



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

360 North Robert Street p: 651-222-2193
Suite 400 f: 651-222-6005
St. Paul, MN 55101 w: www.fmr.org

City of Saint Paul Parks Commission
25 West 4th Street
City Hall Annex
St. Paul, MN, 55102

FMR Comments on the Resolution #16-03 Concerns about MRCCA rules

Dear Members of the Park & Recreation Commission,

Friends of the Mississippi River. FMR is a local non-profit community-based organization that works to protect and enhance the natural and cultural assets of the Mississippi River and its watershed in the Twin Cities.

We have approximately 2,300 active members, and more than 3,000 active volunteers who care deeply about the river's unique resources. For more than a decade, FMR staff, board and members have played an active and ongoing role in helping to shape the future of the St. Paul riverfront.

FMR served on the Task Forces that provided advice for development of the Great River Passage Plan, the Lilydale Regional Park Master Plan, and the Indian Mounds Park Regional Park Master Plan. We also work closely with Adam Robbins and his staff to conduct ongoing habitat restoration at Crosby Farm Park and Indian Mounds Park. I have a great appreciation for the genuine commitment St Paul Parks has to ecological restoration and management of natural areas in the river valley, and I thank you for those opportunities to work together to improve our great river.

We are writing today to express our disappointment in the resolution before you regarding draft rules for the Mississippi River Corridor Critical Area. FMR is in strong support of the new rules, and we believe they will ensure the many unique qualities of the Mississippi River are protected for current and future generations. We see no reason for the Parks Commission to object to these rules as they are aimed at meeting many of the same goals St. Paul has for its riverfront parks.

We believe that the concerns noted on the second page of the resolution have already been resolved in the draft MRCCA rules, and we have provided text from the rules to demonstrate this. We request that you either modify the resolution or vote against it.

From the draft Resolution #16-03

WHEREAS, the Commission has concerns about the Draft Rules regarding but not limited to on buildings height limits and rivers setbacks for park buildings and other park

6106.0130 GENERAL DEVELOPMENT STANDARDS FOR PUBLIC FACILITIES.

- Subp. 3C. State or regional agencies, special purpose units of government, local park agencies, and **local units of government with parks within their jurisdiction are not required to obtain a vegetation management or land alteration permit** under part 6106.0150 or 6106.0160, but must apply the standards and criteria that would be applied by local government, were a permit required;

From the draft Resolution #16-03

WHEREAS, the Commission also finds the Rural Open Space (ROS) district designations in St. Paul to be inappropriate for urban parkland and supports City comments recommending a new Urban Open Space district that reflects an urban location that is consistent with current and future urban park facilities in the Critical Area; and

The Rural **AND** Open Space District does not just apply to rural areas – it applies to areas with low density development and high quality habitat. Therefore it is very appropriate for St. Paul’s urban parks that include significant bluff and floodplain habitat. Namely, Hidden Falls, Crosby, Lilydale, Indian Mounds and Pig’s Eye.

The Urban Core District includes language that permits projects such as the proposed River Balcony.

From the Draft MRCCA Rules

6106.0100 DISTRICTS.

Subp. 3. Rural and open space district (CA-ROS).

A. The rural **and open space** district (CA-ROS) is **characterized by** rural and **low-density development patterns and land uses**, and includes land that is riparian or visible from the river, as well as large, undeveloped tracts of high ecological and scenic value, floodplain, and undeveloped islands. Many primary conservation areas exist in the district.

B. The CA-ROS district must be managed to sustain and restore the rural and natural character of the corridor and to protect and enhance habitat, parks

Subp. 8. Urban core district (CA-UC).

A. The urban core district (CA-UC) includes the urban cores of Minneapolis and St. Paul.

B. The CA-UC district 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**