



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

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Anne Gardner
City of St. Paul Parks and Recreation

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Dear Anne:

Friends of the Mississippi River (FMR) appreciates the opportunity to share comments on the revised draft design scheme for the River Learning Center (RLC). As longtime supporters of the RLC vision, we look forward to the day when the RLC facilities, amenities, and programs support a large and diverse range of experiences with the Mississippi River and river and our national park.

The most recent design scheme does a better job of accommodating this diverse range of recreational uses in different areas of the site. It's easier to envision visitors enjoying their desired activities without disrupting each other.

However, the success of this design depends on the feasibility of important details that need further vetting. Any one of these feasibility issues could have a major impact on whether the proposed design scheme can actually meet its highest priority goals.

For instance, if the DNR won't permit dredging of the western bay for paddle programs, the paddle programs would need to fit into the eastern bay alongside the marina, requiring the marina to reduce its footprint. Or if the National Park Service office building won't fit on top of the bluff due to right-of-way issues, those uses would need to be scaled back.

Because the schematic design process has made it clear that there's not enough space on the floodplain to fit the proposed scale of the project, any one of the above complications would require a significant redesign to fit all uses into a smaller area. This is why we hope to see these feasibility issues addressed in more detail as soon as possible. We've outlined a few of our questions below.

Is the western bay suitable for paddle programs?

FMR believes that motorized boating is a fun and important way for people to enjoy our great river, and we welcome its presence at the RLC. While canoeing and kayaking tend to be more accessible in terms of cost, motorized boats can be more accessible for visitors of varying

abilities, ages, and interests. The RLC should accommodate both motorized and non-motorized boaters and offer rental programs for both.

One of the reasons this site was chosen for the RLC is because it has protected bays where people can learn to canoe or kayak sheltered from the challenge of the river current, yet venture out into the main channel as they're ready. There are few places on the Mississippi where this is possible. Motorized boats can more easily use other parts of the river and other marinas. Paddle programs, however, don't have another similar place to go if they aren't properly accommodated here.

For the RLC to provide a world-class canoe and kayak experience befitting a national park headquarters, the paddle program needs a high-quality area designed and maintained for this use. This area needs to be sufficiently large to accommodate many boats at once, helmed by paddlers who might not yet be skilled at maneuvering in crowded spaces. The water area may also need to be large enough to accommodate some docks.

In its current state, the western bay is too small for group paddling programs because so much of it is silted in. A full loop from the entrance, around the passable areas of the bay, and back out is under a quarter mile. It only takes a minute or two to paddle from one end to the other. In drier summer months, the water in the bay is only a foot or two deep, and the silty shallow areas are not places where one might easily step out to push a misguided boat back into deeper water. The silt is so mucky that people will sink in several inches and possibly lose their shoes as they struggle to get out.

All of this is to say: yes, it's technically possible to paddle in the western bay now. But it's not the high-quality setting needed for group paddling instruction and enjoyable outings.

The next phase of RLC design must address this issue in more detail. Questions that the design team needs to answer include:

1. How much water area do program partners need for paddle programs and docks?
2. Will the DNR permit dredging of the western bay? How much will that cost?
3. Does the island *need* to be created to compensate for altering the western bay? How much will it cost to create the island?
4. If the island channel can't be created for any reason, does that affect the design, hydrology, or shoreline topography of the western bay?
5. If the western bay isn't big enough to meet partners' needs and can't be dredged, how will paddle programs be accommodated in the eastern bay? How would the marina design or scale change to provide canoers and kayakers with a safe, sheltered, and peaceful experience?

How will marina operations coexist with quieter recreational uses?

The updated design scheme does a better job of reducing potential conflicts between the wide range of activities the RLC and marina will offer. Still, we're concerned that some normal

marina activities could be in conflict with and disruptive to the quiet enjoyment of the natural river experience that many visitors to the RLC will be seeking. We think there's opportunity to further improve the visitor experience through site design.

Again, FMR welcomes motorized boating at the RLC. But marina operations are one of the RLC uses most likely to disrupt other visitors with noise, traffic, or visual impacts. These disruptions can be limited through both design and management of the site.

We recommend incorporating the following design elements:

- Indoor boat building and maintenance space where noise, odors, and other unavoidable impacts of boat maintenance can be contained
- Visual screening of boat storage areas (such as a fence along the eastern edge of the parking lot)
- Minimize the visual impact of the gas dock on the riverfront (limit structures, bury or screen fuel tanks, etc.)
- Minimize the visual impact of all RLC and marina campus structures through use of brown and green building materials, flat or low-pitch roofs, landscaping, etc.

We'd also like to see any future marina operators be contractually obligated to a high standard of site maintenance and operations. Requirements should include:

- Limited on-shore boat storage, with little or no storage allowed in the summer and a reasonable cap on winter numbers
- Requirement to use brown, green, or white tarps and boat wrap during storage
- Limits on when and where noisy boat maintenance tasks can be conducted
- High standards for facility upkeep
- A clear, timely process for resolving any contract non-compliance

In the recent past, Watergate Marina operators have not been held to this kind of standard. If this area is to serve a much larger, wider range of visitors than it currently does, and to be a crown jewel of our national park, then the city must commit to better oversight in the years to come.

Can a blufftop building fit within the space constraints?

We welcome and appreciate locating some RLC building space on top of the bluff to minimize what needs to be built along the river. Offices and other functions that don't need to be next to the river can be less obtrusive at the top of the bluff.

However, the buildable space at the top of the bluff is extremely constrained due to setback requirements from both the bluff and Shepard Road. This project must be a shining example of full compliance with Mississippi River Corridor Critical Area (MRCCA) rules, including bluff setbacks and structure height limits, so we request further study to ensure that this building can fit here without needing any MRCCA variances.

Is the canopy walk feasible and MRCCA-compliant?

Because of the RLC's setting in the heart of the city, it's important to accommodate visitors of all abilities arriving by all modes of transportation. The RLC must be welcoming to those arriving on foot; by transit or school bus; and with bikes, wheelchairs, and strollers. A good design will make these modes appealing enough to reduce car traffic and parking.

Of course, the steep descent from the bluff to the river presents a challenge to people walking, biking, and rolling. The proposed canopy walk is the best proposed solution we've seen so far, but it needs further refining. We'd like the design team to collaborate with the DNR to ensure that the canopy walk complies with MRCCA rules regarding structure height, bluff setbacks and alterations, and minimizing the structure's visibility from the river.


We dislike the current canopy walk layout that brings the ramp across the river-facing side of the learning center. The view from the classrooms and common areas of the learning center should emphasize the natural setting that people are coming here to experience: trees, plants, water. Tall concrete or steel pillars and overhead walks detract from this. We hope this layout is revised in future designs.

Thank you again for the opportunity to participate in the RLC design process. We look forward to working with you, the RLC partners, and community members to bring this special place to reality.

For the river,



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Executive Director



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Land Use & Planning Program Director

CC:

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