Mnisota, the confluence of the Minnesota and Mississippi rivers) considered sacred by the Dakota people.

And in some places, it's possible to have a feeling of being immersed in nature despite being right in the middle of the city. That experience needs to be preserved so everyone can enjoy it

without having to drive to far-off parks. Access to nature is a crucial asset for a city seeking to become denser and less auto-dependent.

We appreciate that the state rules, and the city's ordinance, set thoughtful dimensional development standards to protect these scenic areas for all residents to enjoy. The city's clear height and setback limits, variance and Conditional Use Permit (CUP) criteria, and approach to building tiering in taller districts create more consistency and predictability for developers and residents.

Bird-safe building standards

We also applaud St. Paul's commitment to making new development within MRCCA bird-safe. FMR believes that dense urban development is crucial to addressing climate change and protecting the environment. However, dense development should still include science-based provisions that reduce harm to wildlife and promote safe passage for species with whom we share this land.

The Mississippi River is a crucial migratory flyway for about 40% of all North American migrating birds. Roughly 270 bird species live in or travel through the Twin Cities river flyway. Bird populations are experiencing significant collapse and are under continued threat. In the U.S. it's estimated that 600 million birds are killed in window strikes each year.

One way to balance density with wildlife protection is to require bird-friendly lighting design, building design, and building materials in all new development along the river. We're happy to see St. Paul do this with standards based on the best research, ordinances in several other North American cities, and the state of Minnesota's B3 building guidelines.

Urban Core (downtown) district

We understand that there are some questions about Urban Core district building height limits along the bluff. The city's long-held goal of connecting downtown St. Paul and Kellogg Boulevard to the river is a laudable example of thoughtful urban design. All residents and visitors should be able to enjoy views of and a sense of connection to the great Mississippi River as it flows through the heart of the city.

It's reasonable for the city to consider whether the height limits in place for approximately 100 years are still the best way to achieve this vision, or whether this updated ordinance should have more flexible height limits accompanied by clear criteria for ensuring that development still provides public views of the river.

We believe that the proposed ordinance as written properly addresses this issue through the CUP process. The CUP process shouldn't stop good projects from being built; it simply gives the city an opportunity to weigh the public benefits of individual projects once they reach a certain size.

For instance, the proposed Riversedge development might be a strong candidate for a CUP because of its public realm and River Balcony connections. If designed well, the development could enhance public views of and access to the river even if it's taller than what is permitted by right. This is an example of the CUP process working precisely as it should to respond to unique circumstances with an evaluation of community benefits and impacts.

We're concerned that some parties might advocate to weaken the (excellent) MRCCA CUP standards rather than attempt to comply with them, which would erode protections in many other parts of the city beyond downtown. The city should not throw out the baby with the bathwater here by watering down the ordinance to accommodate one or two potential projects. If these projects truly enhance the public experience of the river as promised, they should be able to meet the criteria for a CUP.

If the city still wishes to give more flexibility for development in the Urban Core district, it could eliminate maximum height limits allowed by CUP in the Urban Core district, allowing developers unlimited height as long as the project isn't detrimental to public views of and connections to the river. (As proposed, maximum heights with a CUP in the Urban Core district only apply from Minnesota Street to St. Peter Street as described in 68.234(f)(1-3).)

The city should not make any further ordinance revisions that open the door to weaker MRCCA protections elsewhere in the city where the nature-dominated views of the river are a rare public asset. Maintaining the CUP standards as proposed, and maintaining maximum height limits in these areas, is important.

We applaud city leaders and staff for this excellent MRCCA ordinance and urge its approval as written. Please don't hesitate to contact me at ctoberman@fmr.org or 651-222-2193 x29 to discuss any of our comments further. FMR also has extensive MRCCA ordinance resources (including videos, handouts, and interactive maps) available at www.fmr.org/river-rules.

Thank you for your time and consideration.

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
Land Use & Planning Director

Finlay, Karoline (CI-StPaul)

From: Kelly Harmon Schmitt <harmonschmitt@gmail.com>
Sent: Thursday, January 19, 2023 10:20 AM
To: Finlay, Karoline (CI-StPaul)
Subject: Re: Feedback on MRCCA proposed changes

Think Before You Click: This email originated outside our organization.

Hi Karoline!

Sure: 2203 Sargent Ave. Saint Paul, 55105

Thanks!

On Jan 19, 2023, at 9:52 AM, Finlay, Karoline (CI-StPaul) <karoline.finlay@ci.stpaul.mn.us> wrote:

Ms. Schmitt:

Thank you for your comment regarding the upcoming public hearing on the MRCCA zoning amendments. Community input is an important part of the process. In order for your written testimony to be included in the public record we will need your address. Please respond to this email if you would like your testimony included in the public record.

Thank you,

Karoline.

Karoline Finlay
Planning Secretary
Planning and Economic Development
25 4th St. W., 1400 City Hall Annex
Saint Paul, MN 55102
651-266-6641
karoline.finlay@ci.stpaul.mn.us
www.stpaul.gov
<image001.png>

From: Kelly Harmon Schmitt <harmonschmitt@gmail.com>
Sent: Wednesday, January 18, 2023 9:01 PM
To: Torstenson, Allan (CI-StPaul) <allan.torstenson@ci.stpaul.mn.us>
Subject: Feedback on MRCCA proposed changes

Think Before You Click: This email originated outside our organization.

Hello Allan!

I have some concerns on the MRCCA proposed changes that I am hoping you will listen to please...

1. The changes to the MRCCA rules have **never been presented or discussed by the district councils**. This is a major neglect of citizen engagement.
2. Some of the changes in the MRCCA rules **appear to reduce environmental protections and loosen restrictions** allowing for greater development within the MRCCA. This is not something I agree with.
3. Lets **vote in favor of keeping tighter restrictions**.
4. In my neighborhood - One area of particular concern is the South Campus of the University of Saint Thomas which lies within the MRCCA and has a further designation as a Primary Conservation Area (PCA). Under the new MRCCA rules, **this area is designated as a "River Town or Crossing" (includes institutional uses)**. This designation is incorrect as it is **neither a River Town nor a River Crossing and should not be labeled as such**. Let's go back to the old designation- PCA.

Thank you for listening!

Best,
K Schmitt

From: Renate Sharp <rmesharp@gmail.com>
Sent on: Wednesday, January 18, 2023 8:24:13 PM
To: Torstenson, Allan (CI-StPaul) <allan.torstenson@ci.stpaul.mn.us>
Subject: proposed changes to the MRCCA rules

Think Before You Click: This email originated **outside** our organization.

Dear Planning Commission Members,

I have concerns:

1. To the best of my knowledge, the changes to the MRCCA rules have **never been presented or discussed by the district councils**. Is this not a major neglect of citizen engagement?
2. Some of the changes in the MRCCA **rules appear to reduce environmental protections and loosen restrictions** allowing for greater development within the MRCCA.
3. It is my understanding that each city/municipality can vote to adopt these new rules or **to vote in favor of keeping tighter restrictions**.
4. One area of particular concern is the South Campus of the University of Saint Thomas which lies within the MRCCA and has a further designation as a Primary Conservation Area (PCA). Under the new MRCCA rules, **this area is designated as a "River Town or Crossing" (includes institutional uses). This designation is incorrect as it is neither a River Town nor a River Crossing and should not be labeled as such**. Furthermore, suggested future land use for this area is labeled "Civic and Institutional". This would likely allow for much more intense land development on the South Campus.

Thank you so much in advance for addressing my concerns.

