FES 95-1
Vol. 2 of 2

Final

Comprehensive Management Plan Environmental Impact Statement

Volume Two: Comments and Responses on the Draft Environmental Impact Statement



MISSISSIPPI

National River and Recreation Area • Minnesota

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Final
Comprehensive Management Plan
Environmental Impact Statement

Volume Two: Comments and Responses on the Draft Environmental Impact Statement

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MISSISSIPPI

National River and Recreation Area
Anoka, Ramsey, Washington, Dakota, and Hennepin Counties, Minnesota

The Mississippi National River and Recreation Area was designated by Congress in 1988. The Mississippi River Coordinating Commission was established by the act to ensure local assistance to the secretary of the interior in planning for the national river and recreation area. The legislation provided for extensive federal, state, and local coordination in managing the river corridor and its nationally significant historical, recreational, scenic, cultural, natural, economic, and scientific resources.

The basic visions identified for the national river and recreation area would promote partnerships among the corridor's political entities and various constituencies to create the desired future and achieve the legislative purpose for the 72-mile-long corridor through the Twin Cities area. The comprehensive management plan and environmental impact statement provides a proposal that emphasizes a balanced and integrated approach to resource protection and sustainable use and development in the river corridor. Alternatives offer a range of options for issues identified in the plan. A no-action alternative (A) is included to facilitate comparison. Alternative B would emphasize greater resource protection than the proposal; alternative C would emphasize greater use and development than the proposal. Impacts of the proposed plan and the three alternatives are assessed in this document. Both positive and negative impacts to the natural, cultural, and socioeconomic environments are assessed.

The final environmental impact statement will be forwarded to the secretary of the interior for approval. A record of decision can be issued 30 days after publication of release of the document in the *Federal Register*.

This volume includes the comments from agencies, organizations, businesses, and groups on the draft environmental impact statement and the National Park Service and commission responses. The purpose and need for the plan, the final comprehensive management plan and alternatives, the affected environment, environmental consequences, consultation and coordination, the list of preparers, and appendixes are contained in volume one. For further information about this document, contact:

Superintendent, Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418, Box 41
St. Paul, MN 55101
612-290-4160

Prepared by
Mississippi River Coordinating Commission and National Park Service

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United States Department of the Interior
October 1994

SUMMARY

PUBLIC AND AGENCY REVIEW

The *Draft Comprehensive Management Plan/Environmental Impact Statement* (DGMP/EIS) for the Mississippi National River and Recreation Area was available for public review from July 5 to October 11, 1993. Public hearings were held during July 1993. The public review record for the document includes all public testimony received during the hearings and all letters received through November 7, 1993, the day before the first commission meeting was held to discuss public review comments. Approximately 1,850 copies of the document were distributed to state and federal officials, local governments, interested agencies and organizations, individuals, and regional public libraries.

The National Park Service received over 250 written responses during the public input period and many hours of testimony during the public hearings. These included letters from five federal agencies, nine state agencies, and 36 local agencies. Letters were received from about 50 organizations, including environmental groups, neighborhood organizations, labor groups, and business interests. Letters were also received from about 160 individuals, of which 41 were virtually identical. A resolution circulated by the Minnesotan's for the Mississippi was received from 56 persons.

Each member of the Mississippi River Coordinating Commission received copies of all letters, written statements, and transcripts of oral statements made at the hearings or received during the public review period. These were copied in three volumes that are available for reference at the MNRRA headquarters. All comments were summarized in a series of public input reports developed by the planning team to facilitate responses by the commission, and the comments were used to develop the final comprehensive management plan and environmental impact statement. The public input reports are also on file at MNRRA headquarters.

In analyzing the public hearing testimony, it was determined that the comments and recommendations were also contained in written statements either from the person who testified or in other written comments. To eliminate some duplication, the responses to the written testimony will also serve to respond to the oral testimony.

CITIZEN COMMENTS

The citizen letters included many excellent comments and recommendations. However, the letters from individuals were voluminous and contain many similar comments; therefore, as allowed under federal regulations for preparing final environmental impact statements, the most frequent substantive comments are summarized and responded to below. All citizen letters are attached, but they are not individually responded to in this document. All comments were analyzed and addressed by the NPS planning team and the commission in preparing the final plan and environmental impact statement.

The comments from individuals tended to either support the proposed action or alternative B or less restrictive actions, with less support for the status quo or alternative C. Many of the

letters from individuals requested clarification of the Land Use and Protection Policies section of the proposed plan. These clarifications were also requested by various agencies, organizations, and business interests. Responses to those comments are included below.

The citizen comments were analyzed and grouped into categories based on their similarity. A summary of the most frequent citizen comments and the Mississippi River Coordinating Commission/National Park Service response follows.

(1) Concern was expressed about land being condemned by the Park Service.

Response: The draft plan stated that condemnation would only be used as a last resort in rare cases of severe threat to important sensitive resources. Clarifying language was added to the final plan to show that the National Park Service does not plan to use condemnation to implement the general open space and trail proposal.

(2) Support of the trails and open space concept was expressed.

Response: Support from MNRRA's partners and neighbors would be crucial in order to ensure the successful implementation of the trails and open space concepts and policies. A major vision of the plan is to provide a continuous linear open space and trail along the riverfront in most of the corridor. The plan would encourage and coordinate the completion of missing links in established trail systems.

The plan proposes to provide up to 50% matching grants to state and local governments to acquire and develop open space. Operation of this open space would remain in state and local control.

(3) The National Park Service should take an active role in monitoring barge activities.

Response: The National Park Service would review applications for fleeting areas that require federal permits under the MNRRA legislative review authority. The National Park Service would also coordinate with the Corps of Engineers to ensure that the monitoring activity proposed in the plan is implemented.

A surface water management plan would be prepared and would be a priority for MNRRA plan implementation. The plan would provide guidance on issues such as suitable locations for additional barge fleeting and mooring areas and alternatives to expansion of existing facilities. The MNRRA plan proposes an evaluation of the potential of bottom disturbance, sediment resuspension, and shoreline disturbance from barge activities.

The interpretation section of the plan also addresses the need to understand commercial navigation activities and create a broader appreciation for the history of river traffic.

(4) A number of comments support improved water quality.

Response: Improvements in water quality have been a primary issue throughout this planning process; continued public support and the efforts of many agencies would

be necessary to implement the improvement policies contained in this plan. The plan was revised to clarify the approach to water quality issues and roles of the primary agencies involved.

The plan recognizes the Minnesota Pollution Control Agency as the lead agency in pollution prevention and control for the corridor. The National Park Service would work with the agency to monitor progress toward achieving water quality goals and meeting pollution prevention goals in the MNRRA corridor.

(5) There is concern that the plan would take away control of local land use decisions and create an unnecessary new layer of government.

Response: The plan does not propose to create another layer of government. The National Park Service does not have approval authority and all reviews would use existing review processes and time frames to the maximum extent practical.

Much of what is in the MNRRA plan was taken from the state guidelines and local critical area plans. Local governments would continue to control land uses and development in the corridor. Under the revised MNRRA plan, compliance with tier 2 land use management is voluntary and community plans and ordinances can be tailored to local conditions.

The last section in this volume includes copies of the individual letters from citizens on the June 1993 draft environmental impact statement for the comprehensive management plan. There are no individual printed responses from the National Park Service and commission to the letters printed here. Comments were, however, addressed in the formulation of the final plan.

AGENCY, ORGANIZATION, AND BUSINESS COMMENTS

Written comments from agencies, organizations, and business interests are reprinted in this volume along with the Mississippi River Coordinating Commission/National Park Service responses. Responses are only provided to comments questioning supporting information or environmental analysis, comments recommending actions beyond the range of alternatives in the draft plan, or comments requesting clarification of the draft. No response is given to comments simply expressing preference for the proposed action or any of the alternative actions. This volume includes the responses presented in the public input reports 1, 2, and 2A as modified by the commission. Those reports are available for reference at MNRRA headquarters in St. Paul. The responses to other comments that were not addressed in those reports are consistent with the revisions shown in the environmental impact statement and the general direction provided during the three commission meetings held to discuss the public input reports. Code numbers for comment letters and responses were kept consistent with earlier compilations of public comments, although several business letters were from organizations representing business interests and were therefore coded under the business category. The figures citing the number of written responses do not exactly match the total number of coded responses because in some cases multiple letters were received from one agency, organization, or company.

In many places throughout the document, the response "this is beyond the scope of the document" is given to the comments and recommendations. This response does not negate the importance of the comments nor does it mean that they will never be used. These comments could be incorporated into the preparation of follow-up implementation plans that will be prepared or facilitated by the National Park Service. These comments and recommendations are available in this final environmental impact statement and will also be maintained on file at MNRRA headquarters for future reference.

The purpose and need for the plan, the final comprehensive management plan and alternatives, the affected environment, environmental consequences, consultation and coordination, the list of preparers, and appendixes are contained in volume one.

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CITY OF NEWPORT
598 7th Avenue
Newport, Mn. 55055
(612) 459-5677
THE CITY OF NEWPORT IS AN EQUAL OPPORTUNITY EMPLOYER

Mayor Jerry Fritsch
Councilman Jeff Burgoyne
Councilman Tim Geraghty
Councilwoman Sharon Marko
Councilman Basil Loveland

City Administrator -
Gary C. Patterson

July 23,1993

JoAnn M. Kyral, Superintendent
Mississippi National River & Recreation Area
175 Fifth Street East
Suite 418, Box 41
St. Paul, Minnesota 55101-2901

RE: Newport response to DEIS.

1 Ms. Kyral:

After a review of the draft Comprehensive Management Plan and Environmental Impact Statement for the Mississippi National River and Recreation Area, the City of Newport has the following official comments for the record:

1 1. The City of Newport feels it is extremely important for local jurisdictions to retain local zoning control as the local jurisdictions are more accountable to the citizens of the particular community.

2 2. The City of Newport is against any increase in barge fleeting south of the Interstate 494 Bridge to the southern boundary of Newport as was previously established in Newport Resolution R-2-84, which was adopted in 1984. Newport is primarily a residential community and wants to preserve its residential property values as well as a more rural residential visual image. This comment regarding barge fleeting is in keeping with Newport's Comprehensive Plan, which was recently updated.

1. The summary and text portions of the document have been changed to address this concern and to further emphasize local control.

2. The draft plan stated that cities can continue to control barge fleeting, but clarifications have been added to the text in the final plan.

COMMENTS

PAGE TWO
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3 **3. The City of Newport would not be in favor of any type of recreational trail bordering commercial property in Newport due to the potential hazardous nature of the property regarding pedestrians.**

4 **4. The City of Newport would also be against recreational trails which would invade the privacy of Newport residents, however, the City would support public assess to the River in areas already under public control.**

If you have any further questions regarding, Newport's official comments, please call me at Newport City Hall.

Sincerely,

Gary C. Patterson
City Administrator

2 **cc: file**
Mayor and Council

RESPONSES

3. A statement has been added to the open space and trails section regarding rerouting of trails around hazardous areas. Proposed trails on the MNRRA plan maps were taken from existing city, county, and regional plans.

4. A trail routing concept drawing has been added to show how the river-long trail can be routed around single-family residences. Proposed trails on the MNRRA plan maps were taken from city, county, and regional plans.

CITY OF NEWPORT
598 7th Avenue
Newport, Mn. 55055
(612) 459-5677
THE CITY OF NEWPORT IS AN EQUAL OPPORTUNITY EMPLOYER

Mayor Jerry Fritsch
Councilman Jeff Burgoyne
Councilman Tim Geraghty
Councilwoman Sharon Marko
Councilman Basil Loveland

City Administrator -
Gary C. Patterson

August 23,1993

Ms. JoAnn Kyral, Superintendent
Mississippi National River & Recreation Area
National Park Service
175 Fifth Street East, Suite 418, Box 41
St. Paul, Minnesota 55101-2901

RE: Resolution 93-30 adopted by Newport City Council.

C3 Ms. Kyral:

Enclosed please find Resolution 93-30 adopted by the Newport City Council on August 19, 1993, which states that the City Council of the City of Newport, Minnesota is in opposition of the draft of the proposed Comprehensive Management Plan Environmental Impact Statement for the Mississippi National River and Recreation Area.

If you have any questions, please call me at 459-5677.

Sincerely,

Gary C. Patterson
City Administrator

enclosure

cc: file

RESOLUTION R-93-30

A RESOLUTION BY THE
CITY COUNCIL OF THE CITY OF NEWPORT, MINNESOTA
IN OPPOSITION TO THE DRAFT OF THE PROPOSED
COMPREHENSIVE MANAGEMENT PLAN ENVIRONMENTAL IMPACT STATEMENT
FOR THE MISSISSIPPI NATIONAL RIVER AND RECREATION AREA

WHEREAS, the City of Newport, Washington County, Minnesota, by and through its duly elected City Council, in response to the request for comments to the proposed Comprehensive Management Plan and Environmental Impact Statement of the Mississippi National River and Recreation Area, Minnesota, does hereby adopt this resolution as its formal response and finds:

The City of Newport, Minnesota, is a municipal corporation and municipality in continuous existence at its current location on the Mississippi River for over 100 years.

Located within the Twin City metropolitan area of Minnesota, the City of Newport is a unique community of fewer than 5,000 residents with a wide variety of housing types and citizen income levels.

The presence of the Mississippi River bordering the City is, from the perspective of the City, a precious resource critical to the quality of life of its citizens.

In addition to expensive bluffland homes being constructed overlooking the City and the river, subject to very stringent zoning requirements imposed by the City to preserve the character of the bluffland area in as close as possible to its original state, the City of Newport has obtained ownership and control of an 80-acre bluffland park, which the City is currently planning to utilize in conjunction with local education authorities as a significant educational resource, as well as a means of preserving original Mississippi bluffland vegetation and fauna.

Immediately next to the river, located within the Newport city limits, is one of the oldest residential neighborhoods located directly on the Mississippi River within the river corridor.

The City of Newport, unlike many other communities in the metropolitan area, has a very long history and a well-developed historical sense of itself and the need to preserve its character as a city in the interests of its citizens throughout the City.

That the City of Newport believes much of its history and character are defined by the residential neighborhoods immediately adjacent to and in the lower part of the City.

The City of Newport has gone through great lengths through the years by way of its zoning laws and ordinances to preserve the unique character of the residential neighborhood located immediately along the Mississippi River.

That in order to preserve this critical element of the community, in addition to its own zoning code enforcement, the City of Newport has engaged in active efforts to fend off commercial encroachments, particularly in the form of barge fleeting, as well as nuisances permitted by other municipalities along the riverway that had an immediate and detrimental impact on the quality of life of the Newport citizens living on or near the river.

The experience of the City of Newport over the years has been, however, that outside agencies have generally been willing to overlook the community needs of a relatively small city like Newport and have been prepared to advance the interests of commercial enterprises and groups wishing to use the waterway in a manner detrimental to a residential community like Newport on the river.

The City of Newport, through its Council members and support staff, have been very carefully scrutinizing both the legislation creating (and implementation of) the so-called Mississippi National River and Recreation Area.

In particular, when Representative Vento first proposed the legislation, the City Council directed its legal counsel and staff to do a thorough analysis of the proposed legislation and its possible impact on the City of Newport and, in particular, the City's efforts to preserve the unique character of its riverfront.

At that time, counsel for the City raised a number of concerns regarding the underlying proposed legislation that would have permitted the managing authority to supersede zoning of municipalities on the river, such as Newport, and potentially and effectively negate a century of efforts by the City to preserve its riverfront character.

Notwithstanding the express language of the underlying implementing legislation, City officials of Newport were assured that it was not intended to create a "super-agency" that could adopt its own zoning code and force its provisions upon municipalities and citizens living on the river and would not weaken municipal zoning code protections currently in place.

When, therefore, the City was given the opportunity to review the draft of the Comprehensive Management Plan Environmental Impact Statement provided and make comment regarding the same, it was with shock and anger that Council members determined that, indeed, very little protection is afforded to cities such as the City of Newport, Minnesota, if it were to choose through zoning codes to provide for provisions unique to its riverfront residential area if those provisions in any way conflicted with the overall plan.

Moreover, to add insult to injury, a review of the plan shows that expenditures in implementing the plan's provisions, including land purchases, provisions are to be made by municipalities like Newport and not by any federal authority or other state authority.

In particular, the City notes that an apparent bike or pathway is provided along the riverfront through the City of Newport on what is currently private land. The mere provision of such a bikeway on private land creates, in the City's view, an immediate potential for inverse condemnation litigation and, given the provisions of the law and proposed plan, the full responsibility for any diminution of property value as a result of the implementation of the overall plan would be borne by the participating municipality, in this case, the City of Newport.

The City of Newport in no way can afford, nor does it intend to acquiesce to the imposition of, any requirement that it purchase corridors along the river within its boundaries.

Moreover, the provisions of the plan clearly provide for implementation of an overall zoning plan by the Metropolitan Council and other authorities and does not permit a city, such as Newport, with unique needs to override any such plan with, if necessary, more stringent provisions to protect the unique qualities of the community on the river.

Indeed, the plan requires consideration of commercial interests in utilization of the river corridor, but nowhere indicates that residential usage is in any way different from or superior to any such other "interests" on the riverway. The City of Newport takes the strongest possible exception to what it views as a fundamentally flawed failure of both policy and perception in the plan.

While the City is aware that the plan purports not to affect the use and enjoyment of private land along the river, its practical effect would be to impose Metropolitan Council and DNR zoning regulations concerning the plan upon the City, and the plan expressly states an intention to provide for state legislation that would force municipalities within the corridor to conform their zoning codes to the plan, potentially in a manner adverse to the interest of Newport and its citizens.

The provision in the plan that would require cities not to permit reconstruction of residences or structures other than on an existing footprint would be an additional restriction on the use of the land located on the riverfront that would have an immediate negative impact on property values facing the river and would, once again, expose the City of Newport to potential inverse condemnation liability.

Careful, thorough review of the proposed plan clearly indicates that its adoption would have a significant, negative impact on the City and its ability to protect both that character developed through its history, as well as the interests of its citizens living on or near the Mississippi River.

Upon very careful review and thorough analysis, the City Council of Newport, Minnesota, is not merely opposed, but strongly opposed to the implementation of the plan and believes that any effort in defense of the plan to portray it as being a tool to assist the City in its efforts to maintain its character and interests of its citizens is inaccurate, false and a sham.

NOW, THEREFORE, BE IT RESOLVED, the City of Newport, Minnesota, through its City Council acting on the ___ day of August, 1993, states in the strongest possible terms its opposition to the draft Comprehensive Management Plan Environment Impact Statement presented to it and dated June, 1993, by the Mississippi Coordinating Commission and National Park Service.

BE IT FURTHER RESOLVED, that the City of Newport, acting through its City Council, does further state and resolve that it will remain in opposition to any purported plan for the Mississippi River corridor that does not allow the City full discretion through its zoning code to protect the rights and interests of its residential neighborhoods and citizens living on or near the Mississippi River (which, in the case of Newport, Minnesota, is virtually all of its residents).

5

BE IT FURTHER RESOLVED, that the City Manager is directed to forward this resolution to all appropriate authorities involved with the review of this plan, as well as any and all other affected municipalities and elected officials.

Adopted this 19th day of August, 1993.

CITY OF NEWPORT

By Gerald Fritsch
Gerald Fritsch, Mayor

(ATTEST)

Gary Patterson
Gary Patterson, City Administrator

5. The land use management framework has been revised to reflect this concern and further emphasize local control of land use and the zoning code subject to existing state and regional land use management authorities.

COMMENTS

RESPONSES

DAKOTA COUNTY

DAKOTA COUNTY GOVERNMENT CENTER

OFFICE OF THE COUNTY BOARD
(612) 438-4418
1560 HWY. 55 - HASTINGS, MINNESOTA 55033

July 28, 1993

Ms. JoAnn Kyral, Superintendent
Mississippi National River & Recreation Area
National Park Service
175 Fifth St. East, Suite 418, Box 41
St. Paul, MN 55101-2901

Dear Ms. Kyral:

Since 1990, Dakota County has monitored the National Park Service (NPS) in their preparation of a planning and management strategy for the Mississippi National River and Recreational Area (MNRRA). This particular project has the potential of having a major impact on Dakota County due to the fact that the proposed MNRRA includes 72 miles of the Mississippi River and four miles of the Minnesota River; of which over 40 percent borders Dakota County.

In September 1992, the Board of Commissioners reviewed the alternative management concepts then under consideration by the Mississippi Coordinating Commission. The Board expressed three concerns regarding the adoption of a land use management concept: 1) it should not add an additional layer of administration to the existing system; 2) the land use management system selected should not usurp local controls; and 3) the plan should assure a strong emphasis on environmental protection. At a June 1, 1993 meeting, the Board indicated interest in the financing of the projects within the corridor. With these considerations in mind, the Dakota County Board of Commissioners took position in the attached resolution with respect to the MNRRA Management Comprehensive Plan Environmental Impact Statement.

In summary, Dakota County supports the principles embodied in the MNRRA proposal. However, the County does have some reservations regarding the administration and oversight of local governments through this plan.

The proposed plan provides for minimal ownership of land within the corridor by the NPS and for "extensive partnerships" in management. These concepts are consistent with the County Board's previous interests. However, the proposed plan also provides that the NPS is to develop land use monitoring options in conjunction with the Metropolitan Council and the Department of Natural Resources (DNR). The plan would assign a major role to the Metropolitan Council and DNR in the monitoring and development of the river corridor.

Dakota County opposes the addition of another layer of administration in the existing land management system through the oversight assigned to the Metropolitan Council. We also are concerned about the resources of the Metropolitan Council to carry out the newly assigned tasks. 1

AN EQUAL OPPORTUNITY EMPLOYER

8

1. The National Park Service (NPS) would request funding to implement this proposal and work with the Metropolitan Council to ensure resources are available to implement the plan.

Dakota County also supports the concepts of funding of parks, trails and interpretive facilities through the NPS and encourages Congress to appropriate funds to allow completion of projects such as the Mississippi Riverfront Regional Trail, the Soo Line Corridor Regional Trail, and acquisition and development of the Spring Lake Regional Park Reserve in addition to projects included in the proposed MNRRA Plan.

2 We are concerned that the proposed plan is non-specific. It appears to attempt to strike a compromise between conflicting corridor uses, but provides few details on how these compromises will be reached. The plan will be arduous to implement because it is not sharply focused. The lack of focus also makes it difficult to determine if the Board's interest in a strong emphasis on environmental protection and improvement within the corridor will be obtained. More specific implementation measures are needed. We strongly urge the NPS to further define and develop more specific implementation measures for this plan in order to assure strong emphasis on environmental protection and improvement. The Board's resolution includes a specific example with respect to how existing programs in the corridor will be maintained.

Finally, Dakota County continues to urge the National Park Service to appoint Dakota County representatives to the Mississippi River Coordinating Commission.

If you have any questions or concerns regarding our position, please feel free to contact Jack Ditmore, Deputy Director of Physical Development, at (612) 891-7007.

Sincerely,

Patrice Bataglia

Patrice Bataglia, Vice Chair
Dakota County Board of Commissioners

PB/cyk
Attachment
c: Dakota County Commissioners
Brandt Richardson, County Administrator
Louis J. Breimhurst, Director, Physical Development
Arne Carlson, Governor
Mayors and Township Chairs of Cities and
Townships on the River
Bob Orth, Executive Director, MICA

N:\MNRRA

6

2. The plan is intended to be conceptual, providing a policy framework for more detailed planning and decision making, and it should not be site specific or highly detailed. The plan was amended to add some specifics for the many issues identified in public comments. Text was added to further explain that this is a comprehensive plan that is not intended to provide all the details for managing the corridor. Much of this detail would require more work with the partners, including elements that need updating more frequently than is feasible with a comprehensive plan.

BOARD OF COUNTY COMMISSIONERS
DAKOTA COUNTY, MINNESOTA

DATE July 27, 1993 RESOLUTION NO. _____

Motion by Commissioner Maher Seconded by Commissioner Turner

WHEREAS, since 1990, Dakota County has monitored National Park Service work in the preparation of a planning and management strategy for the Mississippi National River and Recreation Area (MNRRA); and

WHEREAS, the Mississippi National River and Recreation Area program has the potential to have a major impact on Dakota County; and

WHEREAS, the National Park Service has recently prepared a draft Comprehensive Management Plan/Environmental Impact Statement for the Mississippi National River and Recreation Area in Minnesota; and

WHEREAS, Dakota County has studied and reviewed said document.

NOW, THEREFORE, BE IT RESOLVED, That the Dakota County Board of Commissioners hereby supports principles embodied in the Mississippi National River and Recreational Area Plan, but opposes the addition of an additional layer of administration in the existing land management system through the oversight assigned to the Metropolitan Council; and

BE IT FURTHER RESOLVED, That Dakota County supports the concept of funding parks, trails and interpretive facilities as outlined in the MNRRA Plan through the National Park Service and strongly encourages Congress to appropriate funds to allow completion of projects such as the Mississippi Riverfront Regional Trail, the Soo Line Corridor Regional Trail, and acquisition and development in Spring Lake Regional Park Reserve; and

	YES		NO
Harris	X	Harris	
Maher	X	Maher	
Bataglia	X	Bataglia	
Richards	X	Richards	
Turner	X	Turner	
Jensen	X	Jensen	
Loeding	X	Loeding	

State of Minnesota
County of Dakota

I, Joan L. Kendall, Clerk to the Board of the County of Dakota, State of Minnesota, do hereby certify that I have compared the foregoing copy of a resolution with the original minutes of the proceedings of the Board of County Commissioners, Dakota County, Minnesota, at their session held on the 27th day of July 19 93 now on file in the County Administration Department, and have found the same to be a true and correct copy thereof.

Witness my hand and official seal of Dakota County this 28th day of July, 1993

Joan L. Kendall
Clerk to the Board

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dE IT FURTHER RESOLVED, That Dakota County urges the National Park Service to further define and develop more specific implementation measures for this plan in order to assure a plan with a strong emphasis on environmental protection and improvement; and

BE IT FURTHER RESOLVED, That Dakota County urges the National Park Service to require that statistically significant scientific data be presented to support and demonstrate the rationale for any proposal to limit existing management programs in the river corridor based on arguments of a significant adverse environmental impact; and

BE IT FURTHER RESOLVED, That the Dakota County Board of Commissioners reiterates concerns expressed in letters to Interior Secretary Bruce Babbitt and Governor Arne Carlson with respect to the County's continued lack of representation on the Mississippi River Coordinating Commission; and

BE IT FURTHER RESOLVED, That the Chair of the Dakota County Board of Commissioners or another Commissioner or staff person be authorized to present the position of the County Board contained in this Resolution at the public hearing before the Mississippi Coordinating Commission; and

BE IT FURTHER RESOLVED, That the National Park Service, the MNRRA Commission, and other affected units of government be notified of this Dakota County Board position; and

. IT FURTHER RESOLVED, That staff keep the County Board apprised of further developments in the river corridor planning process.

11

SANDRA HILARY
COMMISSIONER

612-348-3062
FAX-348-8701

BOARD OF HENNEPIN COUNTY COMMISSIONERS
A-2400 GOVERNMENT CENTER
MINNEAPOLIS, MINNESOTA 55487-0240

July 28, 1993
United States Department of the Interior
National Park Service
Mississippi National River and Recreation Area
175 5th St. E., Suite 418, Box 41
St. Paul, MN 55101-2901

To Whom it May Concern:

I would like to submit this letter into your records of public comment regarding the draft plan DEIS for the Mississippi National River and Recreation Area.

1 I would specifically like to comment on the Metropolitan Mosquito Control District's biting gnant control program. I would urge you to support the continuation of this program.

The MMCD Black Fly Control Program continuously monitors larvai and adult populations. The product used is called BTI which is actually a common soil bacteria that is highly effective in controlling black flies. BTI is considered to be one of the safest insect control agents ever developed. In addition, studies have shown that BTI does not have any measurable impact on the aquatic food chain.

Thank you for receiving these comments.

Sincerely,

Sandra Hilary

Sandra Hilary
Hennepin County Commissioner
District Two
SH:kw

PRINTED ON RECYCLED PAPER

12

1. The National Park Service does not have the authority to prevent use of pest management actions, such as biological or chemical control techniques, outside NPS-owned lands. Decisions on pest management practices outside NPS lands would continue to be made by local communities.

METROPOLITAN MOSQUITO CONTROL DISTRICT
2099 UNIVERSITY AVENUE W., ST. PAUL, MN 55104
Phone 612-643-8360 Fax 612-645-3246

FAX COMMUNICATION

DATE: July 23, 1993
TO: MMCD Commissioners representing Anoka, Hennepin, Ramsey and Washington Counties
FROM: Bob Sjogren
RE: Testifying at Mississippi National River and Recreation Area (MNRRA) hearings July 26-29

- Meetings to date with MNRRA staff requesting that the MMCD biting gnat control program be included in the MNRRA Draft Comprehensive Management Plan - EIS have been unsuccessful in incorporating biting gnat control. The rationale has been that the MNRRA Commission did not include it in their scoping document.
- The MMCD has controlled biting gnats in metro rivers and streams since 1985, when they became a severe annoyance problem (see following information). The Mississippi River from Dayton to the Highway 694 bridge is particularly productive, producing gnats which disperse across the northern metro region causing problems in local communities.
- As the MNRRA Comprehensive Management Plan will determine which activities will be permitted along the river corridor, inclusion of gnat control treatments is necessary to continue biting gnat control services.
- Extensive scientific literature and local environmental impact research has confirmed the safety of gnat control measures. Control of pest and disease insect species is a component of enhanced enjoyment of public outdoor recreation activities in the area identified in the findings and purposes of MNRRA [Sec. 701(a), Title VII, Mississippi River Recreation Area Act].
- Following is a list of scheduled MNRRA hearing dates and locations. I plan to meet with MNRRA Commissioners and testify next week at the Anoka Technical College on July 27.
- **MMCD Commissioners from Hennepin, Anoka, Ramsey and Washington Counties are encouraged to testify or submit a letter supporting the continuation of biting gnat control measures until such time as scientific information is provided which demonstrates statistically significant adverse environmental impact related to biting gnat control measures.**
- I am forwarding similar information to north metro community leaders informing them of their need to testify at the MNRRA hearings if they want biting gnat control to continue.

c: Commissioner Loeding

13

Answers to Some Commonly Asked Questions

Why do black flies bite me and not other people?
Some people simply are just more "appealing". Possible factors may involve your natural odors, skin texture, body temperature, or your behavior.

Why are black flies so bothersome some days and not other days?
Black flies are sensitive to weather conditions. They are most active on cloudy, humid days with low wind.

Why does the District only control larval black flies and not adults?
Adult control would be economically and logistically impractical because adult black flies rest high in trees. Treating local areas with a "fogger" will provide only minimal relief and is not recommend for black flies.

Can I do anything to reduce the black fly populations on my property?
No, black flies breed only in running water and special permits would be required for ANY action you might want to take. We recommend that you contact the District to have it checked out by a knowledgeable expert.

Why is Bti so specific to black flies?
Black flies must ingest the *Bti* where it is activated by the unique chemistry of their guts. Only black flies and their close insect relatives (including mosquitoes) have this unique gut chemistry. Most other insects, fish, birds, and mammals (including humans) do not have the right stomach chemistry and thus are not affected.

If You Want More Information Contact:

Metropolitan Mosquito Control District
Black Fly Control Program
2099 University Avenue
St Paul, MN 55104
P (612)-645-9149

Metropolitan Mosquito Control District
2099 University Avenue
St. Paul, MN 55104

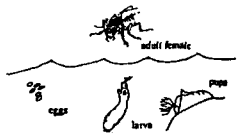
Affirmative Action Employer

TDD use Minnesota Relay Service.
Available in alternate formats.



Metropolitan Mosquito Control District

Black Fly
-Biting Gnat-



Control Program

What Are Black Flies?

Black flies are commonly called biting gnats. They are closely related to mosquitoes. Female black flies suck blood in order to develop eggs. Males do not bite but feed on plant nectars. Female black flies range in size from 1/8 to 1/4 inch.

The Black Fly Bite

The painful, itchy bite of a black fly is characterized by a reddened weal with a wound in the center. The wound is created by the female when she cuts a hole in the skin to suck the blood that seeps into it. In the process she injects anticoagulants, a pain killer (to remain stealthy!) and some toxins. The pain and swelling of the bite are due to an allergic reaction to these foreign proteins and a response to the toxins. Black flies do not transmit any diseases to humans in Minnesota.

Black Fly Life Cycle

Shortly after emergence from their larval breeding site, adult male and female black flies mate. The female then must locate a blood-meal to complete development of her eggs. Once a blood-meal is obtained, egg development is completed in 2 - 4 days. The female then locates a river or stream in which to lay them. Depending on the species, this will range from the tiniest spring to the Mississippi River.

Female black flies generally ambush their victims from tree-top perches situated near the edge of an open area. They are day-active, with biting peaks in the morning and early evening. Females live from one to three weeks, depending on the species and weather conditions. They survive best in cool, wet weather. Studies done by the MMCD indicate that the majority of black flies in the region lay only one egg batch.

When the eggs hatch, the tiny larvae begin their life in the stream. They eat by filtering food from the running water with specially adapted mouth parts that resemble grass rakes. They grow to about 1/4 inch long when fully developed. This takes from 10 days to several months, depending on the species and water temperature. They then enter the pupal stage where transformation to the adult stage occurs. The adult emerges from its pupal case by riding a bubble of air to the surface, much like what happens when you pull a kick ball under water an then let it go!

The Black Flies of the Twin Cities Area

There are 14 black fly species within the Twin Cities metropolitan area. Of these, 4 species are considered pests of humans and the District has a program to control them. The pest species (in order of abundance) and their preferred rivers are:

1. *Simulium luggeri* - Mississippi and Rum
2. *Simulium meridionale* - Minnesota and Crow
3. *Simulium johannseni* - Minnesota and Crow
4. *Simulium venustum*- most small streams

The MMCD Black Fly Control Program

The District has permits from the Minnesota Department of Natural Resources to manage black flies by applying a biologically produced insecticide called *Bti* to the rivers where they breed. Larvae are only treated when the density exceeds a pre-determined threshold. The program includes:

- Continuous larval population monitoring
- Application of *Bti* when the treatment threshold is exceeded
- Monitoring the effectiveness of *Bti*
- Monitoring adult populations
- Monitoring non-target organisms

What is *Bti* ?

Bti stands for *Bacillus thuringiensis israelensis*. *Bti* is a special formulation of a common soil bacteria that is highly effective in controlling black flies (and mosquitoes!). It is *not* toxic to other insects, except a few close relatives of black flies. Due to its extreme specificity, *Bti* is considered to be one of the safest insect control agents ever developed.

What About the Environment?

Despite *Bti*'s specificity, questions have arisen about how *Bti* affects the aquatic food chain. Hundreds of scientific studies done throughout the world have shown no ill effects. The District, as required by its permits from the Minnesota Department of Natural Resources, has been conducting extensive studies on the toxicity and food chain effects of *Bti* in both small streams and large rivers within the District for six years. The aspects of the studies that have been completed show that *Bti* does not have any measurable impact on the aquatic food chain.

What You Can Do

No matter how effective the District's black fly control program is, there always will be some gnats around. Here are some suggestions to help reduce annoyance:

- Wear light colors, especially whites and tans; the shinier the better! Wear a light colored hat.
- Avoid dark colors, especially red, black, or blue.
- Use insect repellent. Apply it to your neck, behind your ears, under your chin, around your wrists, and around your ankles.
- Wear long pants and long-sleeved shirts. Tuck your pants into your socks.
- If you are bitten, avoid scratching. Commercial products to reduce itching can help.
- If you are highly sensitive to bites, see a doctor.

CITY OF FRIDLEY

)LEY MUNICIPAL CENTER • 6431 UNIVERSITY AVE. N.E. FRIDLEY, MN 55432 • (612) 571-3450 • FAX (612) 571-12

September 9, 1993

Superintendent
Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418
Box 41
St. Paul, MN 55101

Dear Superintendent:

Enclosed is a copy of testimony I presented on behalf of the Fridley City Council at a public hearing on the Mississippi National River and Recreation Area Comprehensive Management Plan held on July 27, 1993, at Anoka Technical College, 1355 West Main Street, Anoka, Minnesota.

My remarks have bearing on the variance policy on page 29 of the June 1993 Draft Comprehensive Management Plan Environmental Impact Statement. I urge you to amend the last paragraph on page 29 by the addition of a sentence so that it reads as follows:

> Variances would be handled through the established local variance procedure. The results of variance hearings ~~would be reviewed by the Department of Natural Resources.~~ Reversal of a residential land use variance granted by a city would require a decision by the Federal District Court that the locally approved variance was in conflict with the federal statute, Public Law 100-696.

1

The addition of this amendment is crucial to the maintenance of a "level playing field." Without such an amendment individual homeowners would face enormous costs and time consuming procedures if they had to appeal an adverse variance ruling by either the

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1. The Minnesota Department of Natural Resources (DNR) does not have the power to veto a local variance decision, and court action is its only recourse.

Letter to Superintendent
Mississippi National River
and Recreation Area
September 9, 1993
Page Two

Minnesota Department of Natural Resources or the U. S. Department of the Interior.

Sincerely,

William W. Burns

William W. Burns
City Manager

cc: William J. Nee, Mayor
Nancy J. Jorgenson, Councilmember-at-Large
Steven E. Billings, Councilmember, Ward I
Dennis L. Schneider, Councilmember, Ward II
Edward J. Fitzpatrick, Councilmember, Ward III
Senator David Durenburger
Senator Paul Wellstone
Representative Rod Grams
Vern Peterson, Executive Director, Association of Metropolitan Municipalities
Ann Higgins, Federal Liaison, League of Minnesota Cities

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CITY OF FRIDLEY
STATEMENT
MNRRA MISSISSIPPI RIVER PROPOSAL

The City of Fridley wishes to enter into the record its comments on the proposed management plan for the Mississippi River corridor in Fridley.

Our thoughts and concerns are as follows:

Residential Legitimacy

In general, we do not feel that the plan adequately recognizes the interests of residential property owners. In Fridley, the Mississippi River shoreline is fully developed. Moreover, much of Fridley's extensive Mississippi River shoreline is developed residentially. Therefore, it is of deep concern to the City of Fridley that the fundamental legitimacy of residential uses seems to have received only grudging recognition in the proposed management plan. In contrast, the plan gives special recognition to several other areas:

1. Preservation and enhancement of environmental values;
2. Enhancement of outdoor recreational opportunities;
3. Conservation and protection of scenic, historical, cultural, natural and scientific values in the area; and,
4. Commercial uses of the area.

18

While we realize that these concerns have been expressed in Federal legislation and that the plan must deal with the above concerns, we believe that the plan should also provide explicit recognition for residential uses. As the plan now stands, it gives the impression that residential uses are essentially undesirable but unavoidable.

2

2. Additional recognition of residential use was added to the plan. Local governments would continue to zone land along the river for residential uses. The plan states that residential use is desirable in the corridor, including the riverfront area. This would be balanced, however, by the need to provide open space and recreational opportunities for all residents. The riverfront policy was revised to eliminate the list of encouraged and discouraged uses. The text now also states that the National Park Service has no plan to acquire residential property.

Variance

Since almost all of the riverfront residential property is owned by individuals rather than corporate/business interests, we are also deeply concerned with the fact that a successful appeal of an adverse variance ruling by either the Department of Natural Resources or the Department of the Interior will be financially unfeasible for residential property owners.

While it is relatively easy, inexpensive and practical for any property owner to appeal an adverse ruling of the City, it appears that an appeal of an adverse ruling by either the Department of Natural Resources or the Department of the Interior will be nearly impossible under the guidelines that are presently expressed in the plan.

Given all the powers of government in these situations, it seems little to ask that individual homeowners be given an opportunity to protect their interests on a "level playing field." In this vein, we propose that the land use enforcement powers of the Department of Natural Resources be amended in a manner that places the "burden of proof" for denial of locally approved residential zoning variances on the Department of Natural Resources, rather than the property owner.

3 In the event the Department wishes to reverse a residential land use variance granted by the City, it should be required to successfully petition the Federal District Court. Such petitions should only be granted if the locally approved variance is in conflict with the Federal statute (Public Law 100-696) without reference to provisions of the MNRRA plan itself.

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3. See response to comment G-4-1.

As a practical matter, we do not believe that this kind of accommodation should be onerous or present any real obstruction to the reasonable use of power contemplated by the Federal statute. It simply provides individual citizens with the "level playing field" that so many people are seeking these days.

We thank you for the opportunity to air our comments.

20

CITY OF FRIDLEY

WILLIAM J. NEE
MAYOR

FRIDLEY MUNICIPAL CENTER • 6431 UNIVERSITY AVE. N.E. FRIDLEY, MN 55432 • (612) 571-3450 • FAX (612) 571-1287

October 6, 1993

Ms. JoAnn M. Kyral
Superintendent
Mississippi National River
and Recreation Area
175 East Fifth Street, Suite 418
Box 41
St. Paul, MN 55101

Dear JoAnn:

Because of my membership on the Mississippi River Coordinating Commission, I have refrained from participating in the current round of "public comment." However, I do also wear another "hat" as a representative of Fridley residents, and so I hope the following comments can be received as "public comment."

Since the hearing held in Anoka last month, I have had a number of Fridley riverfront homeowners contact me expressing a great deal of anxiety and lack of confidence concerning the security of their riverfront investment.

I have to say they sense that the positive assurances are not credible because of "exceptions" they perceive in other parts of the document...or sometimes in the same paragraph or sentence, such as:

> "Structures that do not meet setback and height standards could be rebuilt on the same footprint if destroyed by fire or natural disaster unless prohibited by federal, state or local plans."
>
> Page 20, emphasis added.

4 No wonder they suspect MNRRA duplicity. This says "yes" and "no" in the same sentence!

For MNRRA's purposes, why couldn't the sentence read:

> "Nothing in this plan would prohibit the rebuilding of structures destroyed by fire or natural disaster on the previously existing footprint and to the previously existing height and configuration."

RESIDENCE • 219 LOGAN PARKWAY N.E. FRIDLEY, MINNESOTA 55432 • PHONE (612) 571-7595

21

4. The text was clarified to reflect this comment.

This would say (I hope) that MNRRA permit review would not undertake the enforcement of some other law.

This is just one of a number of provisions in the "Plan" that is causing mistrust and ferment. Let me give you another example. A homeowner owns some banks in Minneapolis and Anoka County. She has lived on the river for about thirty years. In that time, she has invested well over $1 million in the main residence, support buildings, and landscaping. I suspect that there would be a number of non-conforming situations if the standards in the MNRRA plan (or perhaps the Critical Areas guidelines) were strictly enforced, and the variance criteria described on Page 29 applied literally.

The homeowner asked some reasonable "what if" questions, to which I had to answer, "You could have some trouble." That is why there is "ferment" up and down this part of the river.

5 I should add that this is not an unfounded "fear" on the homeowner's part. She believes that the very existence of this proposed plan...if adopted as-is...will substantially devalue her property. It very clearly adds more onerous regulatory oversight, and moves the final decision authority to an "unaccountable" office in Washington, D.C.

The homeowner has already experienced a comparable problem when the Critical Areas Act was implemented. One of her banks (in Northeast Minneapolis) had several large loans secured by riverfront property on the east bank in Minneapolis, including a lumber company that had developed at that location over a long time. I do not know all the details, but the bank determined that the application of Critical Areas seriously devalued the property securing their loan. As I understand it, an accommodation was made. But she knows what she is talking about...and other Fridley riverfront owners are listening.

6 Another concern is the overlay of an additional layer of government. I think that this issue has surfaced without exception from all those who have contacted me. Trying to minimize the anticipated intrusive effects only convinces the people who have studied the "Draft Plan" that confidence in the proposal cannot be justified.

Clearly, there is another layer of government being added which seeks arbitrary powers that could be abused, and couched in a context that makes appeal extremely difficult, if not impossible.

As one local public official said, "Where are the rights reserved to the people?"

Unfortunately, the problem starts with the federal statute itself. Section 701(a)(5) provides for a "COOPERATIVE" relationship with local units, but Section 704(b)(1) and 705(d) says local units of government must do it MNRRA's way, "or else"!

When we are starting from that foundation, it is a little difficult to maintain credibility using such concepts as "cooperative," "partnerships," "assist local units of government," etc., when anybody who reads the plan can see the duplicity of the pretense that this is not a Washington "takeover."

5. The final plan stresses local control.

6. The plan does not propose to create another layer of government. The National Park Service does not have approval authority and all reviews will use existing review processes to the maximum extent practical.

Since MNRRA's primary interests are not at stake north of the Camden bridge, I hope we can avoid an unnecessary confrontation. Quite frankly, I do not have any specific suggestions for dealing with the problem. I do think some provisions or gratuitous comments might be softened or eliminated without damaging the document.

7 I do think it would be constructive to devise a way to shift the "burden of proof" on variance and permit appeals to the Secretary of the Interior instead of the petitioner. Over the years, I have found that the fact that the city has the burden of proof on denial of special use permits tends to prevent arbitrary/capricious decisions by Minnesota cities. I do not think a similar provision would seriously prevent MNRRA from achieving legitimate goals.

Anyway, these are some of the public concerns that have developed in this (upstream) stretch of the river. I would be interested in any thoughts the National Park Service or other commissioners might have.

Sincerely,

William J. Nee

William J. Nee
Mayor, City of Fridley

WJN:rsc

c: Representative Rod Grams
Representative Wayne Simoneau
Senator Gene Merriam
Senator William Luther
Senator Steven Novak
Representative Alice Johnson
Representative Charlie Weaver
Senator Donald Betzold
Mayor Peter Beberg, City of Anoka
Mayor William Thompson, City of Coon Rapids
Mayor Todd Paulson, City of Brooklyn Center
Mayor Jesse Ventura, City of Brooklyn Park
Anoka County Commissioner Jim Kordiak
Anoka County Commissioner David McCauley
Anoka County Commissioner Paul McCarron
Anoka County Commissioner Dan Erhart

23

7. The plan does not propose any appeals to the secretary of the interior.

City of ANOKA

August 26, 1993

Ms. JoAnn Kyral
Superintendent
National Park Service
MISSISSIPPI NATIONAL RIVER AND
RECREATION AREA
175 East Fifth Street, Suite 418
St. Paul, MN 55101

Dear Ms. Kyral:

This letter is in response to your request to Mayor Beberg at the July *public hearing to relate Anoka's concerns to specific parts of the* draft comprehensive plan. Our City Planner Melinda Coleman has reviewed the document and I have enclosed her memorandum to me summarizing some of our specific concerns.

1 In general, the city is concerned about another federally unfunded mandate that requires scarce city dollars and staff time to implement with little or no opportunity for reimbursement for our costs. The Anoka City Council has been on record for a long time in opposition to federal and state mandates that carry no source of funding the implementation of the particular law or regulation.

2 Second, the plan provides no specifics on residential variance *guidelines and procedures, which would be of significant concern to* Anoka homeowners. While I recognize this is perhaps not a goal of the plan, it does make it difficult to support the plan, since we have no idea how it will be implemented by regional and state agencies.

3 Third, there is little detail in the plan on how existing city redevelopment plans and tourism activities would be affected as a result of the implementation of the draft plan. The city has a substantial investment in the long-range redevelopment of the downtown flood plain and Peninsula Point area that may be affected by subsequent regulations based on the concept plan from the Metropolitan Council and other agencies. In addition, our interpretation of the plan suggests it would be possible that river boat activities and the

2015 FIRST AVE. NO. • ANOKA, MINNESOTA 55303-2270 • PHONE (612) 421-6630
— AN EQUAL OPPORTUNITY EMPLOYER —

1. The final plan was revised to more clearly state that federal funds would be requested for local communities to implement the plan.

2. Variance guidelines would be determined by individual communities and variance procedures would be consistent with existing state law. The text has been modified to stress this.

3. The provisions included in the MNRRA plan do not substantially differ from local redevelopment plans if those plans were prepared in accord with the state critical areas guidelines. Much of what is in the MNRRA plan was taken from the state guidelines and local critical areas plans. The draft plan addressed tourism. Tourism would increase, but it is not possible to quantify how much. Increased access and safety, an improved appearance, more visitor facilities, and visitor orientation and awareness would serve to increase tourism to corridor communities. The document includes these impacts and recognizes opportunities for development of tourism-related businesses in the corridor that could contribute to the local economy.

Minnesota Smallmouth Bass Championship, which is an annual "catch-and-release" fishing tournament on the river, would no longer be allowable. More definition of how the plan would work is needed; that is, specific examples of activities that would not meet guidelines is essential, so people understand the affect of the plan. 4

Finally, we remain concerned about the plan's seeming delegation of decision-making authority over local plans to the Metropolitan Council, as has been suggested at public meetings, which may be outside the authority of the Metropolitan Council. 5

These are just a few of the areas in the plan that are nonspecific or unclear, but these represent the salient points of concern for the City of Anoka regarding the plan.

If you have further questions, please do not hesitate to contact me. We certainly appreciate the many opportunities over the past several months to comment on the plan provided by the commission.

On behalf of the Anoka City Council,

CITY OF ANOKA

Mark Nagel

Mark Nagel
City Manager

Enclosure

(dy\WP\mrs)

25

4. Additional clarifying language was added to the plan to explain how it would be implemented. Some guidance is provided in appendix C but much of this would be worked out in follow-up coordination with the Metropolitan Council, Department of Natural Resources, and the corridor communities.

5. Local control would be retained. Metropolitan Council actions would not exceed their existing authority. The plan was amended to clarify this.

City of ANOKA

August 16, 1993

Mr. Doug Bryant
Superintendent
HENNEPIN PARKS
12615 County Road 9
Plymouth, Minnesota 55441-1248

Dear Mr. Bryant:

First, thank you for sponsoring the recent meeting to review the possible alternatives for the Coon Rapids dam. It was very informative and we hope you will keep us updated on the progress of the study.

At its joint meeting on Monday, July 12, 1993, the City Councils of Anoka and Champlin met to discuss this issue and adopted the attached resolution regarding the Coon Rapids dam. Both city councils voted unanimously to oppose the selection of any alternative that results in the removal of the Coon Rapids dam for the reasons outlined in the joint resolution. In addition, the councils ask that the Minnesota Department of Natural Resources and the state legislature work together with the Suburban Hennepin Regional Park District to provide funds to renovate the dam, particularly if the power generation option is not feasible. We believe the retention of the Coon Rapids dam is very important to both the recreational and economic base of the north metro area and the two communities.

We look forward to working with you to preserve the dam. If you have any questions regarding the resolution, please do not hesitate to contact me at the phone number below.

On behalf of the Anoka City Council,

Mark Nagel
City Manager

MN:dy

Attachment

cc: Marilyn Corcoran
Senator Gene Merriam
Representative Charlie Weaver, Jr.
Mayor Gilbertson, City of Ramsey
Mayor Nee, City of Fridley
Mayor Thompson, City of Coon Rapids
Dan Erhart, Anoka County Comm.
Dennis Berg, Anoka County Comm.

(dy\mn\cr-nam)

2015 FIRST AVE. NO. • ANOKA, MINNESOTA 55303-2270 • PHONE (612) 421-6630
— AN EQUAL OPPORTUNITY EMPLOYER —

MEMORANDUM

DATE: August 13, 1993

TO: Mark Nagel, City Manager

FROM: Melinda Coleman, City Planner

SUBJECT: MISSISSIPPI RIVER COMPREHENSIVE MANAGEMENT PLAN

I have reviewed the draft management plan and noted areas of concern by page number. My primary focus on this relates to the proposed land use and zoning controls.

Page 20: The plan indicates that local governments would continue to have primary land use planning and control responsibilities. Met Council staff would provide assistance on plan development and revision to achieve conformance with this plan. The DNR would provide technical assistance to local governments in revising and administering zoning controls to this plan.

Later in the document it is mentioned that a task force would be created to address permitting and plan implementation. My question is who is going to help cities pay for staff time to rewrite ordinances and comprehensive plans. The DNR typically provides model ordinances and cities staff then rewrite their ordinances and holds the public hearings etc.

6

Page 23: The plan states "new land use and development in the riverfront area (the first 300' back from the river) would include those activities relating to or requiring a location next to the river, activities relating to or requiring a location next to the river, activities preserving historic structures or activities enhancing the river." I question how these are defined and how this relates to the area adjacent to Peninsula Point Park. The 300' setback requirement and scrutinization of uses could be very limiting to our redevelopment plans. More on this later.

7

Page 24: Once again reference is made to cities updating their plans to incorporate new policies. Who pays?

*COMISS.MEMO

1

27

6. Under the MNRRA plan, those communities that elect to revise their plans and ordinances to substantially conform to the MNRRA plan could receive grants from the National Park Service to fund this activity. The National Park Service would request funds to implement this program. The final plan makes this clearer.

7. Local governments would control land uses and development in the riverfront areas. (The definition of the riverfront area has been revised in the final plan to include 300 feet back from the river or the floodplain, whichever is greater.)

COMMENTS

8 **Page 29:** Variance procedures would be adopted to implement policies with consultation from the DNR. The management plan states the results of variance hearings would be reviewed by DNR. Would they be allowed to overturn a decision? What kind of notice and time frame guidelines will be established?

Page 78: The plan states "State legislation would be sought to require that local planning and actions be consistent with this plan. Land use management would continue to be the responsibility of local governments, but their actions would be subject to concurrence by the Met Council (plan) and the DNR (action)". Local governments would continue to have the lead in local economic development planning activities. They would:

- Revise plans and ordinances to conform to the MNRRA Plan.
- Continue day to day implementation of land use control.
- Acquire and develop park land and build trails.
- Receive acquisition and development grants, if implementing plan.
- Conduct economic development activities.
- Operate local parks and interpretive facilities.
- Implement the MNRRA plan on their land.

9 The question that I have with regard to this is, would the state legislation usurp our ordinances, how would this affect Peninsula Park, and how would cities be involved in determining the plans?

10 **Page 79:** Coordination and consistence of land management responsibilities and how they would remain with local government. The question that we have is how would the review process work? Who would it involve? And how would coordination be improved over what is currently in place? Right now it is the responsibilities of the cities to work with the environmental quality board in cases where we are doing projects within the critical corridor. This document talks about how there is a need for improved consistence and coordination of use and development in the corridor, but it does not speak to how this process would be set up. Staff questions time frame, cost, and who would we be primarily working with the Met Council or the DNR?

11 **Page 81:** Talks about strategies for streamlining the regulatory structure. However, it doesn't indicate who will be responsible for addressing the regulatory structure. Is it the current committee, will there be more city involvement since we are the ones who will be primarily working, at least as the first point of contact with development projects in the corridor. The question is who decides on this whole structure for streamlining the process? Another major concern that I have is are we going to be duplicating efforts? And, what kind of timeframe will be involved in obtaining permits? This seems to be two of the major questions in my mind that need to be answered.

12 **Page 205:** Appendix C: Sample Design guidelines. The sample design guidelines will have a great impact on our planning for Peninsula Park and the area surrounding that. The biggest

28

RESPONSES

8. The Department of Natural Resources would not have veto power.

9. The proposal for state legislation to mandate consistency was deleted from the proposed plan. The plan instead was revised to adopt the existing state critical area and shoreland programs as part of the MNRRA plan (seeking federal funding for more effective implementation of these programs) and emphasizes the grant program for land acquisition and development as the primary incentive for communities to update their critical area plans and ordinances to substantially conform to the MNRRA plan. Cities would still have the lead in land use planning for their sections of the corridor, including riverfront redevelopment plans.

10. Additional details about the review process have been added to the plan implementation section of the document and these concerns were addressed.

11. The Minnesota Department of Natural Resources was identified as the lead agency. Cities would have the opportunity to participate in developing strategies to consolidate and coordinate the regulatory process.

12. The sample design guidelines are provided for guidance only and are not mandatory.

concern has to do with setbacks. The management plan requires 100' from the ordinary high water line (plus additional set back for tall buildings in the area 100' to 300' from the shore, see architectural guidelines later) also requires 40' from the bluff line (plus additional setback of 60' for buildings over 25', see architectural guidelines).

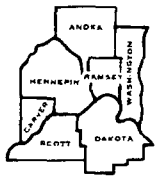
The architectural guidelines go on to say that buildings in the riverfront area (which must be set back at least 100' from the river) should not exceed the following height: 25' within 200' of the river and 40' within 300' of the river. It goes on to say that buildings in the bluff preservation area (which must be setback 40' from the bluffline) should not exceed 25', with an additional 60' setbacks for buildings over 125 feet. Our riparian yard setback from the ordinary high water mark are as follows: in the B1 zone they are 75' with a limitation of a 40' building and in the residential districts the setback is 100' with a 35' building height restriction. If you take a look at our Peninsula Point redevelopment plan, the 300' setback would cut into the Pierce Motel by about 1/3, it would eliminate the opportunity for the Manor Home Project, which is behind the Pierce Motel and the garage area and would also take in the Shiloh House and almost go all the way up to the corner of the Pierce Apartment Building. I think the City of Anoka may wish, at some point, to put into the record our plans for Peninsula Point and the immediate area and note that we have some concerns about building height limitations and use restrictions within that 300' as it pertains to the adopted preferred plan.

13

This summarizes my concerns as it pertains to land use and zoning controls within the critical corridor, I also do have some concerns about funding mechanisms for the work that is going to be thrust upon the City of Anoka, and also how grants and financial assistance would be made available to cities to do work in these areas.

29

13. Under the revised plan compliance is voluntary and plans and ordinances can be tailored to local conditions. Conflicts should be worked out under this process. It would be inappropriate to add site-specific plans for redevelopment to the comprehensive management plan.



METROPOLITAN MOSQUITO CONTROL DISTRICT
2099 UNIVERSITY AVENUE WEST ■ ST. PAUL, MINNESOTA 55104-3431
612-645-9149 ■ FAX 612-645-3246 TDD use Minnesota Relay Service

R.D. SJOGREN, Ph.D.
Director

W.J. CAESAR
Business Admin.

July 27, 1993

Mr. Peter Gove, Chair
Mississippi River Coordinating Commission
Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418, Box 41
St. Paul, MN 55101

Dear Mr. Gove:

The Metropolitan Mosquito Control District (MMCD) biting gnat control program was not included in the Mississippi River Coordinating Commission Scoping Document. This testimony is presented to inform the Commission of the severe biting insect production which occurs in portions of the Mississippi River. This biting gnat annoyance will significantly diminish the outdoor recreation plans of MNRRA if not permitted to continue.

The following is comment on the draft comprehensive management environmental impact statement for the Mississippi National River and Recreation Area. Reference is made to documents which have been submitted previously by the MMCD which are on file of the Mississippi National River and Recreation Area.

In response to citizen concerns about biting gnat annoyance and allergic response, the metropolitan county commissioners established a biting gnat control program in 1984. This information is documented in the attached publication "Black fly (Diptera: Simuliidae) problems and their control strategies in Minnesota". Also attached is a brochure "Metropolitan Mosquito Control District, Black Fly -Biting Gnat- Control Program", which provides general information.

The gnat control program is under the supervision of the Minnesota Department of Natural Resources, via an annual permitting process. Since the inception of the program, one half million dollars have been spent by the District to conduct aquatic non-target impact studies to confirm the environmental safety, which is also extensively

reported in the scientific literature, of the soil bacteria *Bacillus thuringiensis israelensis* (BTI) used to control gnat larval populations.

Commentary follows on relevant statements contained in the draft comprehensive management environmental impact statement:

General Statement

- Control of pest insect species is a component of enhanced enjoyment of public outdoor recreational activities in the area identified in the findings and purposes (Sec. 701(a), Title VII, Mississippi National River Recreation Area Act).
- Scientific evidence available indicates such control measures do not conflict with other directives including "preservation and enhancement of the environmental values of the area" or "conservation and protection of scenic, ... scientific values of the area."

Natural Resource Management -Proposed Policies and Actions

- Item 6. Reduction of the use of chemicals for ... pest control has been realized in the employment of biological control agent BTI.
- Addition of Item 26 is proposed: Support state and local government IPM programs (with component selection based upon existing scientific evidence indicating the method works now) to prevent, manage, and decrease annoyance insects in the river corridor.

1

Visitor Use and Interpretation -Proposed Policies and Actions

- Management and prevention of annoyance insects in the river corridor will contribute to increased visitor enjoyment and appreciation of natural and cultural features and outdoor recreational activities.

Thank you.

Sincerely,

R.D. Sjogren

Robert D. Sjogren
Director

31

1. See response to comment G-3-1.

Minnesota
Department of Transportation
Transportation Building
395 John Ireland Boulevard
Saint Paul, Minnesota 55155

July 28, 1993

Mr. Peter Gove
Mississippi River Coordinating Commission
c/o National Park Service
175 E. 5th St., Suite 418
St. Paul, Minnesota 55101

Dear Peter:

In response to your request at the May 22nd Commission meeting, Bill and myself and several members of the Upper Mississippi Waterway Association have redrafted the information concerning Commercial Navigation. This information should be included in Draft #4. The new text starts on page 34 and continues onto pages 37 and 38.

Sincerely,

Richard F. Lambert

See responses to MNDOT letter G-15

Wording changes for MNRRA on pp.34-38 on the Draft plan.

Delete everything after<u>Commercial Navigation</u> (page 34) & going thru 2nd paragraph on page 37 ending with the words "during the life of this plan" , substitute the following wording:

In the 1930's, the federal government, in an effort to open the midwest agricultural economy to international markets and to create employment and other economic benefits, began the construction of the Upper Mississippi River navigation system. Benefits of the construction of that system and its locks and dams have spread over many activities beyond just commercial navigation. With the construction of the locks and dams, huge pools of water were formed. These pools provide valuable fish and wildlife habitat and vast expanses of water for recreational use, municipal water supply and water supplies for a number of industrial and agricultural uses.