Renate Sharp
536 Mt. Curve Blvd.
St paul 55116

From: K. Feilmeyer <kfeilmeyer@hamline.edu>
Sent on: Tuesday, January 10, 2023 9:25:51 PM
To: Torstenson, Allan (CI-StPaul) <allan.torstenson@ci.stpaul.mn.us>
Subject: Comment on Mississippi River Corridor Critical Area ordinance

Think Before You Click: This email originated **outside** our organization.

Dear Allan Torstenson,

Hello,

My name is Kimberly Feilmeyer and I am a resident of St. Paul. I am writing to you to express my support for St. Paul's proposed riverfront rules under the Mississippi River Corridor Critical Area (MRCCA) ordinance. The river is important to to both our ecosystem and our economic stability. Protecting the environment and sustainable development go hand in hand with the plans to reconnect and re-develop downtown Saint Paul with the Mississippi Riverfront.

Sincerely,
Kimberly Feilmeyer

Sincerely,
K. Feilmeyer
935 Linwood Ave.
Saint Paull, MN 55105

From: Mark Gilbert <markgilbert@pobox.com>
Sent on: Wednesday, January 11, 2023 3:00:02 AM
To: Torstenson, Allan (CI-StPaul) <allan.torstenson@ci.stpaul.mn.us>
Subject: Comment on Mississippi River Corridor Critical Area ordinance

Think Before You Click: This email originated **outside** our organization.

Dear Allan Torstenson,

Dear Mr. Tolbert and Mr. Torstenson,

I live near Grand and Fairview, and I often walk my dogs to the Mississippi. I write to support St. Paul's proposed riverfront rules for the MRCCA.

I'm a birder, so I especially appreciate the provision for bird-safe glass. We have a terrific variety of birds migrating and living along the river, but we have also lost a great many birds. We should do what we can to protect them.

I also think the height limits are a great idea. I am strongly in favor of upzoning and building more housing in St. Paul. But, I think the proposed height limits, stepping away from the river, are a good balance between allowing development and preserving the river for all.

Thanks for your consideration,
Mark Gilbert

Sincerely,
Mark Gilbert
1855 Lincoln Ave
Saint Paul, MN 55105

From: Kurt Klussendorf <kklussendorf@msn.com>
Sent on: Saturday, October 29, 2022 7:23:53 PM
To: Torstenson, Allan (CI-StPaul) <allan.torstenson@ci.stpaul.mn.us>
Subject: Proposed MRCCA Zoning for St Paul Feedback

Think Before You Click: This email originated **outside** our organization.

We think the new zoning is fantastic. Like the firm and sensible height requirements in the Corridor. The bird-friendly glass and lighting requirements are also excellent. Appreciate the time and thought that's gone into the effort.

We would have liked to see the changes sooner, of course. Unfortunately, some nonconforming project(s) have slipped into the queue ahead of these changes. Aside from that, excellent work.

Best,
Kurt and Barb Klussendorf
699 Woodlawn Avenue
St Paul, MN 55116

From: Kurt and Barb Klussendorf <kklussendorf@msn.com>
Sent on: Monday, January 16, 2023 9:27:03 PM
To: Torstenson, Allan (CI-StPaul) <allan.torstenson@ci.stpaul.mn.us>
Subject: Comment on Mississippi River Corridor Critical Area ordinance

Think Before You Click: This email originated **outside** our organization.

Dear Allan Torstenson,

PLEASE EDIT THIS

We are Kurt and Barb Klussendorf, residents of St. Paul. We have sent comments directly to Allan Torstenson but will follow up here as well.

We are writing to express support for St. Paul's proposed riverfront rules under the Mississippi River Corridor Critical Area (MRCCA) ordinance. The rules are well considered and reasonable. It's important to implement more restrictive building codes in the Mississippi River corridor to help protect it's scenic and wildlife resource. Lower building heights and bird friendly glass are great steps to protect this resource. We would have liked this implemented years ago in line with the wishes of the legislature, do it now!

Thank you,
Kurt and Barb Klussendorf

Sincerely,
Kurt and Barb Klussendorf
699 Woodlawn Avenue
St Paul, MN 55116

From: Georgia Kretz <gkretz@macalester.edu>
Sent on: Tuesday, October 18, 2022 4:47:32 PM
To: Torstenson, Allan (CI-StPaul) <allan.torstenson@ci.stpaul.mn.us>
Subject: Comment on Mississippi River Corridor Critical Area ordinance

Think Before You Click: This email originated **outside** our organization.

Dear Allan Torstenson,

Dear Mr. Tolbert and Mr. Torstenson,

Hi! I hope you're both doing well. My name is Georgia Gayle Kretz, and I am a resident of St. Paul. I am writing to you to express my support for St. Paul's proposed riverfront rules under the Mississippi River Corridor Critical Area (MRCCA) ordinance. This morning, I got up at 5:35AM to join the rest of my teammates on Macalester College's varsity crew team on one of our last practices of the season. It was a balmy 25 degrees Fahrenheit, but despite the below-freezing conditions, I rowed today to see the sunrise over the Mississippi--a sight which, though I have seen it many times, is so breathtaking that it keeps me coming back for even the earliest and most miserable practices. These newly proposed MRCCA rules would help preserve this riverfront as a space both for people and birds to enjoy safely, helping to protect a critical migration corridor and scenic spaces--and in some cases, as for the Dakota people, sacred spaces--alike.

I implore you to use your power to put these rules into law, and to protect the Mississippi River.

Best wishes,
Georgia GK

Sincerely,
Georgia Kretz
1600 Grand Ave
St. Paul, MN 55105

From: Pat Skinner <pat.skinner@unilev.com>
Sent on: Monday, January 23, 2023 5:18:16 AM
To: Torstenson, Allan (CI-StPaul) <allan.torstenson@ci.stpaul.mn.us>
Subject: FW: Reflections on the recent Press article regarding the Height of the AECOM project

Think Before You Click: This email originated **outside** our organization.

Mr. Torstenson:

Forwarding the comments below for your consideration.

Regards.

Patrick A. Skinner
General Manager
Chief Management Officer



Unilev Management Corp.
110 Wells Fargo Place
30 East 7th Street
St. Paul, MN 55101
(651) 229-2846 (direct)
pat.skinner@unilev.com
www.unilev.com
www.wellsfargoplac.com

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From: Pat Skinner <pat.skinner@unilev.com>
Sent: Sunday, January 22, 2023 10:49 PM
To: Pat Skinner <pat.skinner@unilev.com>
Subject: Reflections on the recent Press article regarding the Height of the AECOM project

All,

I am passing on some thoughts which followed a conversation I had with someone recently. My hope is that these thoughts also resonate with some or all of you and help inform any work you may be doing on this matter.

"I've been thinking about our conversation a week ago. A headline this past week about AECOM's proposed project helped me clarify in my mind one of the points we discussed and also serves to illustrate a second point I made. Just sharing observations.

We spoke at one point about not knowing what to do about the expansion of ownership of downtown assets by parties less committed to contributing to the downtown fabric and experience. This headline helped me formulate a response. There is nothing anyone can do about the purchasing of assets by less committed owners. BUT....The City can take control of the narrative – in other words pursue its game plan; not just react to the game and impact of others - and work to expand the universe of building stock that does contribute to the downtown experience. Over time the presence of less committed owners gets diluted by others who do care, theoretically. I don't know the details or the politics of the AECOM project. Perhaps it is a marginal project for some critical reason or reasons. But assuming it does have merit, what is the motivation to reduce the GLA and height of the project? I don't get it. Obviously it needs to be vetted from various perspectives, but get the deal done. We welcome more high quality space in the market; residential, office, hotel. Add quality and expand. Don't just fret about the growing attrition of marginal current stock that is under leased anyway. Play offense.