Commercial navigation provides an economical, safe, energy efficient, and environmentally friendly form of transportation for millions of tons of freight each year. It provides the Twin Cities region and upper Midwest with a vital link from the nation's agricultural heartland to domestic and international markets. The terminals in the region are a focal point for shippers that serve a large part of the upper Midwest. River terminals in the Twin Cities region annually handle 15 to 20 million tons of commodities. The river system provides efficient transportation to and from the region, including:

- grain and mill products shipped to processors throughout the nation's heartland and to export terminals at the mouth of the river near the Gulf of Mexico
- other major long-haul southbound shipments include coal, potassic fertilizer, scrap iron, and petroleum coke
- inbound shipments of coal, phosphatic fertilizer, salt, petroleum products, chemicals, cement, steel, and pipe
- large local movements of sand and gravel and petroleum products

Because of its energy efficiency, the towing industry provides service to the midwest at costs far below those of other bulk transportation modes. It also helps maintain the competitiveness of rates of competing modes. Beyond the industry's influence, in the Western Dakotas, land transportation rates to export terminals are significantly higher. Towing industry energy efficiencies also produce much lower levels of exhaust emissions and

Barge traffic levels fluctuate but maintain an upward trend. Based of those fluctuations, a study done by Temple, Barker, and Sloane, in 1987, projected a leveling out of traffic through the year 2010. Another study (Fruin 1992) based soley on decreased grain movements caused by a loss of the Soviet market, projected even slower growth.

Other studies have projected continuous growth. They include the GREAT 1 study, the Mississippi Master Plan, and the Mid America Ports Study. The most conservative estimates of maritime freight traffic growth on the Upper Mississippi River, in those studies, anticipate a steady 2% annual growth over the next 20 years. Following a dramatic drop from 23 million tons in 1984, to just over 16 million in 1985, traffic has grown to 19.5 million tons in Minnesota in 1991. The high level, in 1984, represents the impact of a severe drought in the eastern corn belt which forced additional grain purchases from the Minnesota agricultural community served by terminals in the Twin Cities' area. In 1992, the U.S. Army Corps of Engineers recorded the third highest volume of goods movement in history through Lock and Dam 2.

The increased growth in waterborne traffic, which is greater than projected by the two most recent studies of the area's potential, reflects a small increase in grain but major increases in fertilizer, coal, aggregate and general cargoes. For the past 25 years grain terminals on Minnesota's part of the river have contributed an annual average of 7% of the total national grain export volume.

(Third paragraph on page 37, delete the 3rd and 4th sentences berginning "Decisions about" and ending with "impact on aquatic life" and replace with:
Commercial navigation growth in the Metro area will be based on shippers' increased cargo transport needs. Fleeting growth will be based on the same increased transport needs. New or expanded commercial navigation facility activity will be balanced with concern for other resource values in the corridor using historic environmental assessment procedures.

(Page 38---3rd paragraph from the bottom.) Rewrite the last sentence to read : Moored barges must not present an impediment to navigation (either commercial or recreational) nor damage the integrity of the river.

CITY OF
SOUTH ST. PAUL

OFFICE OF CITY ADMINISTRATOR
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125 THIRD AVENUE NORTH
SOUTH ST PAUL, MINN. 55075-2097

August 2, 1993

Peter Gove, Chairman
NBRRA Commission
175 East 5th Street
Suite 418, Box 41
St. Paul, Minnesota 55101

Dear Mr. Gove:

As I stated in my formal presentation at the public hearing Wednesday night, we appreciate your time and effort in chairing this most comprehensive approach to preserving the natural amenities and working river aspects of the Mississippi River.

We testified that it is absolutely essential to the City of South St. Paul that the language on page 24 which exempts land behind existing levees from this 300 foot riverfront use policy. We are very serious about this and our concern is based on our plan and efforts over the last 10 years to redevelop this area.

What you need to clearly understand is the nature of the area we are talking about. Most of the river area in South St. Paul and all of the area in our business and industrial park is separated from the river by a levee and a railroad. The levee is a well engineered structure which functioned very well in the recent floods and prevented any damage in South St. Paul.

The railroad is the Chicago and Northwestern mainline which was relocated years back from the middle of the City to the riverfront. That is a decision which might not be made today but which was made and I think should be taken as fact at this time.

These two barriers basically make the area of our business and industrial park inaccessible to the river. We cannot build water based uses such as barge terminals because we could not work around the railroad and the levee. I would be quick to add that at this time, there is probably no known need for this type of facility anyway.

We are building a trail along the river for everyone to enjoy the river and we have built a public boat launch on the river side of the levee (now underwater). We are planning a pedestrian

COMMENTS

walkway over the railroad to get to the trail. We are planning park and recreation uses behind the levee in several areas.

1 The list on page 25 which lists the types of uses which would normally be discouraged are those which we are seeking in our industrial park. We are building a general use business and industrial park which cannot be restricted by this plan. We are seeking general industry and warehousing that does not need access to the river because all of the property behind the levee and the railroad does not have access to the river. We are not seeking and will not allow open outdoor storage uses which are not incidental to another permitted use. While there is need of this type of use in St. Paul, it will never happen in South St. Paul and anything you can do to get the area in St. Paul cleaned up will be strongly supported by South St. Paul. These junk areas are not only an eye sore, but are not protected by a levee and therefore allow many strange things to float down the river when we have floods like this year.

In short, I hope you can see that we are treating the river frontage as everyone wants to see it treated, but we cannot give up prime industrial land which cannot be seen from the river because of the levee and the railroad, simply because someone has drawn a 300 foot setback line on a map. We do not anticipate very much happening within the first 300 feet because of the levee and the railroad, but we do not see any sound reason why we should be prohibited

2 from any uses we approve which may venture into this area. The document is well written as it stands on this issue, the reason for the exemption is well documented and there is no real argument for removing the language which has been agreed on several times by the full commission.

If you have never walked or driven around this area of the riverfront or have not seen it from the river site, I would be happy to arrange both for you because I know that you will then see what we are saying is true. The only reason I can think of to limit South St. Paul's Industrial and Business Park would be to give an advantage to some other city to develop its industrial area and I hope this is not what this is all about.

Thank you for your probing questions at the hearing, it allowed us to state our case and hopefully this letter has given you and the rest of the commission the information you need to complete your task.

Sincerely,

Douglas S. Reeder
City Administrator

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RESPONSES

1. The policy was simplified and the subject list was dropped.

2. Under the revised riverfront policy the levee exception is no longer needed and was dropped. The policy was made more general and is not a requirement; the specific acceptable or discouraged uses are no longer listed. The final plan offers more flexibility, and exceptions for specific areas are no longer needed. Specific policies can be tailored in local plans for local conditions.

TESTIMONY ON BEHALF OF THE CITY OF SOUTH ST. PAUL

PRESENTED BY

DOUGLAS S. REEDER, CITY ADMINISTRATOR

On behalf of the City of South St. Paul, I would like to thank the Commission for this opportunity to be heard on the proposed Comprehensive Management Plan for the Mississippi National River and Recreation Area.

We commend the Commission and the staff for the many hours of work in drafting this document and the very comprehensive hearing schedule to allow public comment.

We are in general pleased with the Plan and feel that the Commission has done an excellent job of developing a plan which protects the rights and interests of all of the various interest groups and the general public. We would like to make some specific comments.

37

3 1. We feel that it is absolutely essential that the Mississippi River continues to be recognized as a Working River. There are some areas in the document that seem to assume that local government is not doing its job in preventing development which will lead to environmental problems. We would argue that in addition to the myriad of existing state and federal regulations protecting the environment, that local government has been doing an excellent job of protecting the environment, usually in a stricter manner than required by federal and state requirements. Therefore no further level of

4 environmental controls really need to be put in place on the Mississippi River which will merely lead to difficulty in developing undeveloped property.

3. The plan does so. Additional text was added to the general concept and commercial navigation sections to further stress this.

4. The plan does not propose any additional level of environmental controls and the document was revised to clarify this.

COMMENTS

RESPONSES

5

2. Concerning local planning efforts, we request that the plan accept the local plans which are in place unless there is evidence found that the plans are incompatible with the goals of protecting the Mississippi River. Rather than having every city submit their plans to anyone, and rather than having these already adopted local plans remain in limbo until approved by some higher body, our suggestion is that the local plans remain approved until and unless the Commission or other designated agency finds that the plans are in conflict. If and when that happens, a process could be put in place to solve the conflict. This would allow development to continue uninterrupted by delays at some higher level possibly caused only by an inability to act quickly. Since this metropolitan area competes with other states and regions for economic development, the speed of the approval process is very very important. South St. Paul is concerned about this aspect because we have a vast amount of industrial and commercial property to develop along the river corridor. We think the efforts of South St. Paul in the development of a river front trail and adjoining park areas is what the Commission wants for the corridor area and we think that another layer of approval on our development process will only be detrimental.

5. Implementation would be based on the existing critical area program and would build on plans that are in place. All corridor plans would be reviewed for conformance with the MNRRA comprehensive management plan and nonconformities would be addressed on a case-by-case basis.

6

3. The City of South St. Paul continues to not understand the need for additional legislation to give additional authority to the Metropolitan Council or any other state agency to review and approve. We feel local government is the most responsive level of government and that there is no evidence that we are not doing a good job of land

6. The proposal for additional legislation has been dropped.

use planning. If legislation is felt needed, let it be management by exception. If evidence becomes available that any city is not acting appropriately, then require some oversight from a higher agency.

7 4. Finally and most importantly for the City of South St. Paul, we appreciate the efforts of the Commission to allow us to continue to develop our industrial park which

8 is located next to the river. As you know, the current language exempts land behind a flood levy from the 300 foot riverfront land use policy. This language is very important to the City of South St. Paul because we are in the midst of developing an area which is the only industrial land available in South St. Paul. What we have achieved to date is to remove two massive old meat packing plants and clear the land for new modern development under development standards that will insure a good looking park which will be 100% better than the appearance of the old buildings. In addition we are in the process of building a regional trail on the top of the levee which will be a major recreational feature along the Mississippi River in years to come. We can assure you that the current language is very important to the development of South St. Paul and that you will all be very pleased with our industrial area when it is complete. If any of the Commission has any questions about this language we would be happy to meet with you and show you our plan and progress to date. We request that before any action is taken to remove this exemption, that the City of South St. Paul have the opportunity to discuss this with the Commission in detail.

39

7. The plan does not prevent the development. The riverfront policy was revised to stress quality development (and measures to make new development compatible) more than the specific use along the river. General criteria for desirable use and development were added to take the place of the list of specific uses.

8. The levee exception is no longer needed because the riverfront policy was revised and the list of encouraged and discouraged uses was eliminated. See response to comment G-8-2.

COMMENTS

RESPONSES

I thank you for permitting the opportunity for our comments. We commend you for your efforts in preparing a plan to preserve a most precious natural resource, while allowing it to remain the "Working River" it has been in recent history. We will work with you in every way. We are determined to have our land along the river become the best planned, most functional and best looking of any area along the river. It will include many opportunities for very positive recreational experiences by our residents and the entire metropolitan area while permitting replacement of the massive tax base lost with the closing of the meat packing plants.

PORT AUTHORITY OF THE CITY OF SAINT PAUL
1900 LANDMARK TOWERS • 345 ST. PETER STREET • ST. PAUL, MN 55102-1661 • PHONE (612) 224-5686
FAX (612) 223-5198
TOLL FREE (800) 328-8417

July 30, 1993

Ms. Joanne Kyral
Superintendent
National Park Service
175 East Fifth Street
Suite 418
St. Paul, Minnesota 55101

Dear Joanne:

Attached for your information are my comments from the hearing on Thursday, July 29. If you have any comments or questions, please give me a call.

Sincerely,

Lorrie Louder
Director
Industrial Development

LJL:ca

Attach.

cc. C. Wiger

41

MNRRA COMMISSIONERS PUBLIC HEARING
MISSISSIPPI MNRRA CORRIDOR DRAFT MANAGEMENT PLAN
JULY 29, 1993

Summary of Port Authority Testimony

I. Port Authority and Business Stakeholders Primary Concerns

A. Working River
B. Balance between economic growth and environmental preservation
C. Local control over land use and development decisions

II. Plan Comments

A. Changes to prior drafts have significantly improved the Plan content and tone.
B. There are two key remaining concerns:

1. Not enough credence given to industrial development and development that, in urban areas, should be seen from the opposite shore.

2. Proposal review process indicated in Plan is less than adequately defined, is hazy, and generally indicates a cumbersome scenario of multiple reviews with no time frames.

a. Our concerns related to the overly lengthy process that is out of the hands of local government (this will undoubtedly chase certain private sector growth away).

b. The National Park Service (NPS) could stop a project with the "slow no" (as perceived by the business community/company proposing certain project). The Stakeholders and Port Authority were assured by the NPS Superintendent that NPS just wanted to be at the table and would not lengthen at all the review process.

* We urged the Commission to include an example of a review process, to lend more specificity to the general process outlined in the Plan.

c. THE PLAN DRAFT LANGUAGE SHOULD BE AMENDED AND CLARIFIED

1. The lists of acceptable and discouraged riverfront uses have been removed from the riverfront policy. The plan encourages setbacks and vegetation screening to make the corridor appear natural from the river or opposite shore, but it recognizes that this may not always be practical.

2. The plan implementation section was revised to clarify this and further define the review process. Specific time frames are beyond the scope of the plan. However, the plan endorses using existing processes and concurrent review where possible.

III. Specific Plan Comments

A. Industrial Development

1. The term may create concern (smokestacks, large warehouses, polluting uses)

3

a. But, the type of industrial development we are proposing in concept is in fact clean, well designed, well landscaped and includes job intensive uses besides structures.

b. Page 24 - Plan quotes "industry that requires riverfront for its function should be allowed": We urge the Commission to take a different view and recognize that there are some very quality, value added, job intensive light manufacturing uses that technically do not require the river for its function but nevertheless should be located on certain developable sites in the Corridor in urban areas.

4

c. Page 24: Add the words "light industrial" to the statement on allowing office buildings in the Corridor.

d. Page 25: The language regarding appropriate development that is encouraged is too limiting.

5

2. a. The Plan states "undeveloped land areas would appear open as observed from the river and opposite shore". We urge the Commission to change this language. It may be very good for rural, but there needs to be exception language for urban areas; it is not realistic or expected by the general public that there would not be a view of the Downtown skyline including office and other commercial/industrial uses seen from Park Service areas such as Harriet Island/Interpretive Center.

6

b. Page 26: The Plan indicates "develop incentives for non-river dependent industries to relocate out". We urge the Commission to delete this or amend the language. In Saint Paul, for example, there are viable economic uses in the category of light industrial and office that do not technically require the river itself (Holman Field buildings, light manufacturing facilities, etc.). We believe it is not necessary or practical to spend public dollars in removing these uses, since they in no way harm the river or pollute the environment.

* A suggested language change would be to indicate that the event to trigger such provision of incentives would be for industry that is a "noxious use" or a polluting entity to the environment and/or River.

43

3. See responses to comments G-8-7 and G-10-1.

4. See responses to comments G-8-7 and G-10-1.

5. The exception language for downtowns was inadvertently deleted from one place in the text. The major downtowns would be excepted, and these areas would be specified in local plans. This has been clarified in the final MNRRA plan. The intent is for downtown areas to be treated differently. The plan recognizes that they would be visible from the river and opposite shore. Existing commercial and industrial areas outside downtowns would also be excepted. However, new developments should appear natural from the river using setbacks and vegetative screening, and shoreline restoration is still encouraged in existing commercial and industrial areas.

6. With the revised riverfront policy, which emphasizes quality development, this suggested language is no longer necessary. It is still appropriate to encourage nonriver-related uses to relocate to achieve the visions and policies of the plan, especially if they are causing adverse impacts on the corridor and not contributing to the riverfront environment.

COMMENTS

B. Local Control

1. The Plan adoption process as outlined in the NPS Plan should include specific time frames in order to be fair to the local communities. 7

   a. An example on the East Coast of a major time frame problem due to an open-ended process is that of the Upper Delaware, whereby more than ten years of local plan adoption process was undertaken, which never reached conclusion and ultimately required a major overhaul of the entire process. It is imperative that we avoid this type of situation.

2. Page 20: The Plan indicates that "new business development would continue to be a function of local plans and programs". If this is indeed the case, we would recommend that the Process and Review Section of the Plan reflect and recognize this concept. This could dramatically simplify the apparent lengthy and duplicative process currently generally outlined in this draft. 8

IV. Summary

A. The Port Authority, Business Stakeholders, Sierra Club and Citizens for Better Environment have formed an alliance which has resulted in the outline of issues of common agreement. We are committed to continue that process and to discuss areas of mutual concern.

B. The Port Authority and Business Stakeholders look forward to continuing to work with NPS staff. We are available to discuss the details of our testimony and to assist in providing draft language, as may be requested by Superintendent Kyral.

C. We continue to appreciate the Commission's openness in considering our comments and concerns.

RESPONSES

7. The setting of specific time frames is beyond the scope of the plan. They would be worked out after the plan is final. Time frames associated with existing land use management programs would remain in effect.

8. The review process was clarified in the final plan.

As Lorrie mentioned on the phone to you recently, Larry Romans from Congressman Vento's office provided comments to our Board at the October 26 meeting. He indicated that economic development of the River will continue, the Park Service will not duplicate the permitting process and has no power to stop a permit that has been approved, and the Park Service may comment and make recommendations to the local authorities during a particular review process. He further emphasized that the Park Service will primarily be working on visitor centers and will serve in a coordinating role regarding the implementation of the MNRRA Plan. Regarding local variance, he indicated that the Park Service does not have the authority to compel a certain action, and he envisioned a cooperative effort on the part of the Park Service with local authorities. The Port Authority's Board Chairman, Howard Guthmann, indicated that he wanted it noted for the record that he expected a promise from Mr. Romans that there would always be timely response from the Park Service on local development issues on which they chose to comment. Mr. Romans replied that he did not believe that this would be a problem.

We want to make it clear to you, Superintendent Kyral, that we believe it is imperative that you and your staff work diligently to clarify language in certain parts of the MNRRA Draft Plan as outlined in the attached response. We furthermore expect that you will be managing the implementation of this Plan in full accordance with the comments provided to our Board by Mr. Romans.

Thank you for the opportunity to respond to the MNRRA Draft Plan, and we continue to be readily available to you regarding any further cooperative efforts in this regard.

Sincerely,

Kenneth R. Johnson
President

cc. L. Louder
M. Strand
C. Wiger, Business Stakeholders
L. Doerr, CBE

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City of Hastings

HASTINGS
ON THE
MISSISSIPPI

100 Sibley Street • Hastings, Minnesota 55033-0097
612 • 437 • 4127 • Fax: 612 • 437 • 7082

August 2, 1993

JoAnn M. Kyral, Superintendent
Mississippi National River and Recreation Area
175 East Fifth Street
Suite 418
Box 41
St. Paul, Minnesota 55101

Dear Ms. Kyral:

This letter serves as a comment from the City of Hastings on the "Draft" Comprehensive Management Plan Environmental Impact Statement for the Mississippi National River and Recreation Area.

On behalf of the City of Hastings I would like to complement the National Park Service on the completion of the "Draft" Comprehensive Management Plan Environmental Impact Statement. The public participation provided for in the planning process has been exceptional.

The "balanced approach" to resource protection and use in the river corridor corresponds nicely to the long term interests of the City of Hastings in respect to the Mississippi River.

I should note, however, that the City of Hastings would like to see a specific reference (p. 67) relating to the proposed Hastings Interpretive Center modified. On page 67, of the "Draft" there is a reference which states:

> "The information function would be located in the old courthouse (now being renovated for city offices) in a space on the first floor near the rotunda. Major advantages of this space are the visibility of this site from U.S. Highway 61, location in an historic building near the historic downtown district and river, and visibility and ease of access for people conducting business with the city."

The availability of space in the courthouse for MNRRA use was tentative when this matter was discussed with NPS staff and City needs have now become more clear. It has been determined that this space will no longer be available.

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COMMENTS

1 The City of Hastings is still interested in working with the National Park Service in developing a Hastings Interpretive Center, however, space will not be available in the new City Hall (Old Courthouse).

Please feel free to contact me if you have any question regarding this letter.

Sincerely,

Michael A. Woziak

Michael A. Woziak, AICP
Community Development Director

cc: Dave Osberg, City Administrator
John Grossman, HRA Director

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RESPONSES

1. The NPS staff would continue to work with partners in this area to identify an interpretive center site. In the interim, based on discussions with key partners in the area, the plan indicates that the center would be in the general area of Hastings but does not specifically reference a site.

RESOLUTION NO. 90-93

CITY OF HASTINGS

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF HASTINGS OFFERING COMMENTS ON THE MISSISSIPPI NATIONAL RIVER AND RECREATION AREA "DRAFT COMPREHENSIVE MANAGEMENT PLAN AND DRAFT ENVIRONMENTAL IMPACT STATEMENT

WHEREAS, On November 18, 1988, Public Law 100-696 established the Mississippi National River and Recreation Area (MNRRA) as a unit of the national park system, which is composed of over 370 areas administered by the National Park Service (NPS), an agency of the U.S. Department of the Interior.

WHEREAS, the MNRRA was established by Congress to (1) protect, preserve, and enhance the significant values of the Mississippi River corridor through the Twin Cities metropolitan area, (2) encourage coordination of federal, state, and local programs, and (3)provide a management framework to assist the state of Minnesota and units of local government in the development and implementation of integrated resource management programs and ensure orderly public and private development in the area.

WHEREAS, The MNRRA includes 72 miles of the Mississippi River and four miles of the Minnesota River and encompasses about 54,000 acres of public and private land and water in five Minnesota counties, stretching from Dayton to just south of Hastings.

WHEREAS, the Mississippi River Coordinating Committee was established to ensure local assistance to the secretary of the interior in planning for the national river and recreation area.

WHEREAS, under the guidance of the Mississippi River Coordinating Committee and including substantial public participation; a "Draft Comprehensive Management Plan and Draft Environmental Impact Statement for the MNRRA have been prepared. This draft comprehensive management plan and draft environmental impact statement provides a proposal that emphasizes a balanced approach to resource protection and use in the river corridor. Alternatives offer a range of options for issues identified in the plan. A no-action alternative (A) is included to facilitate comparison. Alternative B would emphasize greater resource protection than the proposal; alternative C would emphasize greater use and development than the proposal. Impact of the proposed plan and the three alternatives have been assessed.

WHEREAS, the National Park Service has held a series of public meetings and has solicited written comments from concerned parties including the City of Hastings.

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WHEREAS, the National Park Service has held a series of public meetings and has solicited written comments from concerned parties including the City of Hastings.

WHEREAS, the City of Hastings has monitored the preparation of the MNRRA "Draft Comprehensive Management Plan and Draft Environmental Impact Statement" and has participated in public forums and with written comments as deemed appropriate.

WHEREAS, the City of Hastings has adopted plans and ordinances with the express intent of protecting and preserving the beauty and resource value of the Mississippi River while allowing for balanced use.

NOW THEREFORE BE IT FURTHER RESOLVED, the City of Hastings is supportive of the basic vision identified for the national river and recreation area which would promote partnerships between the corridor's political entities and various constituencies to create the desired future and achieve the legislative purpose for the 72-mile-long corridor through the Twin Cities. However, Hastings is concerned that implementation of the MNRRA Plan may result in another layer of government bureaucracy which is is not needed. The City currently administers numerous ordinances and plans with the purpose of protecting and enhancing the Mississippi River which are very much consistent with the intent of the MNRRA plan. These include Hastings' Mississippi River Critical Area Plan, the Vermillion River Watershed Management Plan, the Hastings Downtown Master Plan, Hastings' Shoreland Management Ordinance, Storm Water Management Ordinance and Flood Plain Management Ordinance. Considerable City resources are currently devoted to administering City plans and policies and coordinating with other regulatory agencies with jurisdiction including the Mississippi River. Redundant review mechanisms which unnecessarily delay local land use decisions should be avoided if at all possible. This specifically includes the requirement that variances to local government ordinances adopted to implement policies of the plan be subject to review by the State of Minnesota Department of Natural Resources (p. 29 Draft Plan). In theory this type of redundant review is logical in order to avoid undesirable conflicts with the MNRRA plan, however, in practice it will likely result in costly and unnecessary delays. The City of Hastings has a vested interest in protecting, preserving and enhancing the Mississippi River, however, it also has an obligation to the public to streamline land use decision making and avoid excessive bureaucracy. In the spirit of "reinventing government" it is requested that the National Park Service and MNRRA Coordinating Commission modify the MNRRA Plan to minimize unneeded intervention in site specific local land use decision making.

BE IT FURTHER RESOLVED, the City of Hastings does not object to the preferred plan option which emphasizes a balanced approach to resource protection and use in the river corridor.

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BE IT FURTHER RESOLVED, the City of Hastings recognizes the general nature of the draft comprehensive management plan and environmental impact statement and requests that the City be consulted with and involved in policy making and development of specific programs and projects that will be necessary to implement the MNRRA Comprehensive Management Plan and may affect Hastings.

ADOPTED BY THE CITY COUNCIL OF THE CITY OF HASTINGS, MINNESOTA THIS 7TH DAY OF SEPTEMBER, 1993

Ayes: Trautmann, Johnson, Warner, Hicks, Simacek, Riveness and Mayor Werner

Nays: None

ATTEST:

Barbara C Thompson

BARBARA C. THOMPSON, CITY CLERK

MICHAEL D. WERNER, MAYOR

RANDY JOHNSON
COMMISSIONER

PHONE
612-348-3088
TDD 348-7708
FAX 348-8701

BOARD OF HENNEPIN COUNTY COMMISSIONERS
A-2400 GOVERNMENT CENTER
MINNEAPOLIS, MINNESOTA 55487-0240

August 9, 1993

Mr. Peter Gove, Chair
Mississippi River Coordinating Commission
Mississippi National River and Recreation Area
175 East Fifth Street
Suite 418, Box 41
St. Paul, MN 55101

Dear Peter:

1 I write in support of the inclusion of the Metropolitan Mosquito Control District (MMCD) biting gnat control program in the Mississippi National River and Recreation Area (MNRRA) Draft Comprehensive Management Plan - EIS.

I participated in the initiation of the MMCD gnat control program in response to citizen concerns over severe biting insect annoyance, and allergic reactions. The problem was identified as coming from local streams and rivers. The Mississippi River is recognized as the largest source of annoyance.

The impetus for the formation of the program was the availability of a soil bacteria which is both effective and highly selective for gnat control. The MMCD has conducted one half million dollars of research, and it confirmed the scientific literature which documents the environmental safety of the program. Annual treatment permits are obtained from the Minnesota Department of Natural Resources.

I encourage you to include gnat control in your planning to enable citizens to enjoy the full benefits of your investment in MNRRA planning.

Very truly yours,

Randy Johnson

Randy Johnson cmc
Commissioner

RJ:cmc

PRINTED ON 100 PERCENT RECYCLED PAPER

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1. See response to comment G-3-1

United States Department of the Interior

BUREAU OF MINES
Intermountain Field Operations Center
P.O. Box 25086
Building 20, Denver Federal Center
Denver, Colorado 80225

August 10, 1993

Memorandum

To: Superintendent, Mississippi National River and Recreation Area, National Park Service, 175 East Fifth Street, Suit 418, Box 41, Saint Paul, Minnesota 55101

From: Supervisory Physical Scientist

Subject: Review of Draft Comprehensive Management Plan/Environmental Impact Statement for the Mississippi National River and Recreation Area, Anoka, Ramsey, Washington, Dakota, and Hennepin Counties, Minnesota

At your request, personnel of the Bureau of Mines reviewed the draft Comprehensive Management Plan/Environmental Impact Statement (DEIS) from the perspective of project effects on mineral resources and mineral-related activities. As we understand it, the proposed management plan will provide guidance for managing the 72-mile-long Mississippi National River and Recreation Area corridor, designated by Congress in 1988.

An examination of library and file data, without the benefit of field investigation, revealed that developed mineral resources in the vicinity of the Mississippi National River and Recreation Area, include clay/shale, carbonate rocks, sandstone, and sand and gravel. The subject document recognizes that the Mississippi River corridor, particularly in the Twin Cities area, continues to be an important area for mining industrial mineral resources (p. 111-112), but does not mention how the proposed management plan will affect future development of those resources. We suggest that subsequent versions of the EIS discuss impacts to mineral resources. If, after study, no adverse impacts to mineral resources are identified, a statement to that effect should be included. Such an inclusion would provide users of the document with knowledge that mineral resources were considered during project planning. 1

If you have questions regarding this review, please contact Robert Wood at (303) 236-3400.

Mark H. Hibpshman

rhw/cvl

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1. A statement of no effect was added in the Environmental Consequences section of the final environmental impact statement.

Minnesota
Department of Transportation
Transportation Building
395 John Ireland Boulevard
Saint Paul, Minnesota 55155

August 19, 1993

JoAnn Kyral, Superintendent
Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418, Box 41
St. Paul MN 55101

SUBJECT: DRAFT COMPREHENSIVE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT

Dear Ms. Kyral:

The development of the Mississippi National River and Recreation Area (MNRRA) within the Twin Cities Metropolitan Area presents a truly unique potential to preserve and enhance an outstanding ecological, cultural, recreational, and economic resource. We applaud the work of the Mississippi River Coordinating Commission, whose members have labored to bring this draft plan to the public. Such work is often a thankless task, and we appreciate their efforts.

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It is vital to pay close attention to this Plan. It is critical that the Plan not only preserve and enhance natural and recreational resources within the river corridor, but also that it insures the continued economic vigor of the Twin Cities, the State of Minnesota, and indeed the entire Upper Midwest. Long after those who have worked on the Plan have gone on to other endeavors many pivotal land use decisions within the Metropolitan area will draw upon the Plan for guidance.

The Mississippi River has exerted a defining role in the history, culture, and economy of Minnesota. While the nature of the economic activity has changed over the past century and more, the river continues to play a major role in the economy of Minnesota and beyond. Indeed, the law creating the Mississippi National River specifically mentions the river as a nationally important economic resource. Further, the law provides for the enhancement of the river resources, including the economic resource, for the benefit of the people of the United States.

While the river corridor is itself quite narrow through the Twin Cities, the influence of the river extends far beyond high water lines, or blufflines. Farmers and shippers

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throughout Minnesota and the Dakotas depend upon water transportation. Agricultural cargoes which go down the river are destined for ports in Africa, Europe, the Far East, and elsewhere. Minnesotans also receive many cargoes via the river. As Minnesotans, we have to avoid the tendency to think of the river as though it is only a few hundred yards wide.

We need to keep in mind that the Mississippi is a working river, that the cities of Minneapolis and St. Paul are located where they are because of the industrial, commercial and transportation opportunities the river provided to early settlers. We must not lose sight of the fact that the Mississippi River continues to function as a major transportation artery for the entire United States.

We have a number of major comments on the draft Plan:

Commercial Navigation
We have a large number of both general and specific comments on this vitally important issue. These are found in the detailed comments attached to this letter, beginning at page A-5.

Highways
We also have a number of comments on the highway transportation element, which are found throughout our attached detailed comments.