Second, to my comment that "St. Paul is uncoachable".. The optics of this headline and the story is that St. Paul never lets pass any opportunity to do mediocre. It is ok for the Council to over-ride the Planning Commission. A vision for downtown needs to be articulated and pursued. Unless there is some material flaw or mis-alignment in the market study, the land use compliance, financial ability of developers to perform, etc., etc., why would the City NOT support this project just because "it is too high"?? (And it is not too high....in my opinion.)"

Pat
Patrick A. Skinner
General Manager
Chief Management Officer



Unilev Management Corp.
110 Wells Fargo Place
30 East 7th Street

Finlay, Karoline (CI-StPaul)

From: Bill Weber <whweber@gmail.com>
Sent: Monday, January 23, 2023 8:28 AM
To: Finlay, Karoline (CI-StPaul)
Subject: Re: MRCCA

Think Before You Click: This email originated **outside** our organization.

Thank you for reaching out, Karoline. My address is below:

Bill Weber
141 4th St. E
Apt. 1220
Saint Paul, MN 55101

Bill

Bill Weber
404.964.1145 (m)

From: Finlay, Karoline (CI-StPaul) <karoline.finlay@ci.stpaul.mn.us>
Date: Monday, January 23, 2023 at 07:37
To: whweber@gmail.com <whweber@gmail.com>
Subject: MRCCA

Mr. Weber:

Thank you for your comment regarding the upcoming public hearing on the MRCCA zoning amendments. Community input is an important part of the process. In order for your written testimony to be included in the public record we will need your address. Please respond to this email if you would like your testimony included in the public record.

Thank you,

Karoline.

Karoline Finlay
Planning Secretary
Planning and Economic Development
25 4th St. W., 1400 City Hall Annex
Saint Paul, MN 55102
651-266-6641
karoline.finlay@ci.stpaul.mn.us
www.stpaul.gov



SAINT PAUL
MINNESOTA

From: Pereira, Luis (CI-StPaul) <Luis.Pereira@ci.stpaul.mn.us>
Sent on: Saturday, January 21, 2023 8:06:43 PM
To: Finlay, Karoline (CI-StPaul) <karoline.finlay@ci.stpaul.mn.us>
CC: Torstenson, Allan (CI-StPaul) <allan.torstenson@ci.stpaul.mn.us>
Subject: FW: RiversEdge

FYI, just received.

From: Bill Weber <whweber@gmail.com>
Sent: Saturday, January 21, 2023 1:02 PM
To: Pereira, Luis (CI-StPaul) <Luis.Pereira@ci.stpaul.mn.us>
Subject: RiversEdge

Think Before You Click: This email originated outside our organization.

Mr. Pereira:

I'm hoping that this can be accepted in lieu of printed comments on the draft rules regarding building heights in downtown St. Paul and the impact the existing rules would have on the proposed RiversEdge development.

My wife and I moved to St. Paul from Atlanta in late 2021 and live in the Pioneer-Endicott in Lowertown; I am a 3M employee and have no connection to AECOM or the St. Paul city government. We love it here and see so much potential for the city to grow in ways that make it more livable. Changing the current rules to allow for taller buildings is a great idea. What St. Paul needs most is more density because this leads to more people on the street and in the Skyway, and this improves everyone's safety, both real and perceived. It also, of course, produces more tax revenue. I would very much hope that a Skyway connection for RiversEdge is a requirement of the project.

Just as important as simply getting more people living downtown, density also leads to more businesses at street level and in the Skyway, and a more vibrant, diversified economy. If you think about the Upper West Side in Manhattan--one of the greatest urban neighborhoods in the United States--it has all of these things: density, a diversity of housing options (including low-income options), a diversity of businesses, and streets that always have people on them just living their lives. This could be St. Paul.

I am all for keeping St. Paul boring, but boring does not mean empty. We need more people to create a more vibrant community with more opportunity for everyone.

Please let me know if I need to reformat, print, and hand-deliver my comments on Monday for them to be heard by the Planning Commission. Thank you for considering this request.

Regards, Bill

Bill Weber
whweber@gmail.com | 404.964.1145

Finlay, Karoline (CI-StPaul)

From: H. Haynes <haynes_hl@yahoo.com>
Sent: Wednesday, January 18, 2023 8:55 AM
To: Finlay, Karoline (CI-StPaul)
Subject: I support the ordinance....

Think Before You Click: This email originated outside our organization.

And I hope you do too! The Mississippi River Corridor Critical Area ordinance is currently on so important for protection of this irreplaceable resource.

Warmly,

Heather Haynes

Sent from my iPhone

Finlay, Karoline (CI-StPaul)

From: H. Haynes <haynes_hl@yahoo.com>
Sent: Wednesday, January 18, 2023 12:46 PM
To: Finlay, Karoline (CI-StPaul)
Subject: Re: I support the ordinance....

Think Before You Click: This email originated outside our organization.

Thank you for following up! My address is 342 Arbor Street, St. Paul, MN 55102. Please include my comment in the public record.

Warmly,

Heather

Sent from my iPhone

On Jan 18, 2023, at 10:55 AM, Finlay, Karoline (CI-StPaul) <karoline.finlay@ci.stpaul.mn.us> wrote:

Ms. Haynes:

Thank you for your comment regarding the upcoming public hearing on the MRCCA zoning amendments. Community input is an important part of the process. In order for your written testimony to be included in the public record we will need your address. Please respond to this email if you would like your testimony included in the public record.

Thank you,

Karoline.

Karoline Finlay
Planning Secretary
Planning and Economic Development
25 4th St. W., 1400 City Hall Annex
Saint Paul, MN 55102
651-266-6641
karoline.finlay@ci.stpaul.mn.us
www.stpaul.gov
<image001.png>

-----Original Message-----

From: H. Haynes <haynes_hl@yahoo.com>
Sent: Wednesday, January 18, 2023 8:55 AM
To: Finlay, Karoline (CI-StPaul) <karoline.finlay@ci.stpaul.mn.us>
Subject: I support the ordinance....



HIGHLAND

DISTRICT COUNCIL

1978 Ford Parkway • Saint Paul MN 55116 • 651.695.4005 • HighlandDistrictCouncil.org

HDC Resolution to Support the City of St Paul's Zoning Code Amendments to the Mississippi River Corridor Critical Area (MRCCA)

WHEREAS on November 15, 2022 the Highland District Council (HDC) Development Committee discussed the proposed zoning code amendments to the Mississippi River Corridor Critical Area (MRCCA); and

WHEREAS the updated language will delete the current MRCCA ordinance and replace it with a new ordinance that is consistent with MN Rules 6106; and

WHEREAS the height limit for River, Towns and Crossings (RTC) is very limiting at 35' and the proposed language to allow for a Condition Use Permit (CUP) up to 65', is needed to help create development and housing on portions of the Highland Park neighborhood that are zoned RTC; therefore

Be it Resolved, that the Community Development Committee of the Highland District Council supports the proposed zoning code amendments suggested by the City of Saint Paul to the Mississippi River Corridor Critical Area.

Approved January 18th, 2023

By the Community Development Committee of the Highland District Council

Finlay, Karoline (CI-StPaul)

From: Pereira, Luis (CI-StPaul)
Sent: Friday, January 20, 2023 4:05 PM
To: Torstenson, Allan (CI-StPaul)
Cc: Finlay, Karoline (CI-StPaul)
Subject: FW: River Corridor Zoning

From: Dan Mollner <djmollner@gmail.com>
Sent: Friday, January 20, 2023 2:59 PM
To: Pereira, Luis (CI-StPaul) <Luis.Pereira@ci.stpaul.mn.us>
Subject: River Corridor Zoning

Think Before You Click: This email originated outside our organization.

Dear Mr. Pereira,

I am concerned by an article in the Pioneer Press describing potential adoption of the River Corridor Zoning rules which would restrict the height of downtown St. Paul buildings. I have not read the entire document, nor do I understand all of the issues involved, so my comments should please be interpreted narrowly on the downtown area.

I do not believe buildings in the downtown area should be restricted by height. Minneapolis is making great strides in increasing housing by building significant highrise living structures, several clearly visible from the river. St. Paul should not zone itself out of the market and out of potential housing increases. I fully realize our downtowns have different geography/geology, but beyond sympathy to safety of a collapsing bluff, St Paul airport considerations, etc. etc., height in itself should not be zoned out on the north side of the Mississippi between the old 7 Corners (Kellog and W7th St) and the CHS field. The downtown area is an already built area and we should maximize airspace whenever possible.

Sincerely,
Daniel Mollner
382 Arbor Street
St. Paul

January 20, 2023

Chair Morales and Planning Commissioners:

On behalf of the Saint Paul Port Authority, I thank you for the opportunity to comment on the proposed Mississippi River Critical Corridor Area (MRCCA) . As an economic development agency, we strongly support the exemptions on restrictions for river related uses. We are ecstatic that the City is in support of the working river and bringing river commerce to (and from) Saint Paul. We think this adds to the City's tax base, provides quality jobs, and supports the most environmentally efficient and safest mode of transportation.

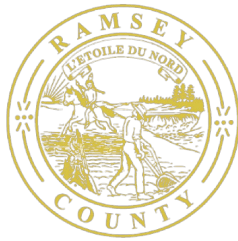
We're also excited to see all that is being done to revitalize downtown and the riverfront area. RiversEdge represents a great opportunity for Ramsey County to add vibrancy to the community while growing the tax base and increasing net new jobs. With that said, we oppose the height restrictions as recommended by staff for the Urban Core District. In fact, we believe they will severely limit development opportunities on this parcel and ultimately hinder The City's economic development efforts. As such, I strongly urge you to reconsider all height requirements in the Urban Core District of the Mississippi River Critical Corridor Area (MRCCA).

Thank you.



Todd Hurley
President
Saint Paul Port Authority

CC: Luis Pereira, Planning Director
Nicolle Goodman, Director, Department of Planning and Economic Development



TRISTA MATASCASTILLO
Ramsey County Commissioner
District 3

Ethan Osten
Phone: 651-266-8378

220 Courthouse
15 West Kellogg Boulevard
Saint Paul, Minnesota 55105
Phone: 651-266-8360

Dear Saint Paul Planning Commission,

On behalf of the Ramsey County Board of Commissioners, I ask that the Planning Commission reconsider the staff recommended code amendments for height requirements in the Urban Core district of the Mississippi River Critical Corridor Area. The City of St. Paul has been a great partner in championing economic vitality city-wide and particularly our downtown riverfront. Ramsey County has prepared a transformative project to redefine downtown Saint Paul and enhance the public viewshed along Kellogg Boulevard. The RiversEdge project reflects longtime shared goals of the City and County in growing tax base, catalyzing job growth, enhancing downtown vitality, and maximizing development potential. The amendment you are considering will have negative economic impacts on this vision.

As codified in Minnesota Administrative Rules, the Urban Core District of the Mississippi River Corridor Critical Area, “must be managed with the greatest flexibility to protect commercial, industrial, and other high-intensity urban uses, while minimizing negative impacts to primary conservation areas and minimizing erosion and flow of untreated storm water into the river. Providing public access to and public views of the river are priorities in the district”. These tenets are core to the vision of RiversEdge. We feel strongly that the proposed height restrictions as presented as part of this amendment will not be in alignment with the intention of the Urban Core district. Additionally, the Department of Natural Resources’ MRCCA Model Ordinance states that it is only *optional* to provide “specific height standards based on distance from the river that would be zoned/mapped”.

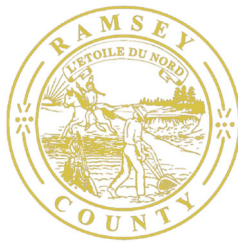
The Ramsey County Board of Commissioners selected AECOM as the developer for the former West Publishing and Ramsey County Adult Detention center site, referred to as RiversEdge, because of their bold vision and (and shared goals) through the creation of more than eight (8) acres of new, publicly accessible access to the riverfront as well as nearly a billion dollars of private investment. The proposed amendments would suppress development opportunities in downtown Saint Paul at a time in which development activity for residents and business is critically needed.

Additionally, as you are aware, the Saint Paul Downtown Alliance has undertaken a Downtown Investment Strategy Development Plan to accelerate the growth and development of the largest jobs center, most significant visitor destination, and fastest growing residential area in the east metro. It is worth noting the importance of this plan to revision downtown and seize the opportunities before us.

It is our hope that you understand how the proposed amendment will have a profound impact on the economic engine that is downtown Saint Paul. With that said, we ask that the Planning Commission revise the code amendments to exempt the Urban Core District from height restrictions and allow for each project to be reviewed against the goals of the comprehensive plan.

Respectfully,

Trista MatasCastillo
Chair, Ramsey County Board of Commissioners



TRISTA MATASCASTILLO
Ramsey County Commissioner
District 3

Ethan Osten
Phone: 651-266-8378

220 Courthouse
15 West Kellogg Boulevard
Saint Paul, Minnesota 55105
Phone: 651-266-8360

Dear Saint Paul Planning Commission,

I write to you with strong reservations regarding the River Corridor and Floodplain Overlay Zoning Amendments. As you, other elected officials and staff from the City of Saint Paul are aware, Ramsey County has prepared a transformative project to redefine downtown Saint Paul along the riverfront. The RiversEdge project reflects longtime shared goals of the City and County in growing tax base, be a catalyst for job growth, enhance downtown vitality, and maximize development potential. The amendment you are considering will have severe impacts on this vision.

As codified in Minnesota Administrative Rules, the Urban Core District of the Mississippi River Corridor Critical Area, "must be managed with the greatest flexibility to protect commercial, industrial, and other high-intensity urban uses, while minimizing negative impacts to primary conservation areas and minimizing erosion and flow of untreated storm water into the river. Providing public access to and public views of the river are priorities in the district".

In review of the proposed amendment, the height restrictions in the urban core district are severely limiting to the future of this site and to other parcels along the River corridor. As we understand, the height restrictions with which these were based off were developed in the 1930s, nearly a century ago when automobile traffic was initially increasing. Now, we are envisioning modes of transportation beyond automobiles, with considerable investment in public transit throughout downtown Saint Paul. It is of great concern that the City of Saint Paul intends to implement these outdated restrictions, instead of taking this opportunity to redefine the future of downtown Saint Paul to better meet the needs of residents and businesses.