Specificity
1 The Plan is replete with language which suggests that some activity or other would be allowable, "if consistent with the plan." Yet, one may look to the Plan for guidance on a specific proposal, and find no guidance there. The Plan needs to provide certainty. As currently written, the Plan is characterized by ambiguities which make it subject to a wide variety of interpretations. A plan should be specific, to preclude the possibility of a person seeing whatever he or she desires to see in the Plan. Our experience with Master Plans is that over time their provisions are often interpreted more rigidly than their framers may have contemplated. At the series of public hearings held on this subject, some who spoke saw features in the Plan that Commission Chair Gove responded to by indicating, 'that was not the intent of the Commission.' The Commission is set by law to expire in 1998. Chairman Gove and other commission members will have left to other endeavors. NPS staff will likely have moved to other locations or positions within the agency. Yet, someone will be asked to make decisions about proposals being "consistent with the Plan." In making these determinations, that person should be guided by specific references to activities and land uses. He or she should be able to juxtapose some proposed activity or land use against a specific provision in the Plan and make a clear and simple consistency determination. The absence of specific guidance presents the possibility that the decision will not result from the application of clear standards to specific situations, but may be the introjection of the personal or organizational biases of the decision maker.

1. This is a policy plan providing a framework for additional planning and decision making. It is not the intent of the plan to provide specific guidance on specific proposals.

An essential component of economic planning is to rationalize the process, to introduce predictability to the process. For this to happen, the Plan needs to be clear and specific. We believe this is true not only for the activities of our own agency but for a great number of other important economic activities as well.

Intermodal Omissions

2 The draft Plan is silent on a number of issues which we believe it should specifically address. It does not contain a thorough inventory of the transportation infrastructure within the corridor, it does not include discussion of a variety of very important transportation facilities, and does not address a number of issues important to transportation.

Holman Field in St. Paul is located entirely within the boundaries of MNRRA. Holman Field plays an important role in the Metropolitan Aviation system as a major reliever airport. How does the Plan interface with the plans of the Metropolitan Airports Commission? How does the Plan relate to the aviation plans of the Metropolitan Council? How does the fact of being within the MNRRA Corridor effect any needed future expansion at Holman?

Minneapolis-St. Paul International Airport (MSP) is virtually next door to MNRRA. Further, the dual track airport planning process is currently underway, evaluating whether a new airport will be constructed. If a decision is made to construct a new airport in Dakota county, the land transportation system required to service the new airport will need substantial improvement. This could include major improvements to the highway system in Dakota County, and could conceivably include a new crossing of the Mississippi. On the other hand, if a decision is made to not build a new airport, it is likely that expansion will occur at MSP. Rigid interpretations of proposed policies in the MNRRA Plan could raise questions regarding both new airport construction, and improvement at MSP. This could thereby jeopardize the comprehensive airport dual track planning process currently underway.

We believe it critically important that the Plan not be silent on these issues. Rather, it should recognize the importance of these facilities for the region and the state. It should specifically address land within and adjacent to the MNRRA corridor as appropriate to support either airport decision. The Plan must integrate the comprehensive dual track airport planning and environmental study.

3 There is no discussion of the Federal Intermodal Surface Transportation Efficiency Act (ISTEA), and the strong emphasis on intermodalism within that act. Intermodal links between highways, air, rail, and waterborne transportation are encouraged in this act. Intermodal facilities have historically located within river corridors, and this is particularly true within the MNRRA corridor. ISTEA also includes a number of programs which present opportunities for cooperative projects to improve recreational, natural, and cultural resources, i.e. Scenic Byways, and Enhancement projects.

3

55

2. The MNRRA legislation specifically directs that the plan address commercial navigation. These other major transportation issues were not identified by Congress in the legislation, nor were they identified as major issues during the scoping process for the draft plan/environmental impact statement.

The following changes in the document respond to this and related comments.

A statement was added that underscores that the MNRRA corridor is a historic transportation corridor. It identifies railroads as a traditional use in the corridor that would continue. It states (as with site-specific issues) that these questions are important but goes on to explain how the visions and policies can be used as a framework to analyze future plans and proposals for transportation in the corridor.

A specific reference to the Major River Crossing Study has been added.

A statement was added showing general support for regional transportation plans except for any elements that conflict with the MNRRA plan.

Transportation infrastructure data provided by the Minnesota Department of Transportation has been added as an appendix to the plan.

3. A policy was added to support the intermodal transportation goals identified in the Federal Intermodal Surface Transportation Efficiency Act, especially the use of mass transportation and bicycle/pedestrian trail linkages.

COMMENTS

4 Railroads have not been specifically discussed in the Plan. We would note that there are nine rail bridges across the river within MNRRA. Further, a number of parallel tracks, and more importantly, rail yards and intermodal shipping terminals are within the MNRRA Corridor. The continued presence of these is very important to the economic well-being of the region.

Again, we think the Plan should not be silent on these facilities. The Plan should reflect an understanding that railroad transportation requires appropriate land use within MNRRA, which can be maintained and upgraded as needed, and that intermodal links are an appropriate land use within the corridor.

Relationship to Other Planning Efforts

5 A serious shortcoming of the Plan is that it fails to indicate how it fits into the comprehensive planning process which characterizes the Twin Cities Metropolitan Area. The law which created the Mississippi National River and Recreation Area contains many references to working with state, regional, and local agencies, and coordinating the efforts of the commission with state, regional, and local planning efforts. Regarding transportation, we do not see this reflected in the Plan. Except for references to barge fleeting, the Plan is very deficient in consideration of transportation. Particularly notable for its absence is any reference to the Major River Crossing Study of the Metropolitan Council of the Twin Cities, and other transportation plans of that body. We urge that

6 closer coordination and consultation between the Commission and the Metropolitan Council be undertaken prior to issuing the final Plan, with particular attention being paid to the transportation plans of that body.

Indirect and Cumulative Effects

7 The Plan is also functioning as a Draft EIS. The nature of the proposal at hand is such to require close examination of indirect and cumulative effects of the proposed action. Indirect effects are those which are caused by the action and are later in time or farther removed in distance, but still reasonably foreseeable. Cumulative effects are those which result from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions.

With the introduction of MNRRA, the Twin Cities now has a wild and scenic river on the east, a major state park and national wildlife refuge on the south, and a major element of the national park service through the middle. Each of these elements impose restrictions on river and land use. We believe that a thorough analysis of the cumulative impacts of these public lands and associated water and land use restrictions upon the land use and economic life of the Twin Cities Metropolitan Area is needed, and must be undertaken prior to developing the Final Environmental Impact Statement for the Mississippi National River and Recreation Area Master Plan.

RESPONSES

4. A statement on railroads has been added (see response to comment G-15-2).

5. Statements were added to the introductory and partner roles sections of the comprehensive plan to indicate how the MNRRA plan fits into the metropolitan area planning process.

6. A reference to this document was added.

7. Indirect and cumulative impacts were assessed, and where it was possible to state them with some degree of certainty, they were included in the environmental consequences section.

The influence of the river extends far beyond the boundaries of the corridor, but reaches to the Dakotas and beyond, and to the Gulf of Mexico. We in Minnesota often tend to think of resources of the state as "our" resources. This type of thinking typifies the draft Plan/EIS. We should not pretend that restrictions on river use and adjacent land use will end with the defined borders of the National River and Recreation Area, or that they would affect only a few river related transportation companies. As indicated above, this river has significant import on the national economy, and the economy of the upper midwest. Restrictions or limitations on such factors as barge fleeting, airport facilities, rail, truck or automobile movement will reach far beyond the MNRRA corridor, and have the potential to adversely affect interstate commerce. We do not see this sort of discussion in the Plan, and believe it is imperative.

These general comments are expanded on the following pages, with comments focused on specific features of the Plan.

I appreciate the opportunity to comment on the Draft Master Plan and EIS. Mn/DOT looks forward to working with the Commission and staff to produce a Plan which will insure that all the important natural and recreational resources of the corridor are protected while at the same time not jeopardizing economic vitality.

Yours truly,

James N. Denn
Commissioner

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Minnesota Department of Transportation
Detailed Comments
Draft Comprehensive Management Plan
Environmental Impact Statement
Mississippi National River and Recreation Area
August 19, 1993

Purpose and Visions for the Area

8 **Page 11:** Mn/DOT supports the vision that residents and visitors will be able to traverse the entire length of the corridor by foot and bicycle. While it may not be possible to have a continuous trail system immediately adjacent to the river for the entire length of the corridor, it is important to have a continuous trail system as close to the river as is practical.

Detailed Policies:

9 **Page 23:** The proposed plan specifically mentions road, trail, and waterway transportation modes. The plan fails to make specific policy recommendations for railroads and airports, two other transportation modes within the corridor. These modes need to be treated in a similar fashion to existing land uses within the corridor and riverfront area which the Plan acknowledges can maintain and upgrade their facilities.

In addition, the proposed site development policies are specific requirements based upon resource protection goals. It is redundant to require that expansion be consistent with both resource protection and site development policies. Also, there is no basis to deny expansion of a facility that is in compliance with all site development policies. Mn/DOT requests that the last sentence on page 23 be changed to read:

10 The plan would also allow ~~business and industries~~ existing land uses in the corridor to expand existing facilities if the expansion is consistent with ~~resource protection and~~ site development policies.

11 To the extent that proposed detailed policies and specific site development policies would be inconsistent with maintenance and upgrading needs at Holman Field, Minneapolis-St. Paul International Airport, and the extensive railroad network within the corridor, the DEIS fails to address the social, economic, and environmental impact which would result from the Plan. A Supplement to the DEIS would be required to adequately identify these impacts.

Location Policies;

Page 24-25: Location policies are intended to apply to new developments within the riverfront area. A land use for which location in the riverfront area is vital, but not

A-1

8. Comment noted.

9. A statement was added identifying railroads as long-standing traditional uses in the corridor. Airports, while having a shorter history in the corridor, preexisted the establishment of the Mississippi National River and Recreation Area and are generally recognized as an important contributor to the Twin Cities economy. Based on what is known about the dual track airport planning process, there is nothing in the draft plan that would automatically exclude a new airport or prevent expansion of the existing airport (as contended in some comments).

10. The first suggested change was incorporated. The second would lose part of the intent of the statement, as compliance with both resource protection and site development policies is desired. A statement was added to clarify this.

11. No such inconsistencies have been identified.

included as an example of an acceptable use, is bridges crossing the river and associated approaches. Appendix C, in the bluff guidelines, acknowledges the appropriateness of bridge approach construction. If the intention of the Plan is to discourage or prevent new bridge crossings and associated approach work, then the DEIS fails to adequately address the social, economic, and environmental impacts of such a policy. A supplement to the DEIS would be required. Refer to our comments on page 29, policy #11. We request that the following be added to the examples of uses acceptable along the riverfront:

12

13 - bridges and their associated approach roads, rail, or trail.

Page 24-25: Another specific river related use not mentioned in the proposed location policies is seaplane use of the river, and associated seaplane bases within the riverfront area. We request that the following be added to the examples of uses acceptable along the riverfront:

14 - seaplane bases and associated aviation facilities

Site Development Policies;

Page 26: Appendix C contains an exception for construction of approach roadways for bridges in bluff areas. A number of the site development policies, such as those concerning bluffs, are designed to prevent inappropriate parallel development and cannot be reasonably applied to approach roads. We request that the following sentence be added at the beginning of the site development policies:

15 None of the these site development policies shall be interpreted to prohibit the construction, reconstruction, or maintenance of bridges crossing the river, and their associated approach road, rail or trail.

Page 29: Proposed policy #11 properly acknowledges the role of metropolitan planning in future transportation decisions on the need for upgraded or new crossings of the Mississippi River. However, the language lacks precision, and allows for an interpretation no new transportation crossings of the river would be consistent with the Plan. If this is the intent of the proposed policy, then the DEIS fails to adequately assess the social, economic, and environmental impact of such a policy. A Supplemental DEIS would be required, which would need to assess:

- The existing river crossings with capacity deficiencies, such as TH 610, I-694, I-94, and I-494

59

12. The plan encourages the use of existing transportation corridors but does not prevent new bridge crossings and associated approach work. It was revised to lay out a process for evaluating new crossings and support the Metropolitan Council River Crossing Study.

13. The subject list was removed from plan.

14. The subject list was removed from plan.

15. This sentence has been added.

- Areas where existing or projected future traffic demands may require additional crossings, such as Anoka and Hastings

- The social, economic, and environmental impacts of perpetuating increasing traffic on a transportation system that lacks capacity

- If land within the MUSA is not developed consistent with Metropolitan Council development guides because of inadequate river crossing capacity, what would be possible effects on growth patterns in the Metro Area?

- The impact upon the Dual Track Airport study, if additional roadway or transit crossings of the river are inconsistent the MNRRA policy

We believe it is appropriate that the Plan leave major investment decisions to those charged with the decisions, at the time such decisions need to be made. The cities along the corridor, the Metropolitan Council, and Mn/DOT can and will make responsible decisions about such matters. Mn/DOT requests that policy #11 be rewritten as follows:

16 (11) New bridge crossings or increasing capacity of existing bridge crossings are consistent with the Plan if they are included in existing or future comprehensive metropolitan area plans.

Page 29: We believe the language in proposed policy #17 has the potential to cause serious transportation problems in the future. The meaning of the phrase, "scenic parkway road design standards." needs to be explicitly defined. Presently its meaning is not specified, and we at Mn/DOT do not know what it means. This phrase must be clearly defined in the Plan itself, or perhaps deleted altogether. This could be construed to place congestion producing limitations on speed over bridges, and carries a clear implication of banning or severely limiting truck movements on these roads and bridges. The impacts of such an interpretation could be seriously detrimental to the economy of the Twin Cities and Minnesota, as well as having adverse impacts on energy use and air quality. The impact of such a policy has not been evaluated in this DEIS. If this is the interpretation, then a revised or Supplemental DEIS would be required to evaluate the social, economic, and environmental impact of decreasing vehicle capacity and rerouting truck movements along and across the corridor. This analysis should include:

- Inventory of all roads within the corridor and their functional classification

- Determination of which roads would be designated as "parkways"

- Determination of which roads would lose capacity

- Determination of alternate routes for trucks

60

16. The policy was revised to address this comment and reflect a priority for alternatives that avoid new crossings while not prohibiting them. To address the desire to minimize river crossings but allow for a flexible policy consistent with the legislative intent for the Mississippi National River and Recreation Area, policy number 11 was revised. It states that if it is necessary to increase river crossing capacity in an area of the corridor, the order of preference would be: (1) to expand the capacity of an existing bridge, (2) to add a parallel structure, and (3) to develop a new crossing corridor if there is no feasible and prudent alternative (including consideration for a greater reliance on intermodal transportation) and if the crossing is included in approved regional transportation plans. A reference to the Major River Crossing Study prepared by the Metropolitan Council was added to the MNRRA plan.

- Determination of additional roadway construction needed for these routes to function at an appropriate level of service

- Evaluation of the social, economic, and environmental impacts of lost roadway capacity and from rerouting truck movements (i.e. increased noise, air emissions, energy use, neighborhood disruption, cost to consumers)

To clarify this interpretation, we request that policy #17 read as follows:

17

(17) Incorporate architectural treatments and extensive landscaping into roadway construction or reconstruction projects, where practical, with primary emphasis on parallel roads in the riverfront area and bridges over the river.

Public Land Ownership, Proposed Policies and Actions;

Page 34: Pedestrian and bicycle access on bridge crossings are desirable and appropriate in most cases. However, there may be situations, (e.g. multiple bridges in a corridor), where each does not need to provide a trail crossing, or where the bridge structure does not lend itself to providing access. Rather than providing a list of possible exceptions to this policy, we recommend that metropolitan comprehensive planning address this issue. We request that policy #6 (also Page 51, #3) be rewritten as follows:

18

...Ensure access across all new and rebuilt bridges when included in existing or future comprehensive metropolitan plans.

61

Page 34: Proposed policy #9 has the potential to have a significant adverse effect on the transportation system within the MNRRA corridor. Transportation corridor right of way often abuts lands acquired with federal recreation grant assistance. Occasionally, transportation improvement projects require minor amounts of right of way from these lands in order to provide increased capacity and/or increased public safety. There are already existing procedural safeguards against unnecessary conversion to non-outdoor recreational use of lands acquired or developed with federal grant assistance. Section 4(f) of the U.S. DOT Act prohibits federal transportation projects from using any recreational land unless there is no feasible and prudent alternative to that use, and only then if the project includes planning to minimize harm to that recreational area. In addition, Section 6-f, requires us to replace any lands acquired or developed with federal recreation grant assistance with land of at least equal value. The National Park Service makes this determination. Therefore, under the existing regulations, there will be no net loss of outdoor recreational land or open space.

17. The riverfront policy was revised to reflect these concerns.

18. The commission and the National Park Service believe it is desirable to encourage pedestrian and bicycle access across all new and rebuilt bridges. However, the policy was revised to refer to publicly funded bridges and specifies that it must be feasible from an engineering and safety standpoint.

If policy #9 is intended to prevent such conversions, then this DEIS inadequately analyzes the impacts of such a policy. A Supplemental DEIS would be required, which would include an inventory all lands which have received federal recreation grants, compare their location to existing and proposed transportation corridors, identify whether transportation safety or capacity improvements would require additional right of way from such lands, determine the impact to public safety from failing to provide such improvements, and what would be the social, economic, and environmental impact from failure to increase capacity or from increasing capacity at alternate locations.

19 Completely adequate legal and regulatory safeguards exist to prevent unwarranted conversion of such lands and facilities, and adequately provide for their replacement. Mn/DOT requests that proposed policy #9 be deleted.

Commercial Navigation

20 **Page 34 - 37:** The description of commercial navigation contained on these pages is not completely accurate. We request that everything after **Commercial Navigation** (page 34) through the second paragraph on page 37 [ending with the words "during the life of the plan"], be deleted and the following substituted:

In the 1930's, the federal government, in an effort to open the midwest agricultural economy to international markets and to create employment and other economic benefits, began the construction of the Upper Mississippi River navigation system. Benefits of the construction of that system and it's locks and dams have spread to many activities beyond just commercial navigation. With the construction of the locks and dams, huge pools of water were formed. These pools provide valuable fish and wildlife habitat and vast expanses of water for recreational use, municipal water supply, and water supplies for a number of industrial and agricultural uses.

Commercial navigation provides an economical, safe, energy efficient, and environmentally friendly form of transportation for millions of tons of freight each year. It provides the Twin Cities region and Upper Midwest with a vital link from the nation's agricultural heartland to domestic and international markets. The terminals in the region are a focal point for shippers that serve a large part of the Upper Midwest. River terminals in the Twin Cities region annually handle 15 to 20 million tons of commodities. The river system provides efficient transportation to and from the region, including:

- grain and mill products shipped to processors throughout the nation's heartland and to export terminals at the mouth of the river near the Gulf of Mexico

62

A-5

19. The policy was revised to address this concern.

20. This text was revised by the Corps of Engineers and the commission to address these concerns.

- other major long-haul southbound shipments including coal, potassic fertilizer, scrap iron, and petroleum coke

- inbound shipments of coal, phosphatic fertilizer, salt, petroleum products, chemicals, cement, steel, and pipe

- large local movements of sand, gravel, and petroleum products

Because of it's energy efficiency, the towing industry provides service to the midwest at costs far below those of other bulk transportation modes. It also helps maintain the competitiveness in the rates of competing modes. Beyond the industry's influence, in the western Dakotas, land transportation rates to export terminals are significantly higher. Towing industry energy efficiencies also produce much lower levels of exhaust emissions and fuel use than do other modes, for the same volumes of freight movement.

Barge traffic levels fluctuate, but maintain an upward trend. Based on those fluctuations, a study done by Temple, Barker, and Sloane, in 1987, projected a leveling out of traffic through the year 2010. Another study (Fruin 1992) based solely on decreased grain movements caused by a loss of the Soviet market, projected even slower growth.

Other studies have projected continuous growth. They include the GREAT 1 study, the Mississippi Master Plan, and the Mid America Ports Study. The most conservative estimates of maritime freight traffic growth on the Upper Mississippi River, in those studies, anticipate a study 2% annual growth over the next 20 years. Following a dramatic drop from 23 million tons in 1984, to just over 16 million tons in 1985, traffic has grown to 19.5 million tons in 1991. The high level in 1984, represents the impact of a severe drought in the eastern corn belt, which forced additional grain purchases from the Minnesota agricultural community served by terminals in the Twin Cities's area. In 1992, the U.S. Army Corps of Engineers recorded the third highest volume of goods movement in history through Lock and Dam 2.

The increased growth in waterborne traffic, which is greater than projected by the two most recent studies of the area's potential, reflects a small increase in grain but major increases in fertilizer, coal, aggregate, and general cargos. For the past 25 years grain terminals on Minnesota's part of the river have contributed an annual average of 7% of the total national grain export volume.

A-6

63

Page 37: The statements in the third paragraph ["Decisions about activity expansion would be based on a balance between desired area resource characteristics and river system capacity. Decisions about commercial navigation uses would be based on resource values, emphasizing minimal impact on aquatic life."] appear to concern commercial navigation uses of the river, rather than commercial navigation land uses within the corridor. Such an interpretation, if enforced, would interfere with the movement of interstate commerce on a navigable waterway. This would be inconsistent with other federal law and is unacceptable.

21

Mn/DOT requests that these statements be deleted and replaced with the following:

> Commercial navigation growth in the Metro area will be based on shippers' increased cargo transport needs. Fleeting growth will be based on the same increased transport needs. New or expanded commercial navigation facility activity will be balanced with concern for other resource values in the corridor through established federal, state, and local environmental review and permitting procedures.

21. The first two sentences in the suggested replacement were not incorporated because they imply that navigation growth will occur based only on market demands, which clearly conflicts with the MNRRA legislation that calls for a program for management of existing and future barge transportation and fleeting activities, which would not be limited to facilities. The legislation is clear in that it states that the plan shall include a program for the management of both land and water uses. To reflect the remainder of the comment, other public comments received on the draft plan, and direction provided by the commission, the two sentences in the draft plan beginning with "Decisions about" were revised (see Commercial Navigation section in the final plan).

Page 38: The statement in the third paragraph from the bottom, "Barges must not present an impediment to navigation..." should correctly read "Moored barges must not present an impediment to navigation..."

22

22. The word "moored" was added.

Natural Resource Management - Pollution

Page 40: The intent of proposed policy #9 is correct, but the wording is flawed and potentially counterproductive. Mn/DOT is currently researching and implementing maintenance practices to significantly reduce the use of salt **and sand** for winter roadway maintenance. Sand can be a worse water pollutant that salt. Street sweeping is costly, energy intensive, generates a disposal problem (rather than preventing pollution), and does nothing to reduce runoff, which is a function of precipitation and drainage patterns. If this Plan intends to increase the use of sand for winter road maintenance, then the DEIS fails to adequately analyze the adverse water quality impacts from such a proposal. We request that policy #9 be rewritten as follows:

> (9) Reduce the use of salt on area roads by encouraging the use of alternative materials and/or increased efficiencies in winter maintenance, commensurate with the needs of public safety.

23

23. The statement has been revised per the comment.

64

ENVIRONMENTAL CONSEQUENCES

Page 158, 164-167: The summary of the environmental consequences of the proposed plan states that there will be only minimal economic impacts from some lost opportunities due to open space acquisition and land use controls. The only impact projected to transportation is a minimal effect to commercial navigation, unless *significant increases in levels of barge fleeting activities are experienced.* There is no mention of any other impact to transportation.

24

APPENDIX - C Erosion Control

Page 210; Proper erosion control measures are vital to preserve the investment of the landowner and the water quality of adjacent lakes, streams and wetlands. Sediment is the largest water pollutant by volume and arguably the most detrimental water pollutant. It is appropriate for this Master Plan to identify a goal of reduced erosion and to require adequate temporary erosion controls during construction and adequate installation and maintenance of permanent erosion controls for all land uses within the corridor. However, erosion control plans must be flexible and designed to fit the requirements of a specific site. No two sites are alike, and no two sites can have exactly the same erosion control plan.

The erosion control guidelines listed in Appendix C, are not guidelines, but are mandatory requirements, since virtually all items are to be adopted in zoning ordinances. These requirements are too prescriptive, too inflexible, and will ultimately be self-defeating to the goals of MNRRA which promote increased water quality and development which minimizes disturbance and blends into the landscape. That fact that an erosion control measure worked once, does not mean it will work everywhere; conversely because a measure didn't work once, does not mean it is never appropriate in any circumstance.

The requirement, "in no instance should fill exceed 4:1 slope," will increase construction limits and the disturbance of the natural landscape. If this statement is meant to say that slopes must be no flatter than 4:1, then this measures increases erosion, rather than controls erosion. The requirement that "Walls should be no higher than 5 feet and should be constructed of wood or natural stone," will also increase construction limits and will insure that somewhere a wall will fail, since these materials are not always appropriate. This results in greater, not lesser erosion.

Mn/DOT requests that these prescriptive and inflexible requirements be deleted from the Erosion Control section of Appendix C. These should be replaced with performance standards, which tell designers what to accomplish, not what they must do regardless of whether it will work. However, several of the items, such as the second and fifth on page 210, are performance standards that are impossible to accomplish.

A-8

65

24. That is all that is expected.

25 Mn/DOT requests that the Erosion Control section be rewritten as follows:

Erosion Control

Erosion and sedimentation should be minimized by:

- Development of an Erosion Control Plan for each site that disturbs greater than five acres.

- Development fitted into the site contours and appropriate to the site soil conditions.

- Natural erosion control devices should be used insofar as practical.

- Structural devices, such as culverts, ditches, and walls should be designed to fit into the natural landscape.

- Adequate erosion control measures should be maintained before, during, and after construction to ensure that soil loss does not degrade adjacent water. Methods to trap sediments should be used.

- Erosion control measures and reestablishment of vegetation should make maximum use of natural vegetation.

- Fill should be stabilized with plant material and fill slopes should blend in with natural surroundings.

- Wetlands and other water bodies should not be used as sediment traps.

- Detention ponds should be used for temporary water storage wherever practical.

- In the design of drainage facilities, consideration should be given to aquifer recharge, particularly by use of porous materials for parking lots and drainage facilities.

Bridges, Powerlines, and Roads

Page 211-212; This section of Appendix C contains two different proposed guidelines concerning the design of bridges in the corridor. Mn/DOT supports the goal of aesthetic bridge design which is appropriate to the surrounding landscape. However, we have several concerns with the proposed guidelines.

25. Some revisions were made, but it must also be stressed that these are only guidelines to show communities how the policies in the plan could be implemented.

First, it is inconsistent with other Plan policies and guidelines in that no similar statements exist for buildings, grain elevators, park facilities, etc. If it is necessary to give examples of bridges, then where are the examples of other structures which impact the corridor?

Secondly, the mandate for only allowing arch bridges will pose severe problems and may be counter-productive to the goals for the MNRRA corridor. The most appropriate bridge for a specific location is influenced strongly by the site. For example, the Lake Street and Ford Bridges are arch bridges due to the availability and close proximity of the bluffs to resist the thrust of the arches. These designs could not be used where the floodplain is wide, such as at Newport. Providing examples which cannot be applied at many locations is misleading and raises false expectations. As an item information, one of the stated examples, the Hennepin Avenue Bridge, is not an arch bridge.

Finally, it must be recognized that a public works project, such as a bridge, must balance the aesthetic requirements of the site, the appropriate engineering solution for a location, and the amount the public can afford to spend in light of statewide needs. Mn/DOT requests that the two guidelines for bridge design be deleted and replaced with the following:

26

- Apply bridge types and architectural treatments appropriate to the site.

Page 211: The proposal that all roads within 300 feet of the river should be limited to scenic drives and parkways providing recreational access is unacceptable. Please refer to our comments on page 29, policy #17. In addition, this plan acknowledges that there are river related business and industries that are appropriate land uses within the riverfront area. This guideline would deny road access to these facilities since they are not "recreational" and therefore is contradictory to the proposed policies contained on pages 23-25.

67

This guideline should be rewritten as follows:

27

Roads within 300 feet of the river should follow these guidelines:
- Design appropriate to the function of the roadway and the surrounding landscape.
- Minimize cut and fill and disturbance of vegetation where practical.
- Design with a curvilinear alignment and to emphasize views where practical.

If it is the intent of this Plan to only allow scenic drives and parkways providing recreational access within the riverfront, then the social, economic, and environmental impacts of the Plan have not been evaluated in this DEIS. A Supplement to, or a Revised DEIS would be required to adequately address these impacts.

A-10

26. The guideline was revised to address this comment.

27. The guideline was revised to address this comment.

The provision prohibiting roads on slopes greater than 12% has been addressed in the section on Bluffs. This provision should be deleted in this section. If these guidelines must be redundant, then include the exception for bridge approaches, so that these guidelines are consistent.

Conclusion

Our detailed comments on the proposed policies and design guidelines note potential interpretations which would have significant adverse impacts to the transportation system within the MNRRA corridor, which would indirectly cause significant adverse impacts to the economy of the region. Our belief is that neither the Commission nor the National Park Service would wish these policies and guidelines interpreted in a manner to cause adverse effects to the transportation system or the economy which is dependent upon that system. Our suggested language changes, if incorporated into the Final Plan and EIS, would remove the possibility of extreme interpretations of these policies and guidelines. However, if these suggested changes are not incorporated, and the potential for extreme interpretations remains, then it would be our belief that the DEIS does not adequately address the potential impacts of the proposed Plan. In that case, we believe a revised DEIS or a Supplement to the DEIS would be needed, which would fully disclose those impacts.

Minnesota
Department of Transportation
Transportation Building
395 John Ireland Boulevard
Saint Paul, Minnesota 55155

September 9, 1993

JoAnn Kyral, Superintendent
Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418, Box 41
St. Paul MN 55101

SUBJECT: DRAFT COMPREHENSIVE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT

Dear Ms. Kyral:

On August 19, 1993, The Minnesota Department of Transportation forwarded detailed comments on the Draft Comprehensive Management Plan and Environmental Impact Statement for the Mississippi National River and Recreation Area (MNRRA).

In that letter we stressed the critical importance of the Mississippi River and adjacent lands as a transportation corridor. The attached information provides illuminating quantitative information on that point. Attached are data on railroad tonnage moved, vehicle and truck average annual daily traffic, river barge tonnage, and aircraft operations within the MNRRA corridor. These numbers underscore our concern that restrictions on commodity movement or personal travel would have severe effects on the social and economic environment of the Twin Cities. We believe the attached information will be useful to you in revising the draft plan and preparing the final plan and EIS for review by Governor Carlson and Secretary Babbitt. 69 28

Please attach this to our earlier letter in the public comment record for the MNRRA plan and EIS.

Yours truly,

James N. Denn
Commissioner

28. The information was added as an appendix.

THE MNRRA CORRIDOR: SELECTED TRANSPORTATION DATA

RAILROAD BRIDGE ANNUAL TONNAGES*

	RAILROAD	BRIDGE LOCATION	ANNUAL TONNAGE (millions)
1)	Chicago, Milwaukee, St.Paul & Pac./Soo Line	Mile 813.7(Hastings)	43.4
2)	Chicago Northwestern	Mile 835.7	15.0
3)	Chicago Northwestern	Mile 839.3 (Robert Street)	5-10
4)	Chicago Northwestern	Mile 841.4	9.4
5)	Chicago, Milwaukee, St.Paul & Pac./Soo Line	Mile 850.7	3-5
6)	Chicago, Milwaukee, St.Paul & Pac./Soo Line	Mile 853 (near Washington Ave.)	3
7)	Burlington Northern	Mile 854.5	3
8)	Burlington Northern	Mile 855.8	65
9)	Soo Line	Mile 857.6	22.7

TOTAL ANNUAL RAILROAD BRIDGE TONNAGE IN THE MNRRA CORRIDOR: 169.5 - 176.5 MILLION TONS

*These 1992 railroad tonnages gathered through the Minnesota Department of Transportation analysis system.