The Ramsey County Board of Commissioners selected AECOM as the developer for the former West Publishing and Ramsey County Adult Detention center site, referred to as RiversEdge, because of their bold vision to create more than eight (8) acres of new, publicly accessible access to the riverfront as well as nearly a billion dollars of private investment which would benefit the City of Saint Paul as much as it would Ramsey County. Incorporating new standards would be an ideal opportunity to harness the energy around developments such as RiversEdge, the River Balcony, and the redevelopment of the River Centre Ramp to provide a new vision for what downtown Saint Paul can be.

Additionally, the Saint Paul Downtown Alliance has undertaken a Downtown Investment Strategy Development Plan in order to accelerate the growth and development of the largest jobs center, most significant visitor destination, and fastest growing residential area in the east metro. It is worth noting the importance of this plan to revision downtown and seize the opportunities before us since the City's latest revisions to the Downtown Development Strategy was last amended in 2005.

We share in the Downtown Alliance's ask that the Planning Commission delay consideration until a Development Plan and subsequent community engagement have occurred. If this cannot be accommodated, we request that the Planning Commission delay consideration until January 20, 2023. This amendment will have a profound impact on the economic engine that is downtown Saint Paul and engaging more of the community is critical to ensure a community voice drives our planning.

Sincerely,

Trista MatasCastillo
Ramsey County Commissioner, District 3



THE PARK AT RIVERSEDGE

Investing in a new, vibrant public space on one of Minnesota's greatest natural resources

The Park at RiversEdge is a nine-acre urban park that will create a new, dynamic connection between downtown Saint Paul and the Mississippi River.

By extending over the railroad and Shepard Road and connecting to the Mississippi River, The Park at RiversEdge will expand access to a national monument for residents and visitors alike, and spark millions of dollars of private investment as part of AECOM's proposed development.

The Park at RiversEdge includes:

- ✔ 9+ acres of new urban park space, including a dynamic community gathering space for public events.
- ✔ Expanded public access to the Mississippi River from the downtown bluff to the shoreline.
- ✔ Trails that connect people to the Mississippi River, downtown Saint Paul and other regional trail systems.
- ✔ The first section of the proposed River Balcony, acting as a catalyst for several projects along Saint Paul's riverfront.

A state investment of \$26 million for the acquisition, design, furnishing and construction of The Park at RiversEdge, along with Ramsey County's match, is how we can make this premier yet challenging location work to its highest and best use, to encourage private development that boosts jobs, tax base, and access to the park space and the only national park on the Mississippi River. The public park space and the private development are intrinsically linked. Public funding of The Park at RiversEdge will foster millions of dollars in private development.

➤ May 2015 - November 2017

Ramsey County invests \$17 million to clear outdated county buildings and remediate the site, preparing it for highest-and-best-use development.

➤ November 2018

Ramsey County and AECOM enter into preliminary development agreement for RiversEdge.

➤ January 2020 - Current

Ramsey County seeks state funding for The Park at RiversEdge.

➤ 2022

Ramsey County and AECOM finalize development agreement for RiversEdge (anticipated).

➤ Ongoing

Community and stakeholder engagement.

Additional information ➔



LEARN MORE:
ramseycounty.us/RiversEdge



RAMSEY COUNTY



SITE CONCEPTS >



Sparking \$800+ million in private development

RiversEdge is an innovative public-private partnership that will be transformational for our region, especially as we move into economic recovery from COVID-19. The interwoven pieces of public park, office space and housing can position the region as a place where Minnesotans want to stay and where professionals from around the country want to move.

RiversEdge will:

- Connect residents and visitors to the only national park located on the Mississippi River.
- Support the vision of a stronger, more equitable region.
- Attract residents and businesses, significantly adding to the tax base.
- Put Minnesotans back work with 5,000 jobs created.



The First Leg of the River Balcony

The Park at RiversEdge will be a signature public space and the first leg of Saint Paul's River Balcony, a 1.5-mile promenade connecting parks, civic landmarks and private development along the Mississippi River bluff. With community engagement and schematic design underway, Ramsey County is collaborating with the Great River Passage Conservancy to ensure a cohesive vision for these regional destinations. These projects follow the successful models of other urban river walks that have spurred significant private investment and attracted visitors from across the country.

LEARN MORE: ramseycounty.us/RiversEdge

JENNIFER O'ROURKE

Director of Government Relations

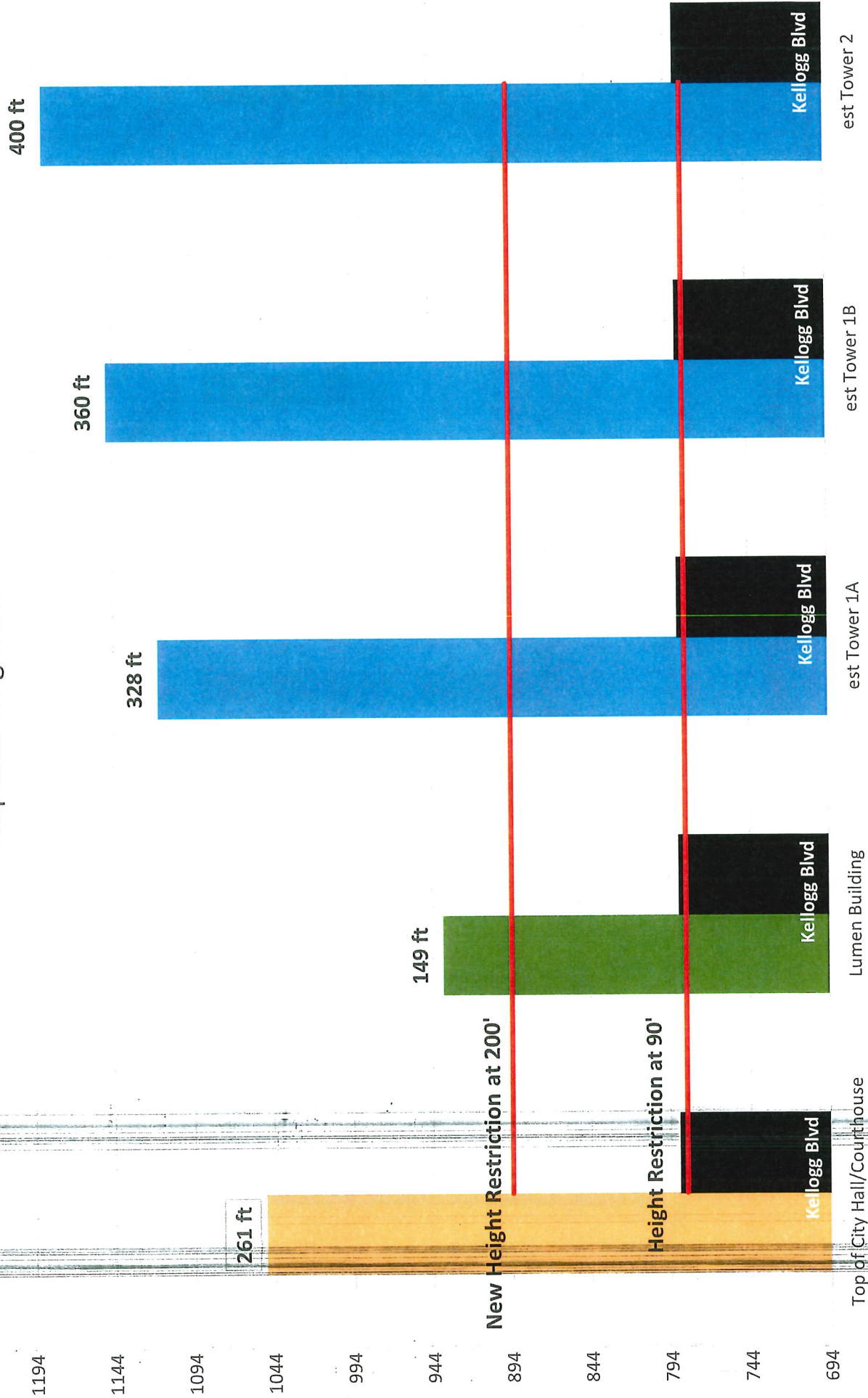
651-724-3461 • jennifer.o'rourke@ramseycounty.us

KARI COLLINS

Director of Community & Economic Development

651-302-4455 • kari.collins@ramseycounty.us

Proposed Height Restrictions



New Height Restriction at 200'

Height Restriction at 90'

est Tower 2

est Tower 1B

est Tower 1A

Lumen Building

Top of City Hall/Courthouse

400 ft

360 ft

328 ft

149 ft

261 ft

1194

1144

1094

1044

994

944

894

844

794

744

694

Kellogg Blvd

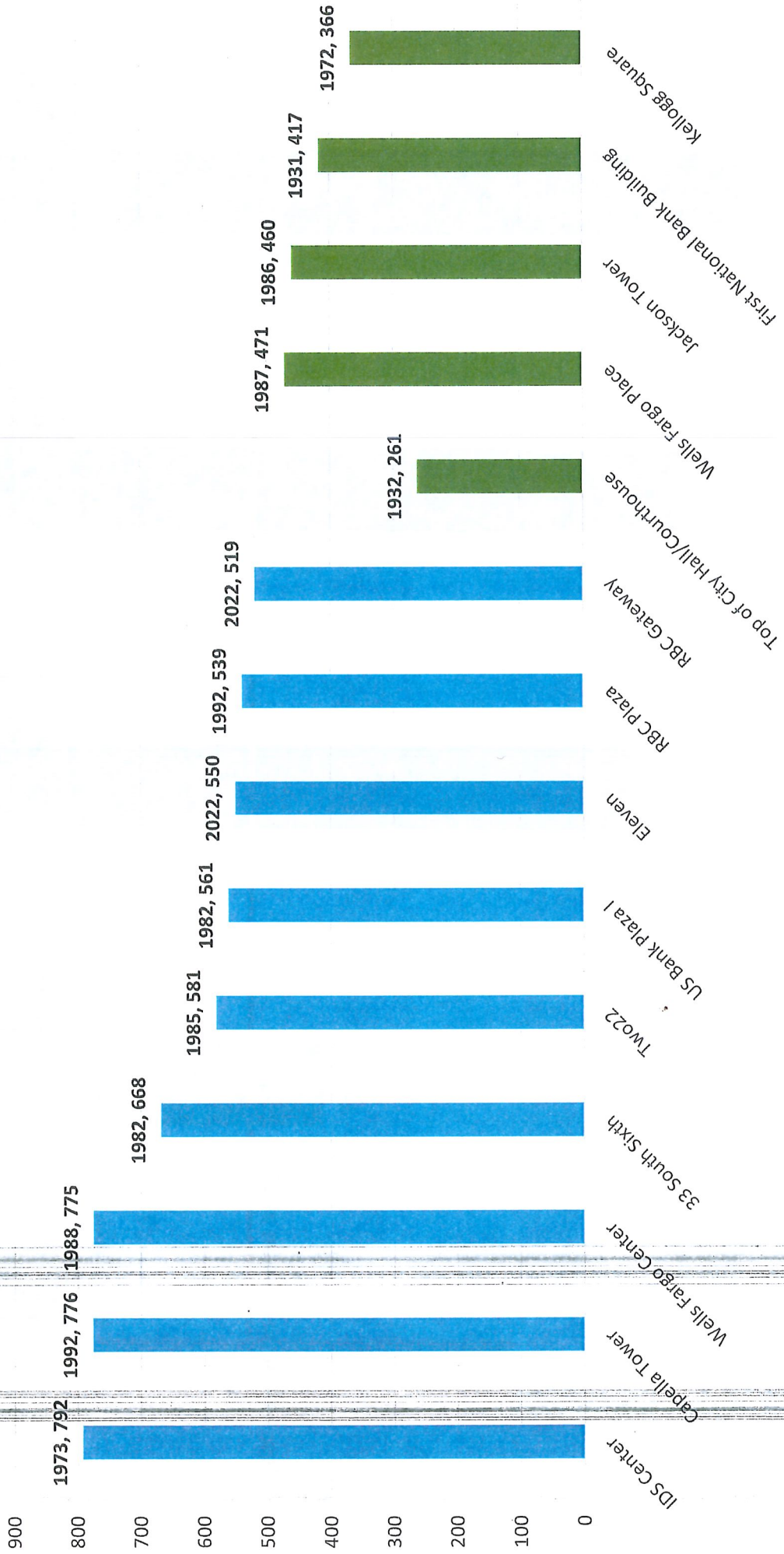
Kellogg Blvd

Kellogg Blvd

Kellogg Blvd

Kellogg Blvd

Building Heights, Minneapolis vs. Saint Paul





January 13, 2023

Allan Torstenson
City Planner
Department of Safety and Inspections
375 Jackson Street
Saint Paul, MN 55101

Mr. Torstenson,

Ryan Companies is submitting this letter for public comment in regards to the River Corridor and Floodplain Overlay Zoning Amendments topic on the January 20, 2023 Planning Commission agenda.

With regards to the proposal of the boundaries we would like to note the discrepancy in boundary alignment in the area of the Highland Bridge development (Ford Site) and parcel commonly known as the CP Rail parcel. The areas both north of Ford Parkway and south of Hampshire Avenue have boundaries for the overlays which follow the public roadways whereas the Highland Bridge Site and the area commonly known as the CP Rail do not. We suggest that the city and DNR consider modifying the district boundaries in this area to avoid confusion and issues arising from properties bisected by these lines. Please see attached visual exhibit for reference.

If you should have further questions regarding this matter I may be reached at 612-599-9945 or Maureen.michalski@ryancompanies.com.