ANNUAL AVIATION OPERATIONS
FACILITIES WITHIN OR ADJACENT TO THE MNRRA CORRIDOR

FACILITY	OPERATIONS
HOLMAN FIELD	152,378
FLEMING FIELD	39,800
MSP INTERNATIONAL	415,902
TOTAL OPERATIONS	608,080

TOTAL FREIGHT TONNAGE AT INTERNATIONAL AIRPORT: 335,339 tons

ROADWAYS IN THE MNRRA CORRIDOR
AVERAGE DAILY TRAFFIC VOLUMES 1992*

LOCATION	TRAFFIC VOLUME
Minneapolis (East Side of River)	
T.H. 169/10 (North of Anoka)	37,900/ 1,800
East River Road	18,000/ 540
I-94 from Emerald to Oak St.	119,000/3,570
University Ave. S.E.	20,600/ 618
Oak Street	9,100/ 273
Minneapolis (West Side of River)	
I-94 from Fridley to 42nd Ave. N.	96,000/ 2,880
Washington Ave. N.	34,300/ 1,029
Riverside Ave.	12,600/ 378
Marshall Ave.	8,900/ 267
Hiawatha Ave.	42,000/ 1,260
T.H. 5 (near Airport)	48,000/ 1,440
St. Paul (East Side of River)	
Shepard Rd.	23,000/ 625
Warner Rd.	15,500/ 465
Kellogg Blvd.	33,000/ 990
Cleveland Ave.	4,800/ 144
McKnight Rd.	3,900/ 117
Carver Ave.	850/ 26
I-494 to Maxwell	44,000/ 1,320
Maxwell Ave.	6,200/ 186
4th Ave. (Newport)	4,800/ 144
Grey Cloud Island Dr.	4,500/ 135
T.H. 61	41,500/ 1,450
T.H. 10	9,000/ 300
St. Paul (West Side of River)	
Water Street	600/ 18
Plato Blvd.	14,300/ 429
T.H. 3 (Lafayette Rd.)	41,000/ 1,230
T.H. 13	9,900/ 297
Butler	3,100/ 93
T.H. 56 (Concord)	14,000/ 420
Inver Grove Trail	1,600/ 48
T.H. 52	24,500/ 3,000
T.H. 55	9,200/ 660

TOTAL AVERAGE ANNUAL DAILY HIGHWAY TRAFFIC
IN THE MNRRA CORRIDOR: 755,650 VEHICLES

TOTAL AVERAGE ANNUAL DAILY HEAVY COMMERCIAL TRAFFIC
IN THE MNRRA CORRIDOR: 26,152 VEHICLES

*These 1992 traffic numbers gathered through the Minnesota Department of Transportation analysis system. The first number represents the average daily traffic on the roadway in the MNRRA corridor. The second number represents the heavy commercial (truck) portion of the first number.

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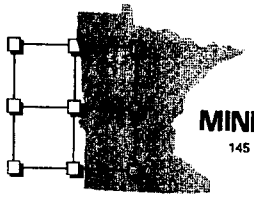
MNRRA CORRIDOR
AVERAGE DAILY HIGHWAY BRIDGE TRAFFIC 1990/1991

HIGHWAY	LOCATION	TOTAL TRAFFIC/TRUCK TRAFFIC*
1) T.H. 10/61	Mile 813.9	23,000/ 1,175
2) County Rd. 22	Mile 830.3	4,200/ 126
3) I-494	Mile 832.4	62,000/ 4,900
4) T.H. 3 (Lafayette)	Mile 838.8	59,000/ 3,000
5) T.H. 52 (Robert St.)	Mile 839.2	16,000/ 600
6) T.H. 56 (Wabasha St.)	Mile 839.5	16,000/ 480
7) T.H. 49 (High Bridge)	Mile 840.4	15,500/ 425
8) I-35E	Mile 843.3	55,000/ 1,800
9) T.H. 5 (Fort Snelling)	Mile 845.6	49,500/ 2,300
10) T.H. 55 (Mendota)	Mile 1.7 (Minnesota R.)	29,000/ 2,100
11) I-494	Mile 4.1 (Minnesota R.)	51,000/ 3,500
12) Ford Parkway	Mile 847.6	14,500/ 435
13) T.H. 212 (Marshall Ave.)	Mile 849.9	14,500/ 435
14) Franklin Ave.	Mile 851.5	9,500/ 285
15) I-94	Mile 851.7	115,000/ 7,100
16) Washington Ave.	Mile 852.6	25,000/ 750
17) I-35W	Mile 853.2	113,000/ 6,800
18) T.H. 8 (3rd Ave.)	Mile 854.1	18,600/ 558
19) T.H. 12 (Hennepin Ave.)	Mile 854.3	22,000/ 660
20) Plymouth Ave.	Mile 855	8,300/ 249
21) Broadway Ave.	Mile 855.4	18,300/ 550
22) Lowry Ave.	Mile 856.4	19,000/ 570
23) Camden Ave.	Mile 857.8	23,500/ 705
24) I-694	Mile 860.4	100,000/ 8,400
25) T.H. 610	Mile 865	46,000/ 1,800
26) T.H. 169	Mile 871.6	32,500/ 675
TOTAL AVERAGE DAILY TRAFFIC VOLUME		959,900/43,378

*Traffic numbers gathered through the Minnesota Department of Transportation analysis system. The first number represents the average daily traffic across the bridge. The second number represents the heavy commercial (truck) portion of the first number.

1992 RIVER BARGE TONNAGE IN THE MNRRA CORRIDOR: 15,422,492 tons

This tonnage figure includes traffic passing through Lock and Dam #2 at Hastings and the local metropolitan traffic of sand, gravel and petroleum products.



MINNESOTA STATE COUNCIL ON DISABILITY

145 Metro Square Building • 7th Place and Jackson Street • Saint Paul, Minnesota 55101
(612) 296-6785 or Toll-free 1-800-652-9747, Statewide, (Both are Voice and TDD)

August 24, 1993

Ms. JoAnn Kyral, Superintendent
U.S. Department of Interior
National Park Service
Mississippi National River and Recreation Area
175 Fifth Street East, Suite 418
Box 41
St. Paul, MN 55101-2901

Dear Ms. Kyral:

The topic of accessible outdoor facilities is a new, currently undefined and rapidly developing area of concern. The developing philosophy is the provision and definition of varying levels of accessibility. The differing levels of accessibility would present a different challenge level based on the amenities provided and the natural lay of the land.

At this time, it appears that four levels of accessibility will be defined. Level 1 will be a fully accessible level which complies with current accessibility guidelines, has gentle slopes and paved walkways. Level 4 is designed to be a natural, undeveloped area which would require significant assistance for individuals with disabilities to negotiate.

It is anticipated that interpreter centers, other physical structures and surrounding areas, such as parking facilities and connecting walkways, would provide a degree of accessibility in accordance with level 1. Pathways could vary between access levels 1, 2 and 3 (pathways with slopes in excess of 1:12 (8.33%) should be avoided). Signage indicating the access level of adjoining areas should be readily available to persons so that they are able to determine the degree of challenge or experience they desire to undertake.

We are an equal employment opportunity employer.

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COMMENTS

It has been noted that although the draft plan for the Mississippi National River and Recreation Area specifically states that accessibility guidelines will be followed in the development and construction of the MNRRA, some of the drawings included in the document show areas with stairs only. Access level I pathways and walkways should be provided in addition to, or in place of, the stairs. 1

The Minnesota State Council on Disability has devoted a considerable amount of time to the topic of accessible outdoor sites and facilities. We would be happy to offer additional assistance and input on the development of the MNRRA as the project progresses. Please feel free to contact the Council with questions and concerns.

Sincerely,

Clell Hemphill
Executive Director

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RESPONSES

1. A note was added to the drawing explaining that it is a concept only and accessible walks would be incorporated at the design stage. The section of the plan entitled "National Park Facilities in the Corridor" was revised to further emphasize that all NPS facilities would be fully accessible as required under established law and agency guidelines. The National Park Service would also encourage full compliance with accessibility standards in facilities developed by local governments in the corridor.

METROPOLITAN COUNCIL
Mears Park Centre, 230 East Fifth Street, St. Paul, MN 55101-1634 612 291-6359 FAX 612 291-6550 TTY 612 291-6

TRANSPORTATION ADVISORY BOARD

August 24, 1993

JoAnn M. Kyral, Superintendent
Mississippi National River and Recreation Area
175 East Fifth Street
Suite 418, Box 41
St. Paul, Minnesota 55101

Re: Draft Comprehensive Management Plan, Mississippi National River and Recreation Area

Dear Ms. Rietow:

The Transportation Advisory Board of the Metropolitan Council has completed a preliminary review of the Draft Comprehensive Management Plan Environmental Impact Statement for the Mississippi National River and Recreation Area. Because of your rather brief review period, we are sending comments directly to you as well as to the Metropolitan Council. We understand the Council will submit comments after your September 10 deadline. There are several transportation items in the Draft Plan that could have a significant impact on the Region's transportation system. We want to make sure we meet your deadline so that our comments receive full consideration. They are as follows:

1 1. The MNRRA Plan has not adequately addressed transportation issues relative to the relationship between the functions of the designated river corridor and the region's transportation system as defined in the Metropolitan Council's Transportation Guide/Policy Plan and the Aviation Development Guide Chapter.

2 2. The MNRRA Plan does not acknowledge the Major River Crossing Study updated by the Council and the TAB in 1989 which assigns a high priority to reconstruct many Mississippi River crossing points (TH 169 in Anoka, TH 61 at Hastings, I-494/Wakota, and Wabasha Street are in the top 10 in the list of priorities).

3 3. The policies, parkway and bridge crossing standards listed on pages 24 and 29 are in conflict with the recommendations of the Major River Crossing Study and the Metropolitan Highway System Plan classification of Shepard Road.

4 4. The MNRRA Plan does not consider the directives of the federal Intermodal Surface Transportation Efficiency Act (ISTEA) to integrate intermodal planning in the management of transportation infrastructure. For instance, ISTEA promotes greater linkages between modes at terminal locations such as airports, ports, rail facilities, barge and grain terminals. All these uses have historically and will need to continue to occur in the river corridor.

5 5. The MNRRA Plan comment period should be extended by at least 30 days to allow local governmental units and others an opportunity to review the comments submitted by the Council and the Minnesota Department of Natural Resources (DNR).

Recycled Paper

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1. This is beyond the scope of the plan (see response to comment G-15-2).

2. A reference has been added.

3. The policies have been revised to address these concerns and a statement has been added supporting the metropolitan transportation planning process, including the river crossing study.

4. A reference to the Intermodal Surface Transportation Efficiency Act has been added.

5. The extension was granted.

COMMENTS

August 24, 1993
Page 2
Ms. Kyral

6 6. The MNRRA Plan should include a schedule and description of the National Park Service process to revise the draft plan and any future opportunities to comment on the Plan and other related implementation documents.

7 7. A section should be added that clearly defines the anticipated roles and responsibilities of the National Park Service, local government units affected by the corridor designation, the Council, DNR and other state and federal agencies to implement the MNRRA Plan.

8 8. As part of the process to define the MNRRA Plan implementation roles and responsibilities of the National Park Service, local government units affected by the corridor designation, the Council, DNR and other state and federal agencies to implement the MNRRA Plan.

9 9. The MNRRA Plan does not provide adequate direction such as clearly defined strategies to address land use conflict issues given the diversity of land uses that exists in the corridor. The response to these types of land use issues in the draft plan is very general and would be subject to interpretation if adopted.

10 10. An inventory of the existing and planned major transportation infrastructure improvements should be conducted as part of the planning study.

We plan to finalize our comments by September 15 and will forward them through the Metropolitan Council or directly to you whichever is the most feasible at the time.

Sincerely,

Sally Evert

Sally Evert
Chair, Transportation Advisory Board

SE:jlm

cc: Dottie Rietow
Chair, Metropolitan Council

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RESPONSES

6. A discussion of the process to amend the plan was added, including a commitment for public involvement.

7. Considerable material was added to the plan in appropriate places to clarify roles and responsibilities (see especially the Partner Roles section).

8. The implementation roles were clarified in the draft final plan.

9. The comprehensive management plan is a policy plan. It is meant to be a framework and serve as a guide; it is not intended to serve as a rigid set of rules for land use or to provide precise direction on all the site-specific land use issues in the corridor.

10. Some Department of Transportation information has been added as an appendix.

MARK ANDREW
CHAIR

PHONE 612/348-3080
FAX 612/348-8701
TDD 612/348-7706

BOARD OF HENNEPIN COUNTY COMMISSIONERS
A-2400 GOVERNMENT CENTER
MINNEAPOLIS, MINNESOTA 55487-0240

August 31, 1993

Ms. JoAnn M. Kyral, Superintendent
Mississippi National River & Recreation Area
175 East Fifth Street, Suite 418
Box 41
St. Paul, MN 55101

Dear Ms. Kyral:

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The Hennepin County Board of Commissioners and its staff have reviewed the Draft Comprehensive Management Plan and Environmental Impact Statement prepared for the Mississippi National River and Recreation Area by the Mississippi River Coordinating Commission. Based on our review and discussion of the Draft Plan, I'd like to offer the following review comments on behalf of the County Board.

First, the Board appreciates the opportunity to comment on the Draft Plan. We recognize the vulnerability of the Mississippi River and its basin to the combined effects of state, regional and local government plans and policies and the multitude of public and private activities they permit. We also recognize the necessity of forging a partnership among public jurisdictions throughout the river corridor to ensure that appropriate and balanced use, development and protection occurs throughout the area.

We believe that the Draft Plan contains a sound process for intergovernmental collaboration and a practical framework for balancing resource protection, use and development. It does not appear that Plan implementation would have adverse environmental impacts within Hennepin County or impede execution of County plans for transportation, environmental, recreational, health or other services. While generally supporting the Plan's process, facility and policy provisions, we would also request your consideration of the following issues and concerns when preparing the Final Plan.

1

1. The site development policy in the Proposed Plan calling for increasing "capacity of existing bridges and developing parallel architecturally compatible bridges next to existing bridges...instead of new, separate bridges" may be too inflexible. We believe that

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1. The statement has been revised. See response to comment G-15-16.

COMMENTS

capacity expansion of existing bridges, and parallel construction of additional spans, are preferred alternatives to new bridges and new bridge corridors when such approaches will satisfy transportation needs. However, given the continuing growth and shifting distribution of the region's population and transportation patterns, the future may require additional bridges and/or bridge corridors. We believe the Plan should anticipate future needs and support whatever actions may be necessary to address these needs, including new bridges and bridge corridors, should other measures prove inadequate.

2 2. The Plan does not make any specific reference to future development of light rail transit within the metropolitan area. While any such future development would principally occur outside of the MNRRA, and development within the area would presumably follow locational and site development policies of the Plan, specific provision should be made in the Plan for light rail transit variances that may be necessary in the future. The extension of such variances could facilitate light rail development which, in turn, will enhance the attainment of a variety of Plan objectives including greater access to corridor resources and reduced levels of environmental pollution.

3 3. The Plan should make specific provision for identification and cleanup of landfill sites along the River. These landfills could present hazards to the public or delay various recreational and other uses proposed in the Plan. In addition, several of these sites, such as the abandoned landfills on Veterans Administration property and former federal land now known as Fort Snelling State Park, were created under federal auspices and should be a federal cleanup responsibility. To date, there has been little effort on the part of the responsible federal agencies to undertake a complete investigation and remediation. The Final Plan should clearly establish federal responsibility for cleanup of these landfills.

I appreciate this opportunity to comment and hope the Final Plan will reflect these concerns. We look forward to working with the Coordinating Commission and the other local units of government within the MNRRA to implement the Final Plan and ensure that the Mississippi River basin that we share is carefully developed and vigorously protected for the foreseeable future.

Sincerely,

Mark Andrew,
Chair

RESPONSES

2. This issue was not identified during scoping for the plan. However, a statement was added supporting the Intermodal Surface Transportation Act and its emphasis on intermodal transportation.

3. Landfill sites were added as an example of lands that should be cleaned up under the pollution control policies.

HENNEPIN PARKS
"Yours to Enjoy Naturally!"

Suburban Hennepin Regional Park District
12615 County Road 9
Plymouth, MN 55441-1248
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Fax (612) 559-3287

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St. Anthony
[illegible] Kay Reuther
[illegible]ymouth
[illegible]arcia Tauber
Hopkins

Douglas F. Bryant
Superintendent and
Secretary to the Board

79

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September 8, 1993

Mr. Peter Gove, Chair
Mississippi River Coordinating Commission
c/o JoAnn Kyral, Superintendent
Mississippi National River & Recreation Area
National Park Service
175 Fifth Street East
Suite 418, Box 41
St. Paul, MN 55101

Dear Mr. Gove,

Hennepin Parks has appreciated the opportunity to be involved in the development of the Mississippi National River & Recreation Area (MNRRA) planning process and to comment on the draft Management Plan/EIS. The Hennepin Parks Board of Commissioners adopted a motion at the September 2, 1993 Board meeting, asking that I submit comments on behalf of the Park District. We hope that consideration of these comments will help to strengthen the MNRRA Plan. The Park District recognizes the importance of the MNRRA Plan and also the difficulties in coordinating with so many existing agencies with such a variety of interests and authority levels over MNRRA corridor resources and activities. Hennepin Parks mission, consistent with many MNRRA goals, exclusively deals with the protection and enjoyment of natural resources and provision of outdoor recreation and education opportunities and has a long and reputable tradition of managing its Mississippi River resources as well as all of our park resources in pursuit of this mission.

Hennepin Parks greatest area of concern with the MNRRA Management Plan is the lack of reference to the problems at the Coon Rapids Dam. Hennepin Parks Board of Commissioners strongly believe this lack of acknowledgment is a weakness in the Plan and could be construed as an intentional oversight due to the controversial and difficult nature of the issue. The MNRRA Management Plan references the positive recreation and resource benefits created by the existence of the Dam as well as its economic and historic heritage. Yet it takes no position as to whether the dam should be saved or removed. I believe the Plan takes it for granted that the Dam and these benefits will be maintained within the corridor - which may not be the case, unless a coordinated, multi-level government approach (including the National Park Service) to address this problem is implemented. The possible loss of the recreational amenities provided by the Coon Rapids Dam is of great concern to citizens, cities and selected representatives of the northern communities along the MNRRA Corridor. The cities of Champlin and Anoka have passed a resolution opposing removal of the Dam and expressing a strong desire for this issue to be looked at on a board scale (See Attached Resolutions).

In addition to Hennepin Parks overriding concern for the Coon Rapids Dam relationship to the MNRRA Management Plan, please note the following summary of Hennepin Parks comments within MNRRA policy area:

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1. The intent of the plan is to provide comprehensive visions and policies that should be useful in resolving these kinds of issues as they develop over the next 10-15 years. The text of the plan was further revised to state that site-specific issues are very important, to clarify how the plan can be used to address these issues in the future, and to underscore how the commission could serve as a forum to discuss and help resolve these issues. As stated in previous responses, the plan is not intended to be site specific.

Land and Water Use Policies

2 Hennepin Parks interpretation of the proposed land use policies leaves the Park District with the understanding that property currently designated as parks and open space within the Corridor would be maintained in that capacity and local units of government would be asked to amend land use plans to reflect this directive. The Plan also establishes a 300' setback requirement in which only certain types of developments would be authorized. Hennepin Parks is concerned that these policies may negatively affect our ability to deal with the repair of the Coon Rapids Dam. This is a unique situation and should be acknowledged as a possible exception

As background information the Park District is faced with a large repair bill on the Coon Rapids Dam. The Coon Rapids Dam was given to Hennepin Parks by Northern State Power Company in 1969 along with property on both the east and west sides of the Dam with no restrictions of use. If repairs of the Dam and walkway are feasible, the Park District must identify a funding strategy to cover these costs. Currently, the financial responsibility for the Dam is solely that of suburban Hennepin taxpayers, whose benefit is extremely limited when compared to the regional, statewide, and now national benefit the structure provides. It is possible that Hennepin Parks may be faced with selling property, currently in parks and open space status, on the east side of the Coon Rapids Dam in order to fund a portion of the repair costs. If a decision is made to sell property and it is not purchased by another government entity, this land may need to be sold for another purpose, such as residential or commercial use. Hennepin Parks recommends that the Plan identify this possible change in land status, or in some other way assist in providing in the funding for the Dam repair and walkway construction.

Open Space and Trails Policy

3 The protection of open space and development of trails are major considerations in the Management Plan. The Plan identifies Hennepin Parks as a provider of both. What is missing from the Plan is the importance of continuing the connection between the east and west sides of the river over the Coon Rapids Dam. This connection is consistent with the Plan objectives from a trail perspective as well as linking interpretive facilities. Hennepin Parks recommends that the Management Plan include a specific reference of the desire to maintain a connection between regional trail systems and parks on the east and west sides of the Coon Rapids Dam Regional Park as part of or adjacent to the dam structure.

Resources Management Policies

Hennepin Parks, for the most part, applauds the proposals of the MNRRA Plan for natural resource protection activities, including water quality management; however, we question the effectiveness of the cooperation among the existing water quality management agency programs. Isn't it time to advocate a bold new action aimed at improving river water quality? The current regulatory environment regarding water quality in the metropolitan area is confusing to say the least. This plan provides an opportunity for an aggressive approach that could then be monitored by the designated agencies.

2. See responses to comments G-8-7 and G-10-1.

3. See response to comment G-22-1.

4 Within Resources Management Policy 3, Hennepin Parks recommends that the public sector be included in the groups needing education regarding pollution prevention. Likewise in Policy 6, public sector entities should also be targeted with educational information. Often public sector agencies can be significant contributors to these problems.

Visitor Use and Interpretation Policies

The Coon Rapids Dam was recognized early on in this section for its contributions to the River Corridor. "People now enjoy a wealth of recreation, education and contemplative activities in the Corridor. The Coon Rapids Dam attracts anglers and other river users from spring to fall. The river above the dam offers good boating and fishing." Again, the MNRRA Management Plan should

5 identify what resolution needs to be developed in order to maintain the recreational and educational opportunities that is credited as a positive benefit on the Corridor. It seems that these recreational amenities are very desirable; but, strategies need to be identified within the Plan which would address the realities of providing such amenities.

Hennepin Parks acknowledges the National Park Service's role in the provision of visitor and interpretive services and welcomes the opportunity to coordinate services at Coon Rapids Dam Regional Park. Land and facilities on the east side of the river are owned by Hennepin Parks and leased to Anoka County. This fact should be made clear in the Plan. Again, the desirability of maintaining a walkway to connect these visitor stations/interpretive facilities should be promoted within the Plan.

6 Additionally, Hennepin Parks recommends that the Plan address to a greater extent winter recreation opportunities such as cross country skiing, walking on packed trails and snowshoeing. It seems that little or no attention is paid to winter recreation opportunities in the Corridor.

General Development Policies

The Plan stresses the partnership roles between other public entities and the National Park Service in the management of the Corridor. Roles are established for the Coordinating Commission, the National Park Service, the Metropolitan Council, the Department of Natural Resources, the Corps of Engineers, and local units of Government. A 50% matching grant program is proposed to assist local units of government with developments that would meet Plan objectives. Hennepin Parks

7 supports this initiative and considers funding for this program a high priority. If a request is made to Congress to fund Plan recommendations, consideration should be given to staging the interpretive facility funding requests in a manner that simultaneously ensures funding for local initiatives within the Corridor.

Again, Hennepin Parks is sensitive to the complexities and political realities of developing a Management Plan that affects so many public and private entities. Without the support of these entities, the Plan will not become a viable opportunity. We are proud of the National River and Recreation Area designation for the Mississippi River in Minnesota and support efforts to wisely manage this resource and make it available for public enjoyment.

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4. These were added.

5. The plan emphasizes recreational and educational visions and policies but is not site specific.

6. This was added.

7. A statement was added saying that the grant program for acquisition and development is a high priority. Funds would be sought to implement all proposals in the plan.

-4-

I am available to address the issue of the Coon Rapids Dam with the Coordinating Commission, if you feel a presentation would be valuable in considering Hennepin Parks comments on the MNRRA Management Plan. Thanks again for allowing the Park District to participate in the formulation of the Mississippi River Management Plan.

Sincerely,

Douglas P. Bryant, Superintendent
and Secretary to the Board

cc: JoAnn Kyral, MNRRA Superintendent
Hennepin Parks Board of Commissioners

sh4/mnrra

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Office of the Mayor

September 8, 1993

JoAnn M. Kyral, Superintendent
Mississippi National River & Recreation Area
175 East Fifth Street, Suite 418, Box 41
St Paul, MN 55101-2901

RE: Draft Comprehensive Management Plan and Environmental Impact Statement for Mississippi National River and Recreation Area

Dear Superintendent Kyral:

Please accept the enclosed Resolution No. 93-85, adopted by the Coon Rapids City Council on September 7, 1993, as comments from the City of Coon Rapids on the draft Comprehensive Management Plan and Environmental Impact Statement for the Mississippi River National River and Recreation Area. I am also enclosing a copy of the September 7, 1993 City Staff report on the draft Plan and Environmental Impact Statement.

Thank you for your consideration. The City of Coon Rapids looks forward to a positive and responsive reaction from the Mississippi River Coordinating Commission and the National Park Service regarding our concerns. If you have any questions or desire further information please do not hesitate to call Lee Starr at 780-6460.

Sincerely,

William F. Thompson

William F. Thompson, Mayor
City of Coon Rapids

Enclosures

cc: Mayor William Nee, City of Fridley
Vern Peterson, Association of Metropolitan Municipalities
Councilmember John Weaver, City of Anoka

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COMMENTS

RESOLUTION NO. 93-85

RESOLUTION COMMENTING ON COMPREHENSIVE MANAGEMENT PLAN FOR MISSISSIPPI RIVER NATIONAL RIVER AND RECREATION AREA

WHEREAS, the Mississippi River Coordinating Commission and the National Park Service have prepared a draft Comprehensive Management Plan for the Mississippi National River and Recreation Area (the "MNRRA Plan"); and

WHEREAS, the City Council has reviewed the MNRRA Plan and wishes to offer comments on it.

NOW, THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF COON RAPIDS, MINNESOTA:

1. Given the fully developed Mississippi River corridor in the City; the effective application of Mississippi River Critical Area regulations in this corridor by the City; and evaluation of the implications of the MNRRA Plan preferred alternative for the City; the City Council concludes that the MNRRA Plan provides no direct and measurable benefits to the City. Therefore, the City of Coon Rapids supports Alternative A-No Action under the MNRRA Plan.

2. The City Council has the following comments and concerns about the preferred, balance use and preservation needs, alternative in the MNRRA Plan:

1 A. The proposal fails to provide explicit and unqualified policy support to allow existing buildings with setback or height nonconformities, relative to proposed development standards, to be rebuilt on the same footprint.

2 B. The proposal should address the significant issue of the condition of the Coon Rapids Dam and possible state or federal initiatives or assistance to preserve or enhance the Dam.

3 C. Preparation and adoption of local Comprehensive Plan amendments and regulations consistent with the proposal constitute an unnecessary mandate with local government costs that would not be compensated by state or federal sources.

4 D. The City appreciates the acknowledgement by the proposal that it is not feasible to acquire a continuous open space corridor along the upper river due to extensive residential development. This is responsive to previous Coon Rapids concerns.

ADOPTED BY THE COON RAPIDS CITY COUNCIL THIS 7TH DAY OF SEPTEMBER,1993

William F. Thompson
William F. Thompson, Mayor

Attest:

Betty Backes
Betty Backes, City Clerk

RESPONSES

1. The provision was revised and clarified to state that nothing in the plan would restrict this and existing federal, state, and local laws would apply.

2. See response to comment G-22-1.

3. The plan was clarified to explain that funds would be requested to support this activity and it would be a high priority for implementation.

4. Comment noted.

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TO: Mayor, City Councilmembers, City Manager

FROM: Lee Starr, Community Development Director

SUBJECT: Draft Comprehensive Management Plan and Environmental Impact Statement for Mississippi National River and Recreation Area

DATE: September 7, 1993

INTRODUCTION

The Mississippi River Coordinating Commission and the National Park Service have prepared a draft Comprehensive Management Plan and Environmental Impact Statement for the Mississippi National River and Recreation Area (MNRRA) and requested public comments on this document through September 10, 1993. This memorandum reviews this document from the perspective of implications for the City of Coon Rapids and suggests comments that the City Council may wish to provide on the document.

BACKGROUND

Congress designated the MNRRA in 1988 to assure federal, state, and local coordination to manage the historical, recreational, scenic, cultural, natural, economic, and scientific resources of the 72 mile long river corridor through the Twin Cities area.

The Mississippi River Coordinating Commission was established by Congress to assist in preparing a management plan for the MNRRA. The draft Comprehensive Management Plan and Environmental Impact Statement for the river corridor developed by the Coordinating Commission, in cooperation with the National Park Service (NPS), recommends a preferred management proposal for the corridor and identifies three alternatives to this proposal for the management and use of the river corridor. The proposed plan generally advocates balancing river corridor use and natural resource preservation needs. Suggested alternatives to this proposed plan include (1) no action to change river corridor management systems currently in place in response to previous state mandates for the Mississippi River Critical area; (2) emphasis on resource preservation; and (3) emphasis on encouraging visitor use and development. Since Coon Rapids has a fully developed riverfront occupied by residential, educational, and regional recreational uses, the proposed plan or the no action alternative appear to have the most relevance to the City's developed character. Because of this, my review of the management plan document will focus on the specific implications of the proposed plan and the no action alternative for the Mississippi River corridor in Coon Rapids.

DISCUSSION

The table on the following page compares how the proposed MNRRA management plan and the no action alternative to this plan would generally address river corridor issues.

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Mayor, City Councilmembers, City Manager
MNRRA Plan
September 7, 1993
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Issue	Proposed Preferred MNRRA Plan	No Action Alternative
General Concept	Balance use and preservation needs	No action
Land Use/Landscape Character Concept	Preserve and restore natural appearance of shorelines and bluffs; protect historic areas; preserve economic resources; provide setbacks and screen new uses with vegetation	Continue existing land use trends and landscape character mixture
Riverfront Area Land Use	Emphasize river-related and river-enhancing uses; no change to existing development	No new policy on river-related uses near river
Open Space	Provide a continuous linear open space corridor where feasible; acquire threatened sensitive areas	Add some additional park land per existing local plans
Park Land Ownership	Minimal NPS land; additional local park land	No additional NPS land; additional local parks per existing plans
Resource Management	Balanced resource protection and use; increase pollution reduction efforts; protect cultural and economic resources; coordinated research	No additional action; monitor corridor activities
Visitor Use	Provide broad range of activities in appropriate areas	Continue existing types of use with no coordinated management
NPS Development/Cooperative Interpretive Facilities	NPS interpretive/administrative facility in St. Paul and cooperative interpretive center in Minneapolis; cooperative contact stations at north (including Coon rapids Dam) and south ends of river corridor	No NPS facilities
Management Concept	Extensive partnerships	Existing programs; may lead to MNRRA deauthorization
Land Use Management/ Monitoring Option	After State enabling legislation, NPS develops agreements with Metro Council to review local plans and with DNR to review local actions for conformance to MNRRA plan	No additional monitoring

Frankly, since Coon Rapids has a fully developed Mississippi River shore and bluffs, and since the City has been responsibly following plans and regulations adopted in 1980 for the Mississippi River Critical Area for the prevention and mitigation of irreversible damage to the Mississippi River corridor and enhancement of the corridor's natural, aesthetic, cultural and historic values, the proposed MNRRA plan would appear to offer no significant benefits to the City. This conclusion suggests that the MNRRA no action alternative would be most consistent with the City's interests.