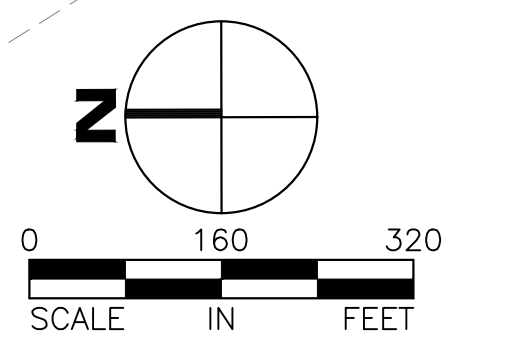
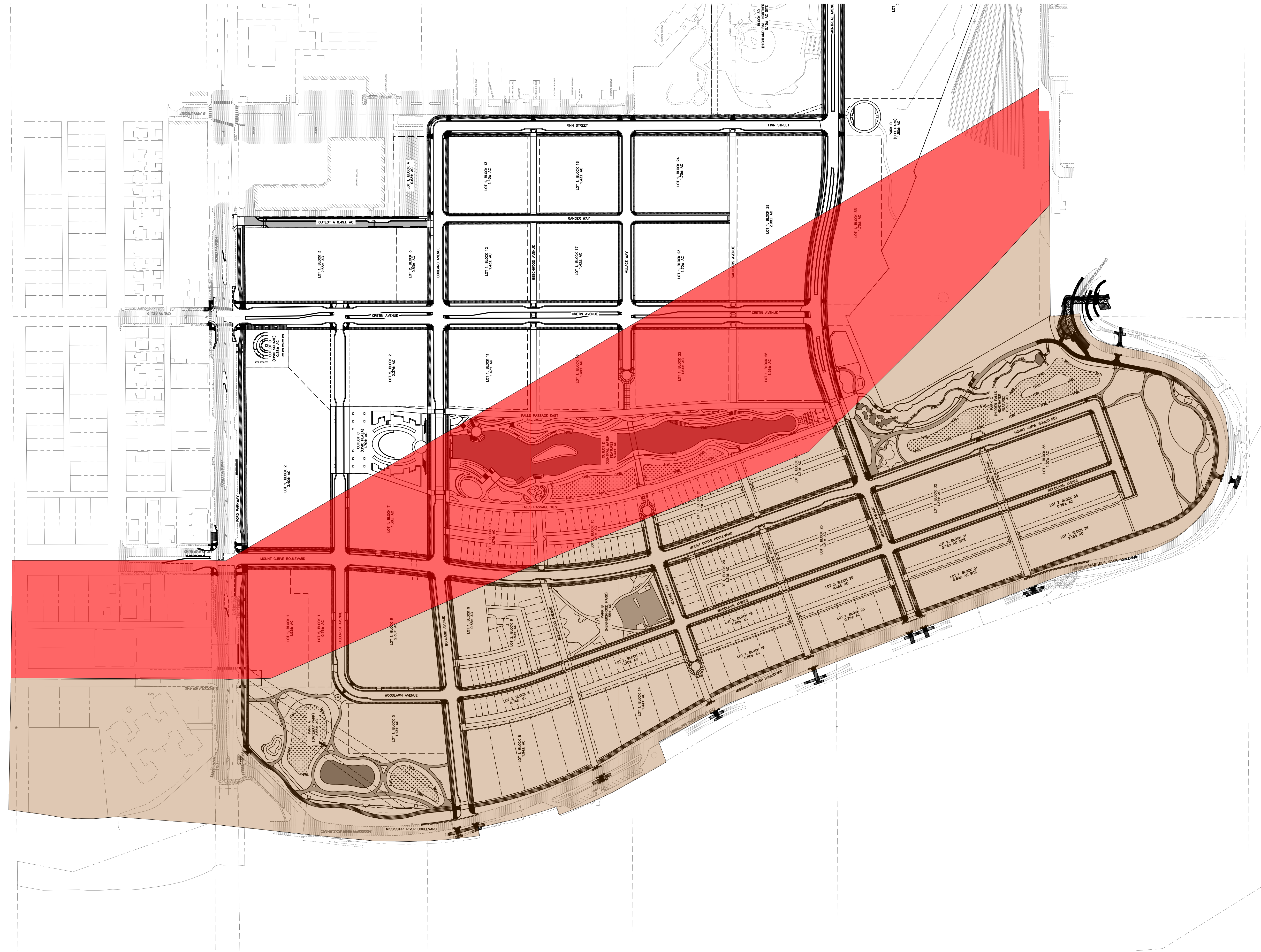
Kind Regards,

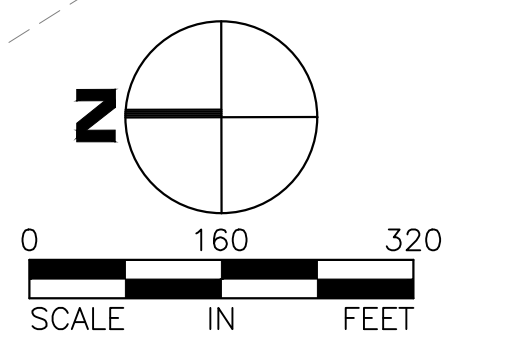
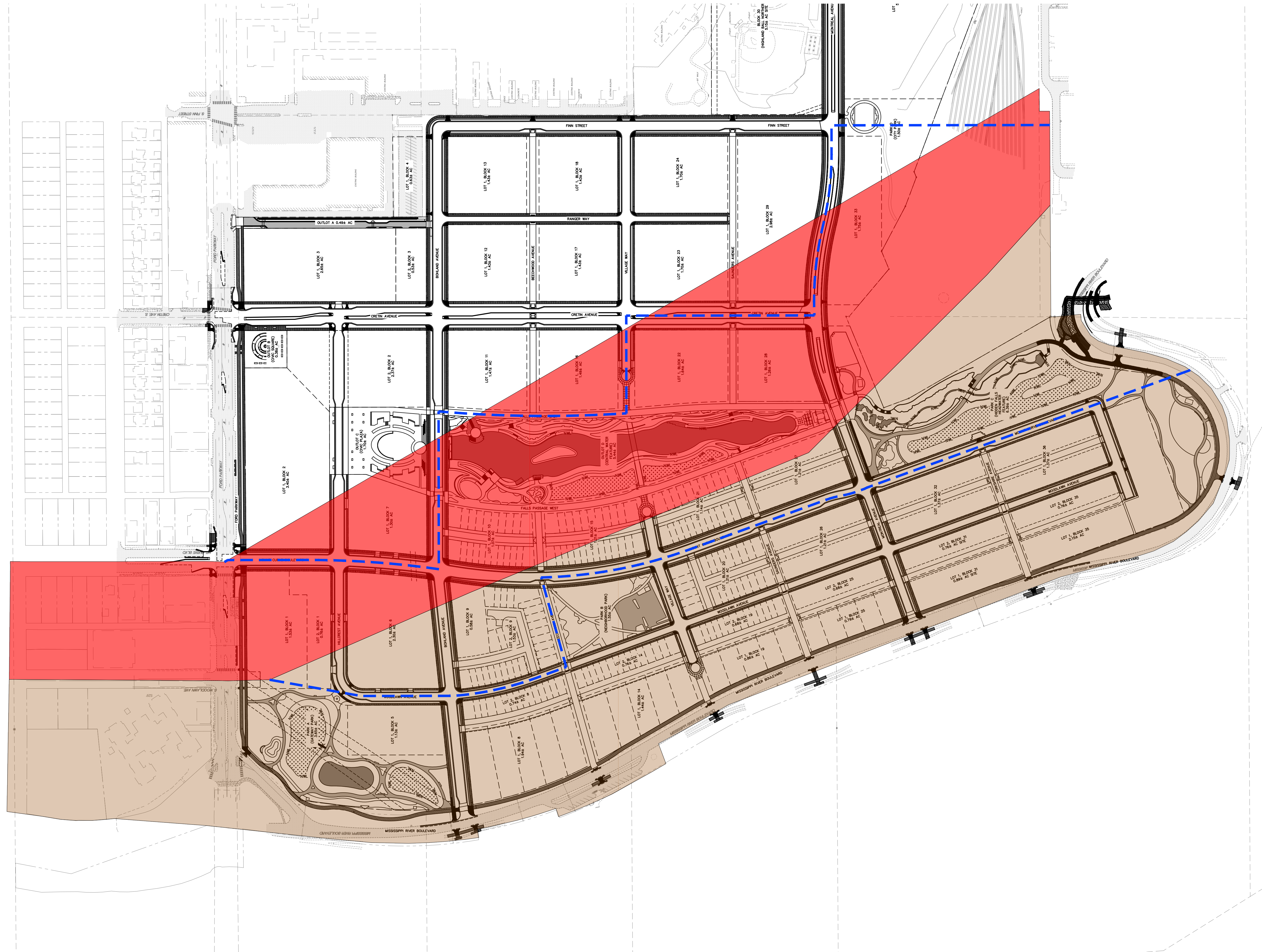
Maureen Michalski
Vice President, Real Estate Development

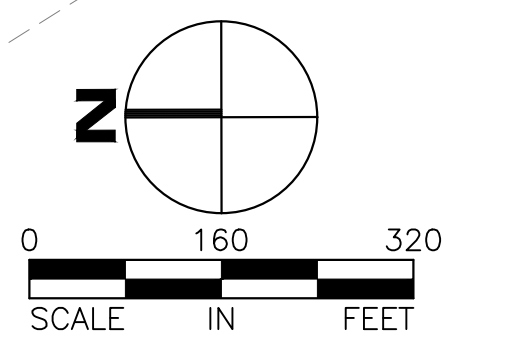
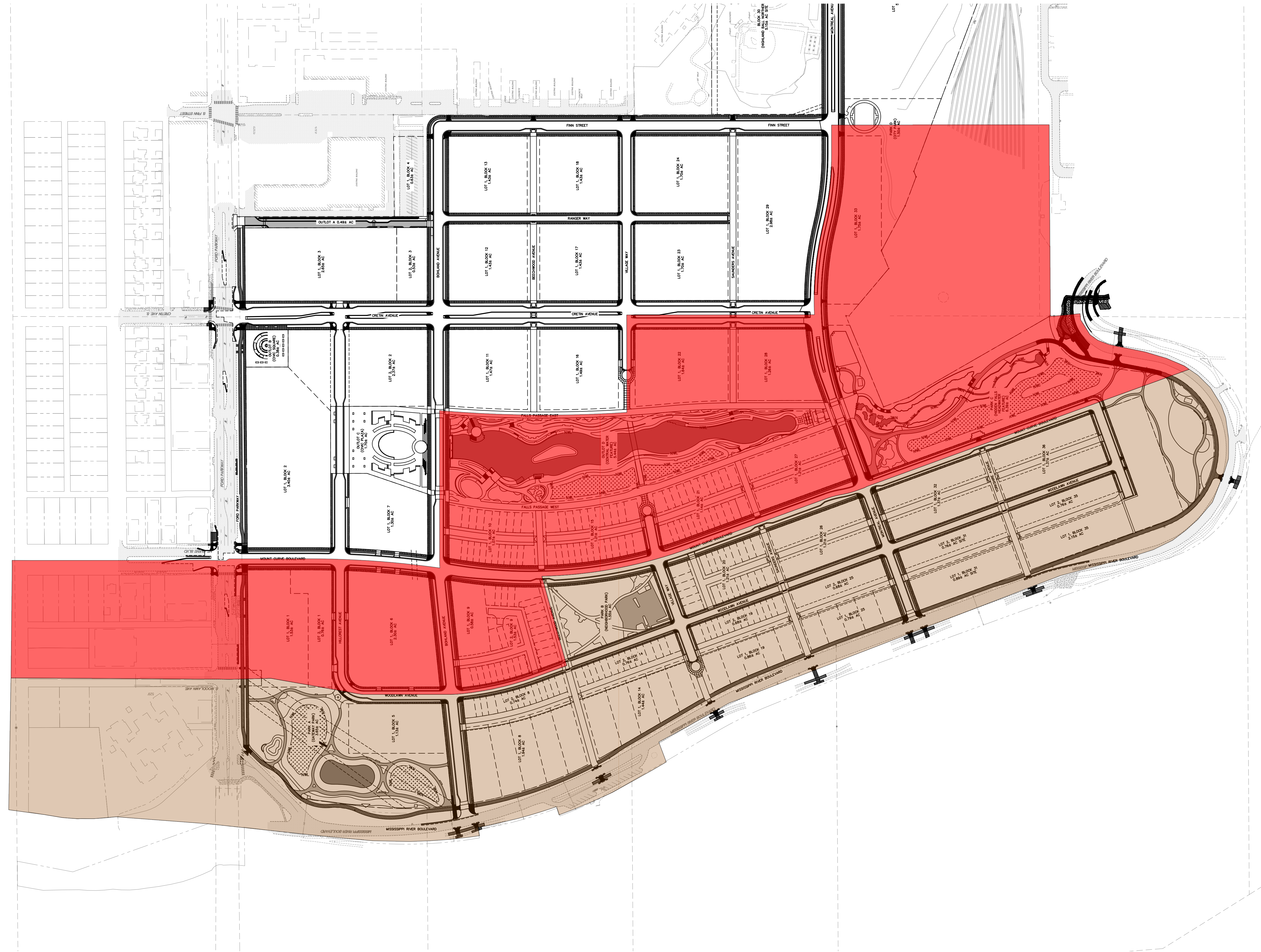
Ryan Companies US, Inc.
533 South Third Street, Suite 100
Minneapolis, MN 55415

p: 612-492-4000
ryancompanies.com

Equal Opportunity Employer







401 N Robert Street, Suite 150
St. Paul, MN 55101

January 19, 2023

via email

Chair Morales and Planning Commissioners:

On behalf of the 1700+ members and affiliates of the St. Paul Area Chamber, who together represent more than 3 million employees and their families, thank you for the opportunity to comment on the proposed River Corridor and Floodplain Overlay Zoning Amendments. I ask that you reconsider the staff recommended amendments for height requirements in the Urban Core District of the Mississippi River Critical Corridor Area (MRCCA).

As you are aware, exciting efforts are underway to revitalize downtown St. Paul and the riverfront area. The RiversEdge project being championed by Ramsey County not only serves as a catalyst for tax base growth and new jobs but will provide the public with an enhanced riverfront experience. Unfortunately, the height restrictions laid out in these amendments will have a significant negative impact on this project by limiting development opportunities on this parcel.

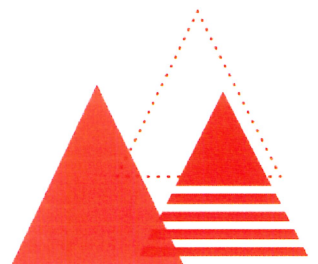
Significant vision, planning, and investment has gone into the RiversEdge project. I ask that the Planning Commission please exempt the Urban Core District from the height restrictions and allow for projects to continue to be reviewed against the goals of the comprehensive plan. At a time when the City of St. Paul desperately needs an infusion of housing and property tax value, action to impede this project would be detrimental to its growth and vitality.

Respectfully,



B Kyle
President & CEO
St. Paul Area Chamber

CC: Luis Pereira, Planning Director
Nicolle Goodman, Director, Department of Planning and Economic Development



Finlay, Karoline (CI-StPaul)

From: Amanda Duerr <amanda@stpaulchamber.com>
Sent: Thursday, January 19, 2023 2:40 PM
To: Finlay, Karoline (CI-StPaul)
Cc: Pereira, Luis (CI-StPaul); Goodman, Nicolle (CI-StPaul)
Subject: Public Comments for Jan. 20 Planning Commission
Attachments: 01.19.23 Planning Commission.pdf

Think Before You Click: This email originated outside our organization.

Hello Karoline,

On behalf of the St. Paul Area Chamber, could I submit the attached as public comment for the Jan. 20 Public Hearing on the River Corridor and Floodplain Overlay Zoning Amendments? Please let me know if there is a different process I should follow to get them on the public record.

Thank you,



Amanda Duerr
Vice President of Public Affairs
D | 651.265.2788