Staff offers the following comments and concerns regarding the perceived implications for Coon Rapids of the MNRRA preferred proposal for the management and use of the river corridor.

Mayor, City Councilmembers, City Manager
MNRRA Plan
September 7, 1993
Page 3

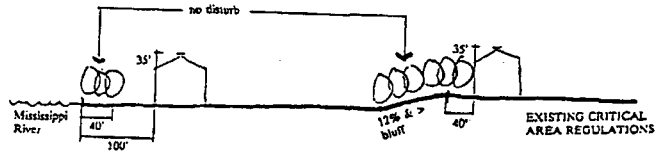
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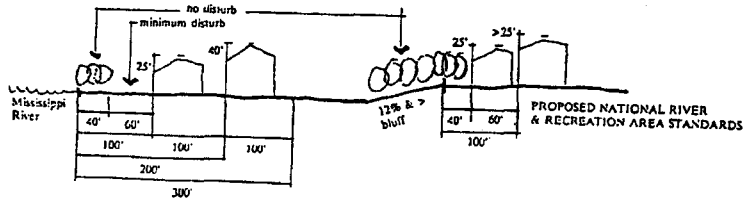
1. Proposed land use policies indicate acceptable riverfront uses would include recreational activities and facilities that are based on water and related land use that capitalize on an attractive river setting; housing that preserves the natural shoreline appearance and provides for river access to residents and the public; open space for passive recreation or for the preservation of natural resources; public facilities, treatment plants, or utilities that require or would benefit from the river location; and educational facilities related to the river. Policies also indicate residential and open space uses should be emphasized north of the I-694 bridge in Fridley and that nothing in the plan would prevent owners of land uses inconsistent with the identified acceptable riverfront uses from selling or leasing their property for the same or similar land uses.

These proposed land use policies suggest uses consistent with existing uses in the Coon Rapids river corridor and would appear to support possible hydroelectric power generation at the Coon Rapids Dam.

2. Proposed site development policies include standards for building setback and height and shoreland and bluff vegetation preservation areas. The following graphic and table compare the proposed MNRRA plan development standards with existing City regulations for the Mississippi River Critical Area.

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Standard	MNRRA Plan-Proposed	Critical Area-Existing
Preserve natural vegetation	40' from shoreline or bluff(also restore natural vegetation if practical) No disturbance of bluff faces over 12%	40' from shoreline or bluff No disturbance of bluff faces over 20% Conditional disturbance of bluff faces over 12% and less than 20%
Minimal disturbance of natural vegetation (selective grading or tree removal)	Within area between 40' and 60' from shoreline	Not addressed
Building setbacks and heights from shoreline	100' for buildings up to 25' high 200' for buildings 25' to 40' high	100' for buildings up to 35' high; maximum 35' height for buildings more than 100' from shoreline
Building setbacks and heights from bluff line	40' for buildings up to 25' high 100' for buildings over 25' high	40' for buildings up to 35' high

5

6 Some existing homes built in river shoreline or bluff areas are nonconforming in terms of existing Critical Area setback and height regulations. These homes would have a greater degree of nonconformity if the proposed MNRRA plan development standards were in effect. The MNRRA plan addresses this nonconformity issue with the following statement. "Structures that do not meet setback and height standards in this plan could be rebuilt on the same footprint if destroyed by fire or natural disaster unless prohibited by federal, state, or local policies."

7 Although the MNRRA plan seems to intend to allow existing buildings with setback or height nonconformities to be rebuilt on the same footprint, this intent is qualified by language in the plan regarding possible federal or state policy prohibitions to such rebuilding. Past Coon Rapids concerns on the issue of rebuilding structures that would not conform to proposed MNRRA plan standards could be better addressed by unqualified statements or specific and unqualified plan policies on this issue.

8 3. Based on the following statements, the MNRRA plan position on open space and trails appears to be responsive to previous Coon Rapids concerns regarding the concept of a continuous trail system along the river. The plan states the following regarding this issue. "With the exception of the northern stretch of the river, it should be possible to provide a continuous trail along or near the river, building on the existing system. Some undeveloped areas would be acquired on the upper river (above the I-694 bridge) for open space purposes, although it is not feasible during the life of this plan to acquire a continuous open space along the upper river due to extensive residential development. However, a continuous trail system using available corridors such as nearby streets and utility easements is an important component of this plan."

9 4. The MNRRA plan proposes an information center at the Coon Rapids Dam providing orientation to the MNRRA and river related environmental and heritage education with Anoka County Parks staff taking the lead for this facility and NPS providing some staffing and exhibit design assistance. This should enhance visitor use at the Dam.

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5. The subject height policy has been changed from 25 feet to 30 feet to address this and other expressed concerns. However, this is not a rigid standard and may be tailored to the character of a community's reach of the river as long as it complies with existing state standards.

6. Specific dimensions are illustrative and can be tailored for local conditions. Revisions of local plans to conform to the MNRRA plan would not be mandated. The MNRRA plan now emphasizes incentives, which should reduce concerns about nonconformities with the MNRRA plan.

7. The language was revised to remove the uncertainty.

8. The comment is noted.

9. The comment is noted.

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While the federal legislation establishing the MNRRA and the MNRRA plan objectives clearly state the importance of managing the nationally significant historical, recreational, scenic, cultural, and scientific resources of the Mississippi River corridor, the MNRRA plan is strangely silent concerning the condition of the Coon Rapids Dam; the implications of potentially losing the Dam; and any possible state or federal initiatives or assistance that could be provided to preserve or enhance the Dam. In Staff's view this is a critical issue that should have been addressed by the MNRRA plan in a creative and meaningful way.

10 5. The MNRRA plan proposes involving the Metropolitan Council and the DNR as partners for implementing the plan. State legislation would be requested to require all local plans and actions to be consistent with the MNRRA Plan. The Metropolitan Council would assist local governments with required comprehensive plan modifications and review the modified plans for consistency with the MNRRA plan. Metropolitan Council efforts would be conducted under a contract with the NPS and the NPS would provide funding for the Metropolitan Council to accomplish its responsibilities. State legislation and rule making would be requested to require local governments to adopt and enforce ordinances consistent with local comprehensive plans which are consistent with the MNRRA plan and DNR rules. The DNR would develop a model ordinance for local adoption and oversee local government adoption and enforcement of the ordinance. DNR efforts would be conducted under a contract with the NPS and NPS would provide funding for the DNR to accomplish its responsibilities. Although the MNRRA plan advocates comprehensive planning and regulatory mandates for local governments to implement the MNRRA plan and extensive

11 interactive involvement with the Metropolitan Council and the DNR, the plan does not recommend any funding assistance for these local governmental activities.

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RECOMMENDATION

Given the level of full development of the Mississippi River corridor in Coon Rapids; existing Critical Area regulations currently being effectively applied to this corridor by the City; and the review of the implications of the proposed MNRRA plan for the City, Staff concludes the proposed MNRRA plan provides no direct and measurable benefits to the City. Staff also finds that the MNRRA plan fails to even acknowledge the most significant river related issue facing the City-the condition of the Coon Rapids Dam. Staff further finds that the efforts that would be needed to modify the City's comprehensive plan and regulations to achieve consistency with the proposed MNRRA plan constitute an unnecessary mandate with costs that would not be compensated by state or federal sources.

Based on these conclusions Staff recommends that the City Council adopt Resolution No. 93-85 expressing the City's support of the no action alternative defined by the MNRRA plan and expressing the City's concerns about the preferred river corridor management proposal advanced by the MNRRA plan.

Respectfully submitted,

Lee Starr
Community Development Director

10. The proposal for state legislation was dropped from the proposed action.

11. The plan was clarified to explain that funds would be requested to support this activity, and it would be a high priority for implementation.

RESOLUTION NO. 93-85

RESOLUTION COMMENTING ON COMPREHENSIVE MANAGEMENT PLAN FOR MISSISSIPPI RIVER NATIONAL RIVER AND RECREATION AREA

WHEREAS, the Mississippi River Coordinating Commission and the National Park Service have prepared a draft Comprehensive Management Plan for the Mississippi National River and Recreation Area (the "MNRRA Plan"); and

WHEREAS, the City Council has reviewed the MNRRA Plan and wishes to offer comments on it.

NOW, THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF COON RAPIDS, MINNESOTA:

1. Given the fully developed Mississippi River corridor in the City; the effective application of Mississippi River Critical Area regulations in this corridor by the City; and evaluation of the implications of the MNRRA Plan preferred alternative for the City; the City Council concludes that the MNRRA Plan provides no direct and measurable benefits to the City. Therefore, the City of Coon Rapids supports Alternative A-No Action under the MNRRA Plan.

2. The City Council has the following comments and concerns about the preferred, balance use and preservation needs, alternative in the MNRRA Plan:

A. The proposal fails to provide explicit and unqualified policy support to allow existing buildings with setback or height nonconformities, relative to proposed development standards, to be rebuilt on the same footprint.

B. The proposal should address the significant issue of the condition of the Coon Rapids Dam and possible state or federal initiatives or assistance to preserve or enhance the Dam.

C. Preparation and adoption of local Comprehensive Plan amendments and regulations consistent with the proposal constitute an unnecessary mandate with local government costs that would not be compensated by state or federal sources.

D. The City appreciates the acknowledgement by the proposal that it is not feasible to acquire a continuous open space corridor along the upper river due to extensive residential development. This is responsive to previous Coon Rapids concerns.

ADOPTED BY THE COON RAPIDS CITY COUNCIL THIS 7TH DAY OF SEPTEMBER,1993

William F. Thompson, Mayor

Attest:

_____

Betty Backes, City Clerk

METROPOLITAN COUNCIL
Mears Park Centre, 230 East Fifth Street, St. Paul, MN 55101-1634 612 291-6359 FAX 612 291-6550 TTY 612 291-090

October 11, 1993

Ms. Joanne Kyral, Superintendent
Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418, Box 41
St. Paul, MN 55101

RE: Draft Comprehensive Management Plan and Environmental Impact Statement
Mississippi National River and Recreation Area
Metropolitan Council Referral File No. 15879-1

Dear Ms. Kyral:

At its meeting on September 23, 1993, the Metropolitan Council considered the Draft Comprehensive Management Plan and Environmental Statement. This consideration was based on a report of the Committee of the Whole. A copy of this report is attached.

The Council approved the following recommendations contained in the above report:

1. That the Metropolitan Council adopt the findings and the staff report as part of these recommendations.

2. That the Metropolitan Council recommend that the preferred alternative in the MNRRA plan and EAW be adopted by the National Park Service as the policy direction for planning for the Mississippi National River and Recreation Area.

3. That the Metropolitan Council recommend that within the context of the preferred alternative, the National Park Service:

1 a. Address the expansion of existing businesses within the corridor in more detail.

2 b. Address transportation issues relative to the relationship between the functions of the designated river corridor and the region's transportation system as defined in the Metropolitan Council's Transportation Guide/Policy Plan and the Aviation Development Guide Chapter.

3 c. Address issues affecting the functioning of the Metropolitan Airport System as defined in the Aviation Development Guide Chapter.

Recycled Paper

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1. The final document now more clearly defines the application of the plan to expansion proposals. In general, expansion is acceptable as long as it does not create or increase a nonconformity with the MNRRA plan. Additional development should attempt to meet the goals of the plan. In cases where the use is nonconforming, expansion should attempt to substantially conform. In all cases the expansion should meet visual screening and shoreline setback guidelines contained in approved critical area plans. The expansion policy can also be tailored by communities to meet local needs.

2. See response to comment G-15-2. Stronger references to regional plans are made in the final MNRRA plan.

3. See response to comment G-15-2.

4 d. Address the future status of Upper and Lower Grey Cloud Islands.

5 e. Address the unique nature and potential problems of the Mississippi River Dam at Coon Rapids in more detail.

6 f. Extend the comment period 30 days to allow other agencies the opportunity to comment on Metropolitan Council and Department of Natural Resources' comments.

7 g. Designate a lead agency to streamline the regulation process within the river corridor.

8 h. Designate the Metropolitan Council as a lead partner in addressing the water quality problems in the Mississippi River.

The Metropolitan Council has worked very hard with the National Parks Service and the Minnesota Dept. of Natural Resources to develop an implementation program. Each of the agencies is building on its strengths. The Council as the overall regional planning agency for the Metropolitan Area is uniquely suited to review local plans to assure compliance with the Mississippi National River and Recreation Area plan. Furthermore, using the existing plan review structure would avoid the need to develop a new structure or bureaucracy. The Council strongly supports the joint implementation program put forth in the preferred alternative and any efforts to streamline the permit and plan review process within the corridor.

Sincerely,

Dottie Rietow
Chair

DR:lv
Attachment

cc: Richard Thompson, Metropolitan Council Staff

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4. The plan is not site specific. See response to comment G-22-1.

5. See response to comment G-22-1.

6. This was done.

7. The Department of Natural Resources was designated as the lead agency for streamlining in the final plan.

8. The plan was clarified to explain that existing roles in water quality would not change under the plan, including the Metropolitan Council's role in water quality planning for the Twin Cities area. The Metropolitan Council does not possess regulatory authority, so a partnership approach is needed. A comprehensive water quality policy should be completed by the Metropolitan Council in cooperation with the Minnesota Pollution Control Agency, Department of Natural Resources, National Park Service, and other interested parties. The Partner Roles section was amended to reflect these cooperative efforts.

CITY OF SAINT PAUL
James Scheibel, Mayor

Division of Planning
25 West Fourth Street
Saint Paul, MN 55102

Telephone: 612-228-3200
Facsimile: 612-228-3220

DATE: Sept. 10, 1993

TO: JoAnn Kyral, Superintendent
Mississippi National River and Recreation Area

FROM: Julie Farnham, Planner J.F.
City of Saint Paul, PED

RE: City of Saint Paul's response to MNRRA Draft Comprehensive Plan/EIS

Enclosed please find a letter from Mayor Scheibel, a City Council resolution, and a list of specific comments on the draft plan. These documents comprise the City of Saint Paul's response to the draft MNRRA Comprehensive Plan/EIS. At their meeting last evening, the City Council unanimously passed a resolution supporting the proposed plan with the suggested refinements included in the list of specific comments. Because this was just acted on yesterday, the enclosed resolution does not include signatures. I will send you the final, signed copy when it is available.

If you have any questions about our comments, please do not hesitate to give me a call at 228-3325 (through Sept. 17), or 266-6562 (after Sept. 17). I want to thank you again for the opportunity to comment on this important plan and hope our comments are useful. I look forward to working with you in the future to implement the plan.

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CITY OF SAINT PAUL
James Scheibel, Mayor

390 City Hall
15 West Kellogg Boulevard
Saint Paul, MN 55102

Telephone: 612-266-8510
Facsimile: 612-266-8513

September 10, 1993

JoAnn Kyral, Superintendent
Mississippi National River Recreation Area
175 East Fifth St., Suite 418, Box 41
Saint Paul, MN 55101

Dear Ms. Kyral,

Thank you for the opportunity to review and comment on the Draft Comprehensive Management Plan for the Mississippi National River Recreation Area (MNRRA). The MNRRA presents Saint Paul with a unique opportunity to realize and enhance the vision for our riverfront. The plan also provides a framework to work in a cooperative and coordinated manner to enhance one of the most significant resources in Saint Paul and the metropolitan area. We appreciate the efforts of the Mississippi River Coordinating Commission in developing the draft plan and providing opportunities for broad public input throughout the process.

The City of Saint Paul believes the current draft has significantly improved upon the preliminary draft. We support the plan's purpose and vision, and many of the proposed policies and actions. We are particularly excited about the location of the Interpretive Center in Saint Paul and the opportunity to form strong partnerships with the National Park Service and others to ensure protection of natural, recreational, cultural, visual, and economic resources throughout the corridor.

Our concerns and comments are focused on two major issue areas: 1) preserving a balance between protection of natural resources and economic development within the context of the "working river"; and 2).retaining local control over land use and development decisions.

Preserving a Balance

The Mississippi River corridor in Saint Paul exhibits remarkable diversity. Much of the shoreline has retained a natural appearance due to considerable amounts of recreational land and open space located adjacent to the river. Our downtown was founded and flourished on the banks of the river which continues to contribute to Saint Paul's cultural, historical, aesthetic, and economic vitality. We recognize the river corridor as an amenity that will help the City in its economic development activity as well as provide the resource base for recreational, scientific, and educational activities. We also recognize the need to preserve sensitive natural

environments. Good environmental quality of the river and environs is one of Saint Paul's most valuable resources.

1 However, we are concerned that some of the proposed locational policies and site development policies could discourage economic development. The City of Saint Paul supports and encourages high quality, sustainable development. We believe greater emphasis should be placed on embracing environmentally compatible, non-polluting development which utilizes sensitive landscaping and design.

Retain Local Control Over Land Use Decisions

2 We recognize that establishing regulatory continuity is one of the primary goals of the plan. While some continuity is necessary, we are concerned that the many layers of review proposed in the plan would remove land use decisions from local control. In addition, the language describing the review process for land use and development decisions is vague and lacks adequate specificity regarding review powers and time limits. Our concern is that without more clarity, the review process could be subject to a wide range of interpretation.

The plan needs to clarify:

- What types of proposals constitute "major land use decisions" that merit review by the NPS and MNRRA Commission.
- What "review" means - does it call for an approval process that doesn't currently exist?
- A definite structure for the review process, including time frames.
- What DNR "certification authority over local decisions" means.

I hope that our comments, questions, and suggestions will be useful in preparing the final plan. We believe that addressing these concerns will result in a stronger plan which will recognize and enhance the diversity which characterizes the MNRRA corridor. If you have any questions regarding our comments please do not hesitate to contact Julie Farnham of the Department of Planning and Economic Development (PED) at 228-3325.

Again, thank you for the opportunity to comment on the draft plan. I look forward to working with you to enhance the river corridor in Saint Paul and throughout the MNRRA.

Sincerely,

James Scheibel
Mayor

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1. The policies were revised to reflect these concerns.

2. The MNRRA act does not mandate consistency of local plans, but rather lays out a process for evaluating corridor plans and addressing inconsistent activities. The revised MNRRA plan emphasizes an incentives approach rather than an enforcement approach to plan consistency. Major land use decisions were defined in the glossary. However, additional clarifying language was added to the text in the final plan. The review process for local plans, ordinances, and actions is also described in the final plan. The goal is to use existing review processes in a coordinated way, with the agencies reviewing projects concurrently. Under the revised plan, the Department of Natural Resources would not have certification authority over local decisions, except to certify to the National Park Service that revised ordinances and implementation programs are consistent with the MNRRA plan.

DEPARTMENT OF PLANNING
& ECONOMIC DEVELOPMENT
Kenneth B. Peterson, Director

CITY OF SAINT PAUL
James Scheibel, Mayor

25 West Fourth Street
Saint Paul, MN 55102

Telephone: 612-266-6700
Facsimile: 612-228-3261

September 23, 1993

JoAnn Kyral, Superintendent
Mississippi National River and Recreation Area
175 East Fifth St., Suite 418, Box 41
St. Paul, MN 55101

Dear Ms. Kyral,

Enclosed please find the signed City Council resolution concerning the City of St. Paul's response to the MNRRA draft plan/EIS.

If you have an questions regarding our response, do not hesitate to call me at 266-6562.

Sincerely,

Julie Farnham

Julie Farnham
Planner

"SUBSTITUTE RESOLUTION"
Amended by Intergovernmental Relations Committee Council File # 93-1353

Green Sheet # 24088

RESOLUTION
CITY OF SAINT PAUL, MINNESOTA

Presented By

Referred To Committee: Date

WHEREAS, on November 18, 1988 Public Law 100-696 established the Mississippi National River and Recreation Area (MNRRA) as a unit of the national park system, to include 72 miles of the Mississippi River, four miles of the Minnesota River and encompasses 54,000 acres of public and private land and water in five Minnesota counties, stretching from Dayton to south of Hastings, and which is to be administered by the national Park Service (NPS), an agency of the U.S. Department of the Interior; and,

WHEREAS, Saint Paul's 29 miles of Mississippi River shoreline represents the longest stretch of riverfront of any municipality in the MNRRA, and contain nationally significant natural, cultural, recreational, scenic, economic, and scientific resources;, and,

WHEREAS, Saint Paul's riverfront has a rich heritage as a working river and supports a diversity of economic, residential and recreational activities which make important contributions to Saint Paul's quality of life; and,

WHEREAS, the City of Saint Paul places a high priority on the preservation of existing parkland and sensitive natural resources, a considerable amount of which are located within the riverfront area and provide natural habitat, relief from the built urban environment, and contribute to Saint Paul's quality of life; and,

WHEREAS, Saint Paul completed several plans for the river corridor area and invested over $100 million in riverfront improvements over the past ten years, including roads, parks, redevelopment area site assembly, removal of blighting influences, soil and water correction, and flood protection to provide a high quality physical environment along the riverfront which will be an attractive site for compatible development, recreation, entertainment, interpretive programs, and scientific research; and,

WHEREAS, it is important to preserve local control over land use planning and zoning, limit the levels of government, and foster cooperative and coordinated partnerships to enhance the river corridor; and,

WHEREAS, the MNRRA presents a compelling opportunity to complement Saint Paul's commitment to redevelopment of the riverfront area, and protect and preserve the economic cultural, recreational, and natural resources throughout the river corridor, and greatly enhance interpretive efforts; and,

NOW THEREFORE BE IT RESOLVED, by the Saint Paul City Council that the Mississippi River Coordinating Commission place special emphasis in its Comprehensive Management Plan/Environmental Impact Statement for the MNRRA on "working river" as a

Page 1 of 2 Pages

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means of encouraging high quality development, with emphasis placed on embracing environmentally compatible, non-polluting businesses which utilize sensitive landscaping and design, provide physical and visual access to the river, and provide river related amenities; and,

BE IT FURTHER RESOLVED, THAT: control over land use decisions within the MNRRA be applied through an established and agreed upon structure and process, and that the integrity of local zoning authority be preserved in the MNRRA; and,

BE IT FURTHER RESOLVED, THAT: the City of Saint Paul supports the efforts of the Minnesota Department of Natural Resources (DNR) and National Park Service (NPS) to preserve and enhance ~~existing~~ parkland and natural resources within the MNRRA, and welcomes NPS assistance in developing a national tourism program, including establishing a MNRRA interpretive center on the riverfront; and,

BE IT FURTHER RESOLVED, THAT: the City of Saint Paul supports strong working partnerships between local, state, and federal agencies, in regard to management of the natural, cultural, recreational, and economic resources in the MNRRA; and,

BE IT FURTHER RESOLVED, THAT: the current draft plan/EIS has significantly improved upon the preliminary proposal and the City of Saint Paul supports the current plan proposal, with refinements such as those noted in the MNRRA Plan Specific Review Comments, over alternatives A, B, and C.

Page 2 of 2 Pages

Requested by Department of:

Planning and Economic Development

By:_____

Parks and Recreation

By:_____

Public Works

By:_____

Form Approved by City Attorney

By:_____

Approved by Mayor for Submission to Council

By:_____

Adopted by Council: Date SEP 9 1993

Adoption Certified by Council Secretary

By:_____

Approved by Mayor: Date SEP 14 1993

By:_____

means of encouraging high quality development, with emphasis placed on embracing environmentally compatible, non-polluting businesses which utilize sensitive landscaping and design, provide physical and visual access to the river, and provide river related amenities; and,

BE IT FURTHER RESOLVED, THAT: control over land use decisions within the MNRRA be applied through an established and agreed upon structure and process, and that the integrity of local zoning authority be preserved in the MNRRA; and,

BE IT FURTHER RESOLVED, THAT: the City of Saint Paul supports the efforts of the Minnesota Department of Natural Resources (DNR) and National Park Service (NPS) to preserve and enhance parkland and natural resources within the MNRRA, and welcomes NPS assistance in developing a national tourism program, including establishing a MNRRA interpretive center on the riverfront; and,

BE IT FURTHER RESOLVED, THAT: the City of Saint Paul supports strong working partnerships between local, state, and federal agencies, in regard to management of the natural, cultural, recreational, and economic resources in the MNRRA; and,

BE IT FURTHER RESOLVED, THAT: the current draft plan/EIS has significantly improved upon the preliminary proposal and the City of Saint Paul supports the current plan proposal, with refinements such as those noted in the MNRRA Plan Specific Review Comments, over alternatives A, B, and C.

Page 2 of 3 Pages

Requested by Department of:

Planning and Economic Development

By:_____

Parks and Recreation

By:_____

Public Works

By:_____

Form Approved by City Attorney

By:_____

Approved by Mayor for Submission to Council
By:_____

Adopted by Council: Date_____

Adoption Certified by Council Secretary

By:_____

Approved by Mayor: Date _____

By:_____

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Mississippi National River and Recreation Area (MNRRA) Plan
Specific Review Comments

The City of Saint Paul believes the current draft plan proposal has significantly improved upon the preliminary proposal. The proposed plan presents a more balanced approach to natural resource protection and economic development on the river, and we support it over all of the alternatives. We also recognize the MNRRA as an opportunity to form strong working partnerships with the National Park Service (NPS) and others to ensure protection of natural, recreational, cultural, visual, and economic resources throughout the entire corridor.

The City of Saint Paul welcomes the support and assistance of the NPS in our efforts to protect existing parkland resources. We are particularly excited about the location of the Interpretive Center and MNRRA administrative headquarters on Harriet Island. We strongly support NPS assistance with interpretive services and would appreciate additional language on pp. 76-77 regarding the NPS role in developing a "national tourism program". We are also very interested in what assistance might be available to local communities to fund riverfront improvements such as trails, overlooks, lighting, park maintenance, and interpretive programs and suggest adding more specific language in this regard to the Funding section on p. 87.

While we support many of proposed policies and actions in the draft plan, we still have some concerns, particularly in regard to preserving a balance within the context of the "working river"; and retaining local control over land use and development decisions.

Following is a listing of detailed comments and suggested refinements regarding specific sections of the plan.

PROPOSED PLAN - GENERAL CONCEPT

100

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1. p. 17, 1st pgh. under Concept: "Additional open space and trails would be acquired and developed by local governments where consistent with local comprehensive plans which have been adopted or amended pursuant to the MNRRA Plan. The City supports the goal of developing continuous trails throughout the corridor, however, recognizes that riverfront trails may not be feasible in all locations. St. Paul has demonstrated its *commitment to this goal in developing an extensive system of trails, existing and* proposed, within our parks along the river.

LAND AND WATER USE

The key issues for St. Paul in this regard are that the river be preserved as a "working river" and that there is a balance between resource preservation and economic development. A primary concern is that proposed development standards are not appropriate to all segments of the corridor and could discourage even compatible development. The Plan recognizes the diversity of uses and character within the corridor and states that denser waterfront development is appropriate in downtown areas. This concept should be consistently reflected in the specific proposed policies and actions.

3. This was inserted.

4 In addition, development controls such as landscaping and design guidelines may do more to ensure compatible and attractive development than limiting the types of uses allowed in the riverfront area.

Planning Assumptions

2. p. 18, bullet 2: Plan recognizes need to "rank protection needs based on area characteristics". The Plan also states (p. 19, second to last pgh.): "Except in existing commercial and industrial developments, downtown areas, and historic districts, the riverfront and bluff area would appear mostly natural from the river and its shoreline areas." **The Plan needs to clarify how this concept, or tailoring regulations to specific areas, will be carried through in the model ordinance.**

5

Land Use and Protection Policies pp. 20-24:

3. p. 20, pgh. 1: Add "Except in existing commercial and industrial developments, downtown areas, and historic districts, currently undeveloped land areas in the corridor would continue to appear open from the river..." . This addition reflects the statement on p. 19, 3rd full paragraph regarding the appearance of the riverfront and bluff areas. It also suggests that existing River Corridor zoning regulations should apply in downtown areas.

6

4. p. 23, (1): The Plan states: "The most significant scenic, cultural, or natural resources, including scenic and trail easements, would be acquired by local governments." **Clarify the availability of funding to local govt. for acquisition.**

7

5. The Plan states that DNR and the Met. Council will receive supplemental funding to accomplish their responsibilities to review plans and ordinances. **Local governments should also receive supplemental funding to accomplish any new responsibilities required to implement the plan.**

8

6. p. 24, pgh. 1: Clarify - "As long as the plan's visions are achieved and resources identified in the act are protected, communities could tailor policies to the specific resources in their section of the river". **Plan should ensure local governments have an active role in *the creation, review, and adoption of the model ordinance to ensure that specific development regulations reflect their unique circumstances.***

9

Location Policies pp. 24-26

7. p. 24 (1): Add - "Uses are encouraged that demonstrate that they would enhance the riverfront...restoration of a natural shoreline appearance, clean up polluted soils, remove blighting influences, sustain economic viability of riverfront improvement, and providing physical and visual access...."

10

8. p. 24, (1): Plan states: "Areas behind existing levees would be an exception to this 300-foot riverfront use policy because they are normally physically and aesthetically cut off from the river and usually already heavily committed to industrial uses." **Proposed site**

11

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101

4. The riverfront policy was substantially revised and simplified to respond to these comments. See responses to comments G-8-7 and G-10-1.

5. Text was added to clarify this. Follow-up efforts with the Metropolitan Council would further clarify this.

6. This was added.

7. The National Park Service would encourage local governments to implement the plan through the grant program and other means. There is a list of criteria for land acquisition in the plan that would guide this process.

8. The final plan was clarified to explain that funds would be requested to update local plans, which would be a high priority for implementation.

9. The Department of Natural Resources would prepare the draft model ordinance with input from the Metropolitan Council and National Park Service. Local governments would also have an active role in its preparation, and they would have the lead in preparation of their own plans and ordinances. The model ordinance would be provided as a sample of how an ordinance may be revised for substantial conformance with the MNRRA plan but would not be mandatory.

10. These ideas were incorporated into the desired qualities of development in the riverfront area with greater emphasis on how uses are developed, not on what they are. See responses to comments G-8-7 and G-10-1.

11. See response to comment G-8-2.

COMMENTS

development policies concerning building setbacks and height should not apply to areas behind existing levees for the same reasons. The existing River Corridor zoning requirement for a 50' setback from the shoreline and site plan review would continue to be applied.

12 9. p. 24, (1): *Clarify* - How location policies in the riverfront area apply to expansion of existing development that does not need a river location. Expansion of existing uses/structures that would be considered "non-conforming" under proposed new regulations should be allowed provided the expansion does not increase the non-conformity (i.e. could maintain the same use, setback, and height as exists).

13 10. p. 24, bullet 4: Add - "office buildings and non-polluting light industrial facilities that blend with surrounding..."

14 11. p. 25, 1st pgh.: Change - "Existing uses that ~~do not relate to the river~~, cause environmental degradation of the river, do not need to be located near the river,..."

15 12. p. 25,(discouraged uses) bullet 1: Change - "~~general~~ heavy industry and warehousing..."

16 13. p. 25, (discouraged uses) bullet 2: Add - "general commercial and services that are incompatible with acceptable riverfront uses."

14. p. 25, last pgh.: Add - "(2) enhance resources..., clean up polluted soils or remove blighting influences, and"; "(3) generally improve land use in the riverfront area...visual access from adjacent areas, and/or a continuous public trail along the river..."

17 15. p. 26 (2): Add - "Develop incentives to encourage noxious industries that no longer rely on the river for transportation or other needs to relocate out of the riverfront area." ~~Industries that do not technically require a river location, but also do not harm the river or pollute the environment should not be considered incompatible, and therefore not be coerced into relocating. However, federal incentives (funding) should be available to enable communities to respond to opportunities to realize the vision and goals of adopted plans which will enhance the riverfront.~~

Site Development Policies pp. 26 -29

18 16. p. 26, (1): Qualify - "preserve a natural look from the river and opposite shore..." recognize that it is appropriate for development to be visible along the riverfront in downtown areas as mentioned in EIS (p. 151 "Significant visual features include...St. Paul skyline...")

19 17. p. 27: Proposed setbacks and height limits are too restrictive in urban downtown areas. The proposed 100' setback is double the current river corridor/critical area setback of 50 ft. The proposed height limit of 25' is also lower than the 30' allowed for residential and commercial buildings in much of the river corridor zoning district. The existing river corridor zoning regulations, in addition to site plan review requirements for landscaping and design considerations, provide adequate assurance of compatible development in the riverfront area. We suggest retaining existing river corridor zoning regulations from

RESPONSES

12. This idea was added to the expansion policy.

13. See responses to comments G-8-7 and G-10-1.

14. See responses to comments G-25-11 and 13.

15. See responses to comments G-25-11 and 13.

16. See responses to comments G-8-7 and G-10-1.

17. This policy was revised, and the term "polluting" was used instead of noxious.

18. The exception language for downtowns was inadvertently deleted from one place in the text. The major downtowns would be excepted, and these areas would be specified in local plans. This is clarified in the final MNRRA plan. The intent is for downtown areas to be treated differently, and it is recognized that they would be visible from the river and opposite shore.

19. The policy excepts downtown areas, the 25-foot dimension was changed to 30 feet, and the text further emphasizes that this is a recommendation that can be adjusted up or down according to local character.

downtown to Red Rock/North Star Steel.

20 18. p. 29, (14): Add- "Apply setback and height restrictions to maintain the ability to view the river from existing open space and developed uses by not significantly obstructing views with proposed development."

19. p. 29: Plan states variance procedure would be in accord with state statutes and also that variances would be handled through the established local variance procedure. **St. Paul's variance procedure is in accord with state statutes and will continue to be in accord with state statues.**

PLAN IMPLEMENTATION

The key issue for St. Paul in this regard is retaining local control over land use and development decisions within the MNRRA corridor. We recognize that establishing regulatory continuity is one of the aims of the Plan and support inclusion of the NPS and DNR at the table to comment on development proposals within the context of our established development review process. Our primary concerns are lengthening the review process and removing land use decisions from local control.

Partner Roles pp.76-79

21 20. pp. 76-78: **Clarify "review" and define time limit for review** - The Plan proposes NPS and MNRRA Commission "review of major land use decisions" and DNR "review of development proposals". In effect the Plan proposes to include three additional, non-local, agencies in the review process. Our concern is that their review capacity is not clearly defined with regard to what types of decisions or proposals they would review and what affect their involvement would have on the length of the review process.

"Review" should be limited to advisory review comments but clearly stop short of approval authority. The review period should not lengthen the existing review process. Time limits for review should be defined. We suggest maintaining the current review period which is 10 - 30 days prior to a public hearing. We also suggest including an example of the review process and time frame in the Plan.

22 21. p.77: The Plan states that the Met. Council would "seek comments from the commission and the Park Services, and the DNR" in reviewing draft plan amendments. **Define time frame for Metropolitan Council review of local comprehensive plan amendments.**

23 22. p. 77: **Clarify DNR "certification authority over local decisions". Once a community's ordinance is "certified" it seems extraneous for DNR to review all development proposals.** The local government is capable of applying the comprehensive plan and zoning regulations to development proposals. DNR review of proposals meeting all zoning requirements would add an unnecessary additional layer of review.

The existing process requires DNR be notified of all SCUP or variance requests in the River Corridor District at least 10 days prior to the public hearing. DNR also has review and approval authority over any amendments to the River Corridor District

9/9/93

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20. This was added.

21. The term was clarified; time frames would be concurrent to the maximum extent practical.

22. This is beyond the scope of the plan, but would be developed in follow-up work.

23. Existing state authorities would not be changed. The critical area program would be transferred to the Department of Natural Resources. The plan text was revised to remove the implication that Department of Natural Resources would have a veto authority. The review process was clarified in the final plan, but details would be worked out in follow-up agreements. However, the MNRRA legislation directs that a broad array of development actions be reviewed, so the extent of review would probably be somewhat greater than envisioned by the commenter.

(rezonings, text amendments). **We suggest retaining the existing process with regard to the DNR role once our ordinance has been "certified".**

23. pp. 77-78, 83: Clarify - the Plan says that after consistent local ordinances are adopted, the Critical Area ordinance for that community would be nullified. On page 83 the plan says that "after the comprehensive management plan is completed, local governments would be asked to review and update their critical area plans and ordinances." These statements are contradictory. **The City does not support nullifying its existing four River Corridor Overlay zoning districts. We prefer to amend the existing River Corridor district regulations to conform with the MNRRA Plan.**

24 **In addition, the transition from the existing critical area ordinances to the new ordinances should be clarified. The Plan should clarify that existing comprehensive plans and ordinances remain in effect until they are updated to conform with the MNRRA Plan. Adoption of the MNRRA Plan should not trigger a moratorium on development in the interim prior to updating existing plans or ordinances.**

RESOURCE MANAGEMENT

The key issue for St. Paul in this regard is maintaining a balance between protection of natural resources and utilization of economic resources. Good environmental quality is one of the City's most valuable resources - from the standpoint of both environmental protection and economic development. We support the Plan's proposed policies to prevent pollution, clean up polluted sites, and protect our natural, recreational, cultural, and economic resources. Our primary concern is duplicating or lengthening existing governmental regulatory processes.

Resource Management - pp.39-48

24. There are many existing permitting and regulatory agencies currently involved in various aspects of environmental review (Appendix J). We support and encourage efforts to streamline the regulatory process. **The Plan should ensure that proposed policies and actions do not duplicate existing governmental review processes. The strategies identified on pp. 82-83 to streamline the regulatory process should be realized before the MNRRA Plan goes into effect.**

25

DEFINITIONS

It is important that all meaningful terms be defined and that definitions are specific enough to provide sufficient clarity.

Glossary of Terms - pp. 237-242

25. p. 239 "Location policies" - misleading term; these really refer to permitted (encouraged) and discouraged land uses within the riverfront area. Suggest renaming riverfront land use policies.

26

26. p. 239 "Major land use" - too general; suggest only uses requiring variances or EIS be considered "major land uses".

27

9/9/93

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24. The plan now explains that local plans and ordinances can be amended to substantially conform to the MNRRA plan and need not be replaced entirely. The plan does not propose a moratorium on development while local plans and ordinances are updated.

25. It would not be consistent with the MNRRA legislation to wait.

26. The plan was clarified to explain which policies would apply to the riverfront and which would apply to the entire corridor (also see responses to comments G-8-7 and G-10-1).

27. The threshold for review of projects not requiring a federal action was clarified in the partner roles section of the final plan. It states that nonfederal actions that require a state environmental worksheet would be reviewed by the National Park Service. Additional projects might be reviewed by the National Park Service if there is a request from another agency or the project applicant.

COMMENTS

28

27. p. 240 "Riverfront area" - Add "a 300-foot wide area adjacent to the shoreline where certain types of land uses are encouraged and subject to site development policies"

29

28. p. 241 "Site development policies": Change - "those policies that affect ~~a development after it has been located in the landscape~~ site specific development within the riverfront area and bluff preservation area. These ~~are normally more detailed than location policies, dealing~~ deal with specific issues such as setbacks and height, and provide a basis for even more specific design guidelines.

30

29. p. 241 "Variance": Suggest including state statute definition rather than simply referencing it.

RESPONSES

28. The site development policies are intended to apply to the entire corridor unless otherwise specified, such as those addressing only the shoreline.

29. The plan was clarified to explain the relationship of location policies to site development policies.

30. It is not necessary to include the state statute definition as that information is readily available to most plan users.

City of Champlin

11955 CHAMPLIN DRIVE CHAMPLIN, MN 55316-2399 (612) 421-8100

September 8, 1993

Attn: Superintendent
Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418
Box 41
Saint Paul, Minnesota 55101

Dear Superintendent:

The City of Champlin has reviewed the draft Mississippi River and Recreation Area Plan to determine what, if any, affect the proposed plan would have on the City. Overall the plan is considered a positive step in preserving the natural integrity of the River bank. The City has long been a proponent of solid natural resources management and river bank preservation. There are, however, a few issues that need to be addressed that concern the City of Champlin.

1) In the Summary section of the report there is a statement that allows for the "retention of flexibility to respond to unusual situations in special ways providing that the resource identified in the MNRRA act are protected". Although flexibility is necessary, what agency will be given the authority to oversee the flexibility issue? If it is the local governments, then who will over see that random variances are not issued creating a plan that cannot be enforced or enforced differently by each local government? Champlin is not proposing that some other agency be created that would oversee all of the improvements along the river, however, a variance process that requires approval of a separate government agency would be appropriate.

1

2) The Plan states that each local government will be required to update their land use plans (Comprehensive Plans) for the corridor to conform to this MNRRA Plan. Although, the City of Champlin is not adverse to such a requirement, the concern is the process that will be followed to require such a plan amendment. Will the local governments be given a deadline of when the plan amendment must be made or will the amendment be required to be made prior to the approval of any other local government requested land use amendment? The reason that this is a concern is due to the need to package plan amendments to better utilize staff time rather than to be required to complete an amendment every time a new policy is adopted by another government agency.

2

The City of Champlin is an Equal Opportunity/Affirmative Action Employer

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1. The plan stresses coordination, incentives, and monitoring. The Department of Natural Resources would monitor community actions in the corridor for consistency with the MNRRA plan and revised critical area plans.

2. No time frames are set in the plan, and no moratoriums are proposed.

3) Page 18 of the draft states that the improvements will be concentrated on the new developments rather than old developments. Although this makes some sense, there is a concern that the new regulations could prevent new and old developments from being compatible. There needs to be some flexibility with design to allow compatibility of new and old developments. The plan does state that "compatible residential uses" is a goal. 3

4) For a plan to be effective and enforced on a consistent basis there needs to be a governing body to oversee how each local government is administering the plan. The Plan states that there will be involvement by the Metropolitan Council, Department of Natural Resources and the Park Service. Because of the number of agencies there is the potential that the local government planning process could become very cumbersome. 4

5) Periodically throughout the draft plan, there is mention that the local governments will acquire "the most significant scenic, cultural, or natural resources, including scenic and trail easements". Although the protection of the resources are important, who will decide which areas are important and how will the acquisitions be funded? 5

6) There is mention that the DNR would put together a draft ordinance for local governments to use as a model when drafting their ordinances. The hope is that the DNR will be allowed to participate in the ordinance preparation process in a similar manner as they have been with the MNRRA Plan. 6

107

Overall the plan is a good start towards protecting the Mississippi River and it's natural resources. However, there needs to be some further thought on how the plan will be consistently administered without increasing the cost to local governments and the property owners along the River.

I hope the above information will assist you in the completion of a draft plan. If you have any questions or need any further information, please contact me at 421-3055.

Sincerely,

Steven P. Juetten
Community Development Director

cc Kurt Ulrich, City Administrator

3. The plan allows for special situations and blending new development with existing development.

4. The MNRRA act requires the National Park Service to contract with state or local agencies for this function. In addition, concern over local control and potential duplication has led the commission to prefer the proposed process, which takes advantage of the existing state authorities and roles and of the Metropolitan Council and the Department of Natural Resources in the area. Whenever practical, the proposed review process would be concurrent with other reviews. The final plan was revised to clarify roles and to stress the need to build on the existing review process and avoid another layer of government.

5. The National Park Service would encourage local governments to implement the plan though the grant program and other means. There is a list of criteria for land acquisition in the plan that would guide this process.

6. The Department of Natural Resources would have the lead and would work with local governments, the Metropolitan Council, and the National Park Service to develop the model ordinance.

Saint Paul Parks and Recreation Commission
300 City Hall Annex, 25 W. 4th Street, Saint Paul, MN 55102 - - 612/292-7400

September 10, 1993

Peter Gove, Chairman
Mississippi River Coordinating Commission
175 East Fifth Street, Suite 418
Saint Paul, Minnesota 55101

Dear Chairman Gove:

The Saint Paul Parks and Recreation Commission has reviewed the Mississippi National River and Recreation Area (MNRRA) Comprehensive Management Plan prepared by the National Park Service (NPS). The Commission voted unanimously to approve the attached resolution at its September 8 meeting.

1 In essence, the Commission places the highest priority on preservation of parkland and natural resources and encourages NPS assistance in developing a national tourism program, including establishing an NPS Headquarters and MNRRA interpretive center on the riverfront at Harriet Island.

We appreciate the opportunity to comment on this important document and look forward to the continued development of the MNRRA Plan.

Sincerely,

Jill S. Danner

Jill Danner, Chair

cc: Michael Madell, MNRRA Acting Superintendent
Senator Sandy Pappas
Mayor James Scheibel
City Councilmembers
Robert Piram
Parks and Recreation Commissioners

Saint Paul Parks and Recreation Commissioners:
Jill Danner, Chairperson; Terrence Huntrods, First Vice-Chairperson; *Mary Forliti, Second Vice-Chairperson*
Richard Arey, Ann Cieslak, David Goodlow, Barbara Johnson, Barbara Rose, Kiki Sonnen

1. These items are a priority for plan implementation.

Saint Paul Parks and Recreation Commission

RESOLUTION

WHEREAS, on November 18, 1988, Public Law 100-696 established the Mississippi National River and Recreation Area (MNRRA) as a unit of the national park system, to include 72 miles of the Mississippi river, four miles of the Minnesota River and encompass 54,000 acres of public and private land and water in five Minnesota counties, stretching from Dayton to south of Hastings, and which is to be administered by the National Park Service (NPS), an agency of the U.S. Department of the Interior; and

WHEREAS, Saint Paul's 29 miles of Mississippi River shoreline represents the longest stretch of riverfront of any municipality in the MNRRA and is endowed with diverse natural resources of national significance, including fossil beds, natural caves, bluffs and shoreline, lakes and wetlands in the Hidden Falls/Crosby Farm, Lilydale/Harriet Island and Battle Creek Regional Parks; and

WHEREAS, the Saint Paul Parks and Recreation Commission places the highest priority on the preservation of the parkland and natural resources located within the riverfront area, which provide natural habitat, contribute to improved water quality, provide relief from the built urban environment, and enhance Saint Paul's quality of life; and

WHEREAS, the Commission believes it is important to foster cooperative and coordinated partnerships to enhance the river corridor; and

WHEREAS, the Commission believes the MNRRA presents an unparalleled opportunity to complement Saint Paul's commitment to the riverfront area, and protect and preserve historical, cultural, recreational, and natural resources throughout the river corridor, and greatly enhance interpretive efforts.

RESOLVED, that the Saint Paul Parks and Recreation Commission recommends that the Saint Paul City Council support the MNRRA Comprehensive Management Plan, and the efforts of the Minnesota Department of Natural Resources (DNR) and the National Park Service (NPS) to preserve and enhance parkland and natural resources within the MNRRA, and encourage NPS assistance in developing a national tourism program, including establishing an NPS Headquarters and MNRRA interpretive center on the riverfront at Harriet Island.

BE IT FURTHER RESOLVED, THAT: the Commission recommends support for strong working partnerships between local, state, and federal agencies, in regard to management of the natural, cultural, recreational, and economic resources in the MNRRA.

Adopted by Saint Paul Parks and Recreation Commission: Date 9-8-93

Approved: Yeas 8

Nays 0

Absent 1

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MINNESOTA HISTORICAL SOCIETY

September 10, 1993

Ms. JoAnn M. Kyral
Mississippi National River and Recreation Area
175 East Fifth Street - Suite 418
St. Paul, Minnesota 55101

Dear Ms. Kyral:

Re: Draft Comprehensive Management Plan
Mississippi National River and Recreation Area
Anoka, Ramsey, Washington, Dakota, and Hennepin Counties
MHS Referral File Number: 93-0350

Thank you for the opportunity to review and comment on the Draft Comprehensive Management Plan for MNRRA. It has been reviewed pursuant to the responsibilities given the State Historic Preservation Officer by the National Historic Preservation Act of 1966 and the Procedures of the Advisory Council on Historic Preservation (36CFR800), and to the responsibilities given the Minnesota Historical Society by the Minnesota Historic Sites Act and the Minnesota Field Archaeology Act.

We have appreciated previous opportunities to review and comment on elements of this plan, and are pleased to see that many of our recommendations have been incorporated into the current draft.

We have the following comments on the report:

1. The section on Cultural Resources Management includes some appropriate policy language regarding preservation and use of historic properties. However, outside of direct acquisition of a handful of historic properties by NPS and possibly by local governments, it is somewhat difficult to grasp how these policies will be concretely realized as the plan is implemented.

The plan puts a good deal of emphasis on the implementation of land use planning at the local level. Inasmuch as these decisions are largely controlled at the local level, this direction is sound. Along the lines of this approach, we would recommend that the plan include a much stronger emphasis on the implementation of historic resource protection at the local level.

1

Our office currently administers a program which could help fulfill this need. The Certified Local Government (CLG) program, established pursuant to the National Historic Preservation Act, promotes the enactment of local historic preservation ordinances to establish programs to designate and protect historic properties within the local jurisdiction. Those programs meeting certain requirements are "certified" by our office and the National Park Service, work closely with our office in program development, and are eligible to apply through our office for federal grants for survey and planning work.

2

345 KELLOGG BOULEVARD WEST / SAINT PAUL, MINNESOTA 55102-1906 / TELEPHONE: 612-296-6126

1. The text states that there should be a strong emphasis on historic resource protection at the local level. To further emphasize this, additional detail on the certified local government program was added to the Cultural Resources Management section of the plan.

2. This was added to the plan.

Under these ordinances, the local governments survey and designate historic properties, review building and demolition permits for designated properties, and conduct other preservation planning activities. If comprehensive and effective protection of historic resources in the MNRRA corridor is to be achieved, programs of local designation and protection are vitally important. Currently, only five of the local governments in the MNRRA area have local preservation ordinances.

3

One way to integrate the CLG program into the MNRAA plan would be to include the State Historic Preservation Office in the list of "partners" (page 76 of the draft plan). Our roles could include:

*promote the enactment of new local historic preservation ordinances
*offer technical assistance to communities in establishing local preservation programs
*work with local preservation commissions to integrate MNRAA policies and objectives into local preservation plans
*help fund local historic preservation survey and planning efforts through the CLG grants program

(Of course, our office also plays other roles related to Section 106 review that also could be included in this list.)

4

2. To a large extent, the activities which have occurred in the corridor have strong ties to the entire region and represent a focal point for the historical story of the Upper Midwest. The Mississippi River Overview on pages 123-127 might be expanded so that the context of the corridor's history is better interpreted.

3. We recognize that the list of historic properties included on pages 128-131 is meant to be illustrative. However, we have some concern that the individual resources significant at the state and local level are omitted from the list and that this omission may imply that their preservation and treatment is less important. Further, we also recognize, realistically, that the classification of "local, state, or national significance" has not always been uniformly applied to properties registered at different points over the past 25 years. Because of these reasons, and because the National Register recognizes properties of national, state, and local significance as all being worthy of preservation, we would urge that properties significant at the local or state level are fully integrated into the plan.

5

4. The discussion of compliance with Section 106 of the National Historic Preservation Act (pages 181-182 of the draft plan) acknowledges that additional consultation on compliance will take place before the final plan is issued. As part of that discussion, we would like to clarify some items on the tentative list of actions

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3. The State Historic Preservation Office was incorporated into the Partner Roles section.

4. This is not critical to a comprehensive plan and can be developed in follow-up history research.

5. This information is too lengthy and detailed for this plan. The text does state that all national register properties are important, but, due to space limitations, they are not all included.

on page 181. We would also like to discuss how 106 review might apply to actions undertaken by non-federal agencies operating under the MNRRA plan, given the revised definition of "undertaking" in the National Historic Preservation Act as amended in 1992.

6

5. The design guidelines (Appendix C) should incorporate reference to the Secretary of the Interior's Standards for Rehabilitation for historic properties. Other sections of the plan could reference the Secretary of the Interior's Standards for Archaeology and Historic Preservation, as appropriate.

6. We reaffirm the need for a comprehensive historic properties survey, including consideration of historic landscapes in the corridor.

7

7. The report indicates that the proposed Harriet Island Interpretive facility contains no known historic properties. Although the need for an archaeological survey is indicated, there is no mention of a survey for history/architecture resources. In fact, the Harriet Island Pavilion is listed on the National Register. The effect of the proposed project on this building - and on any significant associated landscape elements - will need to be evaluated.

We look forward to further conversations with you with regard to this planning effort. If you have questions or concerns in regard to our comments, please contact Dennis Gimmestad at 296-5462.

Sincerely,

Britta L. Bloomberg

Britta L. Bloomberg
Deputy State Historic Preservation Officer

BLB:dmb

cc: Martha Frey, Minneapolis Heritage Preservation Commission
Beth Bartz, St. Paul Heritage Preservation Commission
Sharon Marko, Newport Heritage Preservation Commission
Bob Vogel, Cottage Grove Advisory Commission on Historic Preservation
John Grossman, Hastings Heritage Preservation Commission
Betsy Doermann, St. Anthony Falls Heritage Board

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6. This was added.

7. This was added to the plan and potential impacts analyzed in the environmental consequences section.

Minneapolis Park & Recreation Board

September 10, 1993

JoAnn Kryal, Superintendent
Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418, Box 41
St. Paul, Minnesota 55101

Dear Ms. Kryal:

Thank you for attending our July Board meeting and presenting the Draft Comprehensive Management Plan Environmental Impact Statement for the Mississippi National River and Recreation Area. We recognize the tremendous amount of time and energy expended by the Coordinating Commission and National Park Service in preparing this extremely important and comprehensive document. We truly appreciate the Park Service's efforts.

Enclosed is the Minneapolis Park and Recreation Board's response to the Draft Plan. If you have any questions, please contact me at (612) 661-4800.

Sincerely,

David L. Fisher
Superintendent

DLF/ck

Enclosure

President:
Scott Neiman

Vice President:
Kathryn F. Thurber

Commissioners:
Patricia D. Baker
Tom Baker
Walter Bratt
Dale W. "Skip" Gilbert
Patricia Hillmeyer
Naomi Loper
Annie Young

Superintendent:
David L. Fisher

Secretary:
[illegible] Feldman

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THE MINNEAPOLIS PARK
AND
RECREATION BOARD

Response to the

Draft Comprehensive Management Plan

Environmental Impact Statement

for the

Mississippi National River and

Recreation Area

September 10, 1993

RESPONSE TO DRAFT COMPREHENSIVE MANAGEMENT PLAN
ENVIRONMENTAL IMPACT STATEMENT FOR THE
MISSISSIPPI NATIONAL RIVER AND RECREATION AREA

The Minneapolis Park and Recreation Board has historically viewed the Mississippi River as a world class resource to be treasured, protected and enjoyed by residents and visitors alike. From its very beginning, the Park Board has endeavored to acquire and develop public open space on the River. Form North Mississippi Regional Park, Boom Island Park, Nicollet Island Park, the Central Riverfront, East and West River Parkway, Minnehaha Park and smaller parcels, the Board now owns over 62% of an estimated 21.25 miles of river shoreline within the City limits of Minneapolis. In the past twenty years alone, nearly 50 million public dollars have been spent on shoreline acquisition and development. These efforts have stimulated an estimated $500 million in private development along or near the River. Perhaps more importantly, increasing public ownership has fostered greater stewardship of the River and associated natural resources.

- **MNRRA - a Great Opportunity**

With the passage and implementation of the legislation for MNRRA, there has been a real opportunity for the Coordination Commission and the National Park Service to develop a plan which transcends all our boundaries and individual enterprises and creates a grand, inspiring, and well deserved vision for the River and all of the Metropolitan region.

- **Draft Plan Lacks Inspiration**

Unfortunately, we believe that the Draft Comprehensive Management Plan Environmental Impact Statement has fallen well short of that goal. To its credit, the document is a wonderful compendium of information about the river, the corridor and the multitude of historical, cultural, economic, environmental, recreational, scenic and interpretive resources. However, an effort to satisfy all of the special interests, the draft plan lacks the clarity, scope, inspiration and strategies to move the Mississippi River and Corridor from its current state to a desired condition.

1

MPRB Response to MNRRA Plan

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1

1. The plan includes far-reaching visions for the corridor and builds on existing plans to achieve those visions.

MPRB Response to MNRRA Plan

- **"BALANCE" Avoids Issues**

A significant portion of the plan describes the wide variety of land uses, activities, etc. along the entire corridor. In this context, the word "balance" is used throughout the document. This concept is open to a wide degree of interpretation and thus provides inadequate guidance for future development. We advocate the deletion of the word "balance" altogether (pages 19, 30, 37, 55, 59, etc.). We are most concerned that the plan does more to avoid the issues than providing direction with which to address them.

2

- **No Change - Not a Plan**

This problem of issue avoidance is most evident in the proposed plan which includes no change to existing development within 300 feet of the shoreline. If status quo for something as significant as shoreline development is a basic tenet of the plan, we really question the vision, or a lack of, in this plan.

3

- **Develop Plan Based on the Uniqueness of Different Segments**

While we strongly advocate Alternative B with regard to Riverfront Land Use, we propose substituting portions of Alternatives A, B and/or C within the proposed plan. We fully concur on the need to create a vision and conceptual master plan for the entire corridor, but it has to be flexible enough to address the unique issues and accommodate a wide range of activities. In our past experience, we have approached sections of the river much differently depending upon its prevailing use. Our plans for the very natural river gorge between Franklin Avenue and Lake Street are much different than the more industrial section between Lowry and Broadway or the development area between Hennepin Avenue and Central Avenue. As such, the design criteria must reflect and respect these many facets and dimensions for the plan to succeed.

4

- **Base Plan on Interpretive Themes**

We would also encourage you to consider using the interpretive themes outlined on pages 53 - 56 as an outstanding framework from which to organize, present and sell the plan. These themes capture the real spirit and importance of the proposed area and this plan.

2

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2. The word "integrate" has been added in an attempt to satisfy this concern.

3. It is not technically correct to say the plan includes no change to existing development within 300 feet of the shoreline (or the riverfront area). It encourages some relocation of inconsistent uses and it encourages shoreline cleanup and restoration. It advocates more shoreline trails and open space, floodplain and wetland restoration, and finally, as areas are redeveloped over the long-term, it is hoped that further improvements can be made. The plan was revised to clarify that it encourages some improvement over the long-term and promotes sensitivity in design in existing developed areas.

4. Text was added to further recognize that there are different segments of the corridor that would be managed differently.

• **St. Anthony Falls - A World Class Interpretive Opportunity**

5 In view of the importance of interpretation to the River we want to reiterate our belief that an outstanding opportunity exists to create a world class interpretive center in conjunction with the St. Anthony Falls Historic Preservation Area. Instead of a traditional center which largely begins and ends in the building, the center would enable the visitor to experience, understand and appreciate the tremendous number of amenities found nearby. **The quality and quality of these amenities warrants a larger interpretive facility than recommended** (20,000+ square feet versus 12,000) Such a facility would create not only greater critical mass for the area in an interpretive sense, it would provide greater impetus for economic development nearby. Once again, Minneapolis would be physically connected to the River. The potential for riverfront development has not been fully studied or documented, but we believe the additional potential far exceeds the long-term capacity.

• **Open Space Opportunities Require a Strategy**

The draft plan map on page 145 identifies the tremendous opportunities for public open space within the corridor. These are especially prevalent at both the upper and lower ends of the 72 mile stretch. However, the plan does not present a forceful strategy to take advantage of these opportunities. The Park Board views such a strategy as a critical element of this plan and one which the National Park Service could play a significant role.

6 By virtue of the inclusion of the River in the National Park System, private contributions may be easier to solicit for land acquisition or development. A trust fund could be established. These opportunities must not be lost.

• **Dynamics of the Metropolitan Area Are Not Considered**

7 From a broader perspective, the draft plan does not appear to consider one of the most significant issues facing the Metropolitan Region. The possible relocation of the Twin Cities International Airport. The preferred site within the search area is very close to the south portion of the corridor and if chosen, would have a substantial impact on MNRRA. Yet, it is not discussed or analyzed in the plan. It should be since the dynamics of this and other river-related development have tremendous impacts upon the region's and Minnesota's overall economy.

5. While these estimates are preliminary and subject to refinement during project design, this facility should provide orientation needs and emphasize getting visitors out to see the significant cultural resources in the historic district. Extensive river-oriented exhibits or other media are not envisioned for the building. Other partners could exceed the estimated space if the need is established. The plan was revised to emphasize that the total size of the facility is approximate and subject to change based on further discussions by the involved partners and the final mix of activities. The NPS portion of the partnership is currently estimated to be about 6,000 square feet, but this estimate would be reconsidered during additional planning.

6. This idea was added along with the possibility of a land trust for the corridor.

7. See responses to comments G-15-2 and G-22-1.

- **Preservation and Economic Development are Compatible**

8 During the past twenty years, the Minneapolis Park Board has had substantial experience in the development dynamics within the river corridor. The results have been quite positive for recreation, preservation and economic development to be considered simultaneously rather than separately. They are not mutually exclusive. Preserving and developing the River has, in fact, been a significant economic development tool in Minneapolis.

- **Summary**

In short, we believe the draft plan has failed to synthesize the multitude of viewpoints into a long range, visionary plan for the Mississippi National River and Recreation Area. Further, it has not provided a clear and forceful strategy to achieve the visions described in the current plan.

Our sincere desire is to create an exemplary plan which will move us away from the age old argument of economic development versus environmental protection. A great plan will do both and we would like to see such a plan for this great river and the people who use and enjoy it.

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8. This idea was added.

DAKOTA COUNTY
HIGHWAY DEPARTMENT
14955 GALAXIE AVENUE, 3RD FLOOR
DAVID L. EVERDS, P.E.
COUNTY ENGINEER
(612) 891-7100
Fax (612) 891-7031
APPLE VALLEY, MINNESOTA 55124-8579

September 9, 1993

JoAnn Kyral
Superintendent
Mississippi National River and Recreation Area
175 East Fifth
Suite 418, Box 41
St. Paul, MN 55101

Re: Draft Mississippi National River and Recreation Area (MNRRA) Comprehensive Management Plan and Environmental Impact Statement

Dear Ms. Kyral:

The Dakota County Board of Commissioners on July 27, 1993 passed a resolution regarding comments on the Draft MNRRA Comprehensive Management Plan and Environmental Impact Statement. At that time they directed staff to submit comments to the commission regarding transportation, economic, and recreational issues. The Dakota County Highway Department and Office of Planning have reviewed the Draft MNRRA Plan and Dakota County's comments pertaining to transportation are enclosed.

The County understands the need to protect the river corridor and appreciates the efforts of the National Park Service in the development of this plan. However, the transportation needs, to provide a quality of life demanded in this region, must be incorporated into the plan.

The Mississippi and Minnesota Rivers form the boundaries separating Dakota County from Minneapolis and St. Paul. Dakota County with a 43% increase in population from 1980 to 1990, is the fastest growing county in the seven county metropolitan area. In the next 30 years, the Metropolitan Council projects Dakota County will have 26% of the growth in the entire metropolitan region. Therefore, this plan has far reaching impacts on the development of the County.

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COMMENTS

1 We are concerned with the plans lack of intermodalism. Dakota County has several modes of transportation and bridges that are impacted by this plan. Examples include Dakota County as the potential site of a new international airport, the seven river terminals located in the County, and roads within the park corridor that are integral to the economic viability of the region.

2 The plan also has a lack of specificity in providing guidance for future project designs. Specific guidelines should be provided for activities and land uses, not left open for various interpretations. For example, are all

3 highways contained within the corridor governed by parkway design standards or just roads within 300 feet of the river? To carry this example further, what are the road design standards for a parkway?

Therefore, the transportation impacts of this plan are critical to the County. In response, County staff have made both general and specific comments to the plan which are attached.

We appreciate the opportunity to comment on the Draft Master Plan and EIS. By incorporating comments from the metro and local planning agencies, we trust the Commission will produce a plan providing for the economic and recreational resources of the metro area.

Very Truly Yours,

David L. Everds

David L. Everds, PE
Dakota County Engineer

CC: Dakota County Board of Commissioners
The Honorable Bruce Vento
The Honorable James P. Metzen
The Honorable Thomas Pugh
The Honorable Robert Milbert Jr.
Commissioner James Denn
Brandt Richardson
Louis Breimhurst
Jack Ditmore

Q:MNRRA2

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RESPONSES

1. See responses to comments G-15-2 and G-22-1. This is beyond the scope of the plan.

2. See responses to comments G-15-2 and G-22-1.

3. This was clarified. The policy covers all roads in the corridor, with an emphasis on the riverfront area. The term "parkway" was dropped.

COMMENTS

BY: DAKOTA COUNTY PHYSICAL DEVELOPMENT DIVISION
OFFICE OF PLANNING & HIGHWAY DEPARTMENT

ON: MISSISSIPPI COMPREHENSIVE MANAGEMENT PLAN
ENVIRONMENTAL IMPACT STATEMENT

DATE: SEPTEMBER 9, 1993

Dakota County understands the unique opportunity to protect and provide for the development of the Mississippi National River and Recreation Area (MNRRA) as outlined in the Management Plan and the Draft Environmental Impact Statement. While the plan covers many areas thoroughly, we have concerns regarding transportation issues. Dakota County has multiple modes of transportation impacted by the plan, yet the only modes covered specifically are commercial navigation and bicycle/pedestrian.

Dakota County has seven river terminals located on the rivers in the area specified in the plan. The surface transportation necessary to this activity utilizes the County road network. According to the Metropolitan Council in 1984 there was a direct economic impact of $38 million and 1,000 jobs related to commercial navigation in Dakota County. These terminals handled 16% of the region's river barge activity. A recent study indicates that shifting less than one million tons of cargo from water routes to trucking routes could result in 141 accidents per year and would add 241 trucks a day, six days a week to the region highways. The plan does not address the relationship between roads/trucks and barges. The economic, social and environmental impacts of eliminating trucks on parkways need to be addressed

Dakota County is the site of a potential new airport for the region. Construction of this potential new airport will require additional or upgraded bridge crossings of the Mississippi and Minnesota Rivers. Such construction will also require upgrading or additional roadways which may be in the river corridors. The plan does not address such possibilities.

Dakota County believes the plan needs to specifically address the following:

*The Metropolitan Council and the Transportation Advisory Board completed a Major River Crossing Study in 1989 which shows a high priority to reconstruct many Mississippi River crossing points. This study should be addressed in the plan.

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In Dakota County this specifically impacts the TH 61 Bridge at Hastings; the WAKOTA Bridge at Newport and South St. Paul; the I-35E Bridge; the TH 52/55 Study; the CSAH 24 toll bridge; and the Etter Bridge at CR 68 into Goodhue County.

4 *There are no maps included in this document of the metropolitan highway system which cross both the Minnesota and Mississippi Rivers in many places throughout the region. An inventory of all roads within the corridor and their functional classification should be included in the plan.

5 *The Metropolitan Council is in the process of revising the region's Transportation Plan to bring it into conformance with the federal Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA). The plan does not address either the region's transportation plan or the federal transportation act.

*The Metropolitan Council is also currently revising the Metropolitan Development Investment Framework which should also be reviewed for compatibility on development and investment issues.

The following specific comments in the plan are of concern:

Page 29:
"(11) Increase the capacity of existing bridges in preference to constructing additional bridges except where new bridges are included in approved metropolitan area plans. Develop parallel architecturally compatible bridges next to existing bridges to increase capacity instead of new separate bridge crossings in the same traffic corridor."

6 This statement appears to preclude new rivers crossings regardless of need. The longevity of this plan should not prevent those assigned the tasks of planning and making transportation decisions for the area the ability to do so. The plan should be consistent with the Major River Crossing Study and the Transportation Policy Plan which is being revised in accordance with the Intermodal Surface Transportation Efficiency Act (ISTEA) 1991.

For example, the plan should not be able to preclude the construction of a future river crossing between Washington and Dakota Counties. Based on Metropolitan Council growth projections for Dakota and Washington Counties, there will eventually be the need for a future corridor crossing. Dakota County agrees that transportation planning needs to take into account both economic and environmental concerns. However, this draft plan prevents local agencies from working with Mn/DOT and the Metropolitan Council to provide the most effective system by eliminating options that would otherwise be available to the transportation system.

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4. The base maps show major roads. Additional information is not critical to finalizing the comprehensive plan, but much is included in the geographic information system database at MNRRA headquarters. Some tabular data was added to the appendix.

5. A reference was added to regional transportation planning and the Intermodal Surface Transportation Act.

6. The subject policy was revised to reflect this comment (see response to comment G-15-12).

Page 29:
"(17) Incorporate scenic parkway road design standards and architectural treatments into road reconstruction, or improvement projects in the corridor, with primary emphasis on parallel roads in the riverfront area and bridges over the river."

7

A definition of "parkway road design standard" is needed. The definition should not preclude truck traffic in all areas of the corridor. The river is a transportation corridor. In order to move goods to and from the river, a network of roads that accommodates truck traffic is required. For example, the border of the corridor in a portion of Dakota County is TH 55 and TH 56. These highway segments directly serve Koch Refining and the barge terminals at Pine Bend and South St. Paul. The plan states in Appendix C that "Roads within 300 feet of the river should be limited to scenic drives and parkways providing recreational access to the river..." . The plan fails to specifically address the roads that do not strictly meet the guidelines as outlined. The plan needs to inventory and address each roadway in the corridor.

The impact of limiting truck traffic in this corridor has not been evaluated in this DEIS from the regional economic perspective or the additional demand that would be placed on other roadways.

Based on these concerns, we suggest a revised or Supplemental DEIS be completed evaluating the social, economic, and environmental impact of decreasing vehicle capacity and rerouting truck movements along and accessing the corridor. The analysis should include:

8

*Inventory of all roads within the corridor and their functional classification;

*Determination of which roads would be designated as "parkways" including a definition of "parkway";

*Determination of the feasibility of roads losing truck capacity;

*Determination of alternative truck routes;

*Determination of additional roadways needed to be constructed for these routes to function at an appropriate level of service;

*Evaluation of the social, economic, and environmental impact of lost roadway capacity and from rerouting truck movements including increased noise, air

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7. The plan was revised to state that scenic road design concepts are encouraged, which would include many ideas from parkway design, but the plan drops the term "parkway" from the policy, which implied to several reviewers that it would have precluded truck traffic.

8. The revised policy makes this analysis unnecessary. Some transportation data were added as an appendix.

emissions, energy use, neighborhood disruption and cost to consumers; and

9 *The plan needs to include the Transportation Policy Plan, the Metropolitan Development Investment Framework, the Major River Crossing Study and the Dual-Track Airport Study.

Dakota County supports the Minnesota Department of Transportation's Detailed Comments of the Draft Comprehensive Management Plan of the Environmental Impact Statement Mississippi National River and Recreation Area, dated August 19, 1993 including Commissioner James N. Denn's cover letter.

P:MNRRA

9. References were added to the Land Use section of the plan for these studies.

DAKOTA COUNTY
DIVISION OF PHYSICAL DEVELOPMENT
14955 GALAXIE AVENUE
DEPARTMENTS OF –
• ENVIRONMENTAL MANAGEMENT
• HIGHWAYS
• PARKS
• SURVEY
• OFFICE OF PLANNING
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September 10, 1993

Ms. JoAnn M. Kyral
Mississippi National River and Recreation Area
National Parks Service
175 5th Street East, Suite 418, Box 41
St. Paul, MN 55101-2901

Dear Ms. Kyral:

Dakota County appreciated the opportunity to address the Mississippi River Coordinating Commission at the public hearing on the Comprehensive Management Plan that was held on July 28. This letter constitutes the page-by-page commentary on the Plan that was requested by Commissioner Gove at the public hearing.

In her remarks on July 28, Commissioner Richards noted the concern of the Board of Commissioners that the Plan, in effect, adds another layer of land management authority in the region. These comments were focused on the role assigned to the Metropolitan Council. Examples of these concerns and the need for further clarification include:

1 Page 20. The Plan states: "Metropolitan Council staff would provide assistance to local governments on plan development and revision to achieve conformance with this plan." The latter phrase (i.e., the underlined phrase) appears to add a regulatory authority to the Council and a mandate for local governments.

2 Page 77. The Plan calls for state legislation that would "require that all local plans and actions be consistent with the corridor plan." It goes on to state: "The Metropolitan Council would implement the state legislation, conducting a review of local comprehensive plans for consistency with the corridor plan." These provisions reinforce the idea of a new level of control in the region and the creation of an unfunded mandate for local governments.

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1. The plan has been revised to clarify that the Metropolitan Council would have no more authority then under existing state law.

2. The proposal for state legislation was dropped from the plan.

The Commission should address the dichotomy it appears to have created in the role of the Council (i.e., assistance versus regulation). As noted in Commissioner Richards' remarks, Dakota County opposes the addition of another level of land management in the County and questions the resources of the Council to carry out the new responsibilities the Plan appears to assign.

Further, as part of our comments on July 28, Commissioner Richards told the Commission that: "...we are concerned that the proposed management plan lacks many specifics that will define how many compromises in conflicting corridor uses will be reached.." Our written comments attempt to further focus these concerns. The comments below are listed in order by page. They are:

3 Page 29. "(11) Increase the capacity of existing bridges in preference to constructing additional bridges except where new bridges are included in approved metropolitan area plans. Develop parallel architecturally compatible bridges next to existing bridges to increase capacity instead of new separate bridges crossing in the same traffic corridor."

This statement appears to preclude new river crossings regardless of need. The longevity of this plan should not prevent those assigned the tasks of planning and making decisions for the transportation needs of the area the ability to make those decisions, when they need to be made.

4 "(17) Incorporate scenic parkway road design standards and architectural treatments into road reconstruction, or improvement projects in the corridor, with primary emphasis on parallel roads in the riverfront area and bridges over the river."

The type of roadway design referred to in this statement precludes truck traffic in many areas of the corridor. The river is a transportation corridor, as well as a recreational and environmental asset. In order to move goods to and from the river requires a network of roads that accommodates truck traffic. The balance of this need with recreational and environmental protection initiatives should be clearly dealt with in the Plan.

5 Page 49, fifth paragraph. The reference to "lampreys" in the Mississippi should be deleted. As far as we know, lampreys of the Agnatha form are not a problem in this stretch of the Mississippi River.

3. The policy was revised to address this and related comments. See response to G-15-16.

4. The policy was revised to address this and related comments. See response to G-30-7.

5. This reference was deleted.

Page 3

6 Page 55, third paragraph. The reference to the Mississippi River providing "waste dilution and dispersal" should be reworded or qualified so that this "use" cannot be misinterpreted as desirable or legitimate.

7 Pages 85 and 86. In our view, the text is not clear on whether the Harriet Island facility would be financed by 50% matching grants, or by some other costing formula. The plan should be clarified.

8 Pages 64, 65, and 86. The text reference to the interpretative site in Hastings should perhaps be changed to an interpretive center in the Hastings "area", in light of the apparent unavailability of the Old Courthouse as a site.

9 Page 117, *first* paragraph. The discussion on bald eagles should reference that not only do eagles winter here, but that a pair of these raptors established a nest inside the boundary of Spring Lake Park Reserve this summer.

10 Page 120, fourth paragraph. The Mississippi River is not the primary source of drinking water for the Metro area. As described in paragraph five, the suburbs all make use of groundwater.

11 More broadly, while the plan covers many areas thoroughly, we have concerns in the absence of specific references to ground transportation. The only transportation areas mentioned are ~~commercial navigation and bicycle/pedestrian.~~ The plan does not address the relationship between roads/trucks and barges.

Dakota County has seven river terminals located on the rivers in the area specified in the Plan. These terminals handled 16 percent of the region's river barge activity. A recent study indicates that shifting less than one million tons of cargo from water routes to trucking routes would add 241 trucks a day, six days a week to the region's highways.

12 Further, Dakota County is the site of a potential new airport for the region. If a new international airport is located in Dakota County, it would require additional or upgraded bridge crossings of the Mississippi and Minnesota Rivers. Such construction will ~~also require upgrading or additional roadways which may be in the~~ river corridors. The Plan does not allow for these possibilities, should the decision be made to build a new airport.

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6. This is one function of a "working river," but the statement is not intended to imply that the river should be degraded from this use.

7. This was clarified to state that funding would be requested through the federal appropriation process to build the NPS interpretive center. However, private donations might also be used.

8. The text was revised accordingly.

9. Specific geographic references to eagle nests are not included in the final plan (which will receive wide public distribution) to help protect the nest sites and prevent disturbance during the nesting season.

10. This sentence was revised to address the comment.

11. See responses to comments G-15-2. This is beyond the scope of the MNRRA plan.

12. See responses to comments G-15-2 and G-22-1. Except for NPS facilities, the plan is not site specific. Also see G-15-16 concerning bridge crossings.

For these reasons we believe that the Plan needs to specifically address the following:

13

- Major River Crossings. Metropolitan Council and the Transportation Advisory Board completed a Major River Crossing Study in 1989 which shows a high priority to reconstruct many Mississippi River crossing points. Further, the Plan contains no maps of the metropolitan highway system which crosses both the Minnesota and Mississippi Rivers in many places throughout the region. Such maps should be added.

14

- Regional Transportation Plans. The Metropolitan Council is in the process of revising the region's Transportation Plan to bring it into conformance with the federal Intermodal Surface Transportation Act 1991 (ISTEA). The Plan does not address either the region's transportation plan or the federal transportation act.

We hope that these comments will be useful to you in making the Plan more accurate and comprehensive. Please call our office if further explanation is needed in regard to these Plan comments. In addition, you will be receiving comments from the Dakota County Engineer which relate specifically to highway and bridge issues; the comments are consistent with this letter.

Dakota County understands the unique potential to preserve and enhance the development of the Mississippi National River and Recreation Area as outlined in the management plan, and looks forward to meeting with the Natonal Parks Service and the Coordinating Commission on improved management of the Mississippi River Corridor.

Sincerely,

Jack Ditmore, Deputy Director
PHYSICAL DEVELOPMENT DIVISION

cc: Dakota County Board of Commissioners
The Honorable Bruce Vento
The Honorable James P. Metzen
The Honorable Thomas Pugh
The Honorable Robert Milbert Jr.
Commissioner James Denn
Brandt Richardson, County Administrator
Louis J. Breimhurst, Physical Development Director

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13. A reference to this study was added to the Land Use section of the final plan.

14. A reference to this plan was added.

Metropolitan Waste Control Commission
Mears Park Centre, 230 East Fifth Street, St. Paul, Minnesota 55101-1633
612 222-8423

September 10, 1993

National Park Service
Mississippi National River and Recreation Area
175 East Fifth Street/Suite 418
St. Paul, MN 55101

Attention: Ms. JoAnn Kyral
Superintendent

Dear Ms. Kyral:

On behalf of the Metropolitan Waste Control Commission, I would like to present our comments on the Draft Comprehensive Management Plan/Environmental Impact Statement on the Minnesota National River and Recreation Area.

In general, we support the effort being made to improve the overall management of this vital resource. Our comments focus mostly on a handful of environmental compliance and environmental protection issues.

As you are aware, the Metropolitan Waste Control Commission (MWCC) was created by the Legislature in 1969 to collect and treat wastewater for the Minneapolis/St. Paul metropolitan area. Our service area encompasses most of the seven county metropolitan area, serving 105 municipalities of various sizes and a population in excess of two million residents.

The MWCC works under the policy direction of the Metropolitan Council and is accountable to a number of regulatory agencies for compliance with environmental laws and regulations, in particular the Minnesota Pollution Control Agency and the U.S. Environmental Protection Agency.

If you have any questions or feel we can be of further service, please give me a call.

Sincerely,

Louis R. Clark
Chair

Equal Opportunity/Affirmative Action Employer

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Metropolitan Waste Control Commission
Mears Park Centre, 230 East Fifth Street, St. Paul, Minnesota 55101-1633
612 222-8423

METROPOLITAN WASTE CONTROL COMMISSION COMMENTS ON THE DRAFT COMPREHENSIVE MANAGEMENT PLAN ENVIRONMENTAL IMPACT STATEMENT

September 10, 1993

GENERAL

1 The Draft Comprehensive Management Plan (Draft) on page 228 states that "waste treatment systems in the metropolitan area" are all owned and operated by the Metropolitan Waste Control Commission (MWCC). In fact, the MWCC owns and operates only the major municipal wastewater treatment plants and approximately 470 miles of the sewage collection system in the corridor. The municipalities own their local wastewater collection systems, including most of the collection systems responsible for combined sewer overflow impacts on the river, and some industrial facilities have their own treatment facilities or pre-treatment facilities.

Recommendation: Re-write the language to clarify existing jurisdictions.

WATER QUALITY ISSUES

2 1. The EIS does not address the various number and characteristics of NPDES permittees in the corridor, despite the statement on Page 96 that the NPS would set up "its own supplemental air and water quality monitoring program to identify noncompliance and pursue corrective action."

On what authority does NPS pursue environmental monitoring which is currently the responsibility of the MPCA (as well as the MWCC, pursuant to its environmental permits) in the rivers? What evidence exists that any supplemental monitoring is required?

Recommendation: Authority for environmental monitoring needs clarification.

2. The Draft language seems to focus on the MWCC's Metropolitan Wastewater Treatment Plant. Other types of discharges, including treated cooling water and industrial wastewater, are apparently ignored. It seems that a reasonable expectation would be the total number of NPDES permittees discharging into

Equal Opportunity/Affirmative Action Employer

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1. This was corrected.

2. The alternative referenced by the commenter on p. 96 of the draft environmental impact statement was not selected for the final proposed plan. This detail on permittees is not essential for a comprehensive management plan.

the river within the corridor (which, of course, may be physically located outside of the actual corridor) be listed, and a brief characterization of the types of discharges, with their potential impacts on the river.

3 **Recommendation:** The EIS needs to more clearly describe the administrative role of the NPS in environmental regulation and its integration into existing environmental regulatory programs. Any environmental monitoring needs to be coordinated ~~with extensive current monitoring programs.~~

3. On page 120 under the Water Quality section, there are several references to "contaminated sediments", "exceedances of discharge standards", "considerable pollutant load", "heavy metals", etc. The comments appear to be general with no statistical evidence or clarification as to references.

4 **Recommendation:** Clarify information sources and clarify statements.

NON-POINT SOURCE CONTROL STRATEGIES

4. The corridor includes the Minnesota River from river mile 4.0 to its confluence with the Mississippi. All indications are that the Minnesota is a major contributor to the water quality problems on the Mississippi. The Draft Plan does not describe the involvement of the NPS in water quality planning and permitting on the Minnesota, despite the statement that the nonpoint pollution would continue to be a major problem "if managed under existing programs without the extra emphasis that a MNRRA plan and program would provide."

Page 97 also includes the statement that the NPS "would work more extensively with other agencies to speed the cleanup of the Minnesota River." It remains unclear how the NPS has influence upstream and outside of the corridor on the Minnesota or the Mississippi. The number and diversity of governmental agencies involved in nonpoint source assessment and planning is already cumbersome. How MNRRA plans contribute to stream improvement are unclear.

The report does not discuss the impacts of storm water on the MNRRA plan. Storm water has a significant impact on the remaining water quality impairments. What does MNRRA propose for storm water management? The plan needs to recognize the significant public costs of further storm water management and nonpoint source pollution minimization.

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3. The NPS role in environmental regulation was clarified in the Plan Implementation section.

4. References were added.

5 **Recommendation**: The NPS needs to clarify its authority regarding water quality planning and nonpoint source control strategies to assure integration with the existing programs. In addition, the unmet needs of current strategies need to be delineated.

HAZARDOUS WASTE SITES

5. Page 113 includes a heading "Hazardous Waste Sites." But the heading does not indicate that the 114 sites apparently include permitted facilities as well as the Superfund sites. In addition, the NPS indicates that any cleanup costs will be borne by the city. According to Superfund, municipalities have limited liability in any cleanup activities. The assumption that the city would be willing to assume unlimited liability and clean up any hazardous waste contamination may be premature.

6 **Recommendation**: The EIS should list each of the Superfund sites, and possibly include their impacts on the corridor. There may be circumstances where a trail use may not be possible due to an identified closed and sealed Superfund site.

AIR QUALITY ISSUES

6. The Draft document does not mention or address the identification of the MNRRA corridor as a federal non-attainment area for small particulate matter (known as PM-10).

7 **Recommendation**: In the final EIS report, the NPS should include the PM-10 non-attainment area in its evaluation of air quality impacts.

7. Page 162 of the Draft Plan states: "Continued NPS participation in reviewing federal regional air quality permits would assist in preventing deterioration of the corridor's air quality from pollution sources outside the MNRRA boundary."

The plan is unclear as to what regulatory authority the NPS has in review of air quality permits (including indirect source permits). The EPA has delegated the operation of the Clean Air Act requirements to the MPCA; therefore the MPCA is

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5. The Natural Resources Management and Plan Implementation sections of the final plan were revised to clearly state that the Environmental Protection Agency and the Minnesota Pollution Control Agency have the primary regulatory authority for pollution control in the corridor. The National Park Service would work closely with existing programs to complement the activities of those agencies with lead roles in water quality issues. Generally speaking the NPS role would be primarily in education and in review of water quality plans and projects requiring federal permits. NPS review of permit applications would be concurrent with other reviews and would not add another layer of review. A subsection was added to the Partner Roles section of the plan for the Minnesota Pollution Control Agency. It emphasizes their critical lead role in implementing pollution prevention and control policies in the MNRRA plan.

6. This information is not essential for a comprehensive management plan/environmental impact statement but is available in the geographic information system database and is on file at MNRRA headquarters.

7. This was added to the Description of the Environment section of the FEIS.

the operator of the federal and state air permitting programs.

8 **Recommendation:** The NPS could review and comment on air permits as does any other governmental body impacted by the issuance of a permit. Additionally, the air quality current condition and impacts of MNRRA need more thorough analysis than appears in the current document.

COSTS AND PRIORITIES (FINANCIAL PLAN)

8. On Page 85, under the category of "Costs and Priorities (Financial Plan)" the NPS estimates that the development costs for an interpretive facility at St. Paul/Harriet Island would total about $8,347,000 for about 19,000 square feet. With about $1.6 million added for site surveys and design costs, the total cost of the facility proposed is estimated at about $9.95 million.

As an agency that has been involved with considerable construction projects over the past several decades, including many large projects currently underway, the MWCC believes that the Draft cost figure presented on Page 85 is higher than we would anticipate for the project described.

9 **Recommendation:** The NPS should revisit the cost estimates presented for the St. Paul/Harriet Island facility, in particular, and the other facilities described in the Draft.

End of MWCC comments

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8. The NPS role was clarified in the final plan.

9. Additional explanations for the cost estimates were added. The details of the estimates were moved to the appendix to emphasize their preliminary nature.

ROD GRAMS
8TH DISTRICT, MINNESOTA

COMMITTEE ON BANKING, FINANCE AND URBAN AFFAIRS
SUBCOMMITTEES:
HOUSING AND COMMUNITY DEVELOPMENT
FINANCIAL INSTITUTIONS SUPERVISION, REGULATION AND INSURANCE
CONSUMER CREDIT AND INSURANCE

COMMITTEE ON SCIENCE, SPACE, AND TECHNOLOGY
SUBCOMMITTEES:
ENERGY
TECHNOLOGY, ENVIRONMENT AND AVIATION

1713 LONGWORTH BUILDING
WASHINGTON, DC 20515-2306
(202) 225-2271

DISTRICT OFFICE:
2013 SECOND AVENUE NORTH
ANOKA, MN 55303
(612) 427-0121

Congress of the United States
House of Representatives
Washington, DC 20515-2306

September 10, 1993

Ms. Joann Kyral
Superintendent
MNRRA
175 East Fifth Street
Suite 418
St Paul, MN 55101

Dear Ms. Kyral:

I wish to express my appreciation for the effort already invested in the formulation of the current Draft Plan proposed by the Mississippi National River and Recreation Area (MNRRA). We are truly fortunate to have such a valuable resource as the Mississippi River in our region and I know we all want to see it managed wisely, using its full potential for both commercial and recreational use, while protecting the environment.

The purpose of the Draft Plan was to fulfill the mandate of the public law (PL100-696) that originally established MNRRA. Specifically, the law was written to recognize the historical, recreational, scenic, cultural, natural, economic and scientific resources derived from activities along the river. While extensively detailing most of these areas, the inventory of economic activities is noticeably absent from the Plan. The economic benefits of this working river, and the effect the plan will have on economic activity, should be more fully developed.

1 Local government authorities have a proven track record of integrating the unique impact of the river into their local plans and ordinances. Yet, while stating that local control is integral to fulfilling the objectives of the law, the Plan also indicates that "state legislation should be sought to require community plans to be updated to conform to this plan" (pg. 24). This initiative, coupled with the increased involvement of the DNR and the Metropolitan Council in the review of variance requests, suggests that local authority may indeed be reduced.

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1. The proposal for state legislation was dropped from the proposed action.

2 The importance of the river as it relates to transportation highlights the need to specifically define and catalogue each road, railway and bridge within this corridor. Attention to details relating to current use and projected future needs are critical since the plan will be in place for decades after the original authors have moved on. Lack of specificity in this area could allow an unintended interpretation and ultimately hinder necessary development. It could also result in increased costs of shipping, and cost thousands of current and future jobs.

3 Constituents of mine who own homes along the Mississippi River are also concerned with the potential negative impact of this Plan. It is difficult to determine the criteria that will be used in developing the extensive bike/walkways along this corridor. While we understand that it is not the intent of the National Park Service to acquire land, the Plan does state that local governments should pursue the development of easements along the river for public use. There is no disputing the fact that the river is a community resource, but the potential for riverfront property owners to be unfairly burdened is a real concern. Property rights should not be trampled and safety and security for residents should not be ignored.

It is apparent that there is still much that needs to be discussed in creating a final Plan. I hope that proper time is given to consider these critical issues. I appreciate the opportunity to participate in this process.

Sincerely,

Rod Grams
Member of Congress

RG:tpe

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2. See responses to comments G-15-2 and G-22-1.

3. A sketch was added to show how the trail could be routed around single-family neighborhoods.

City of Mendota Heights

September 10, 1993

TRANSMITTED VIA FACSIMILE
ORIGINAL TO FOLLOW

Ms. JoAnn M. Kyral, Superintendent
National Park Service
Mississippi National River and Recreation Area
175 Fifth Street East, Suite 418 Box 41
St. Paul, MN 55101

Dear Ms. Kyral:

Thank you for the opportunity to submit to the National Park Service our comments related to the Draft Comprehensive Management Plan and Environmental Impact Statement related to the Mississippi National River and Recreation Area (MNRRA). Over the past weeks, the Mendota Heights City Council has discussed the elements of the draft Plan and on September 7, 1993 the Council adopted the attached Resolution No. 93-46 and authorized its transmittal to the National Park Service by the September 10, 1993 deadline for receipt of public comments.

In the Resolution, the Council acknowledges the time and effort the National Park Service and the Mississippi River Coordinating Commission have put forth in preparing the draft Plan. In addition, the Council goes on record in support of the goals set forth in the federal legislation which originally established MNRRA, and in favor of a balanced approach to the use and development of the Mississippi River corridor, recognizing the importance of the economic as well as recreational and environmental attributes of the river.

Nonetheless, the Council has deep concerns with a number of provisions contained within the draft Plan. As a result, a number of specific changes are requested to the document. Please refer to the attached Resolution - Items 1 through 4 for further details.

As further noted in the Resolution, the Council has asked for a written response by the National Park Service to the comments and concerns raised in the Resolution. I am hopeful such a response can be received within 30 days. Should this expectation be unrealistic, please advise me of a more realistic time frame.

1101 Victoria Curve · Mendota Heights, MN · 55118 452-1850

Thank you again for the opportunity to provide the attached comments. Should you have any questions regarding our response, please feel free to call me at your convenience.

Sincerely,

CITY OF MENDOTA HEIGHTS

Tom Lawell
City Administrator

MTL:kkb

Attachment

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STATE OF MINNESOTA)
COUNTY OF DAKOTA) S.S.
CITY OF MENDOTA HEIGHTS)

I, Kathleen M. Swanson, duly appointed and acting City Clerk of the City of Mendota Heights, Minnesota, do hereby certify that the attached Resolution No. 93-46, "A RESOLUTION COMMENTING ON THE MISSISSIPPI NATIONAL RIVER AND RECREATION AREA DRAFT COMPREHENSIVE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT," is a true and correct copy of said resolution on file in my office.

Signed and sealed by my hand this Tenth day of September, 1993.

Kathleen M. Swanson
City Clerk

(SEAL)

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CITY OF MENDOTA HEIGHTS
DAKOTA COUNTY, MINNESOTA

RESOLUTION NO. 93-46

A RESOLUTION COMMENTING ON THE MISSISSIPPI NATIONAL RIVER AND RECREATION AREA DRAFT COMPREHENSIVE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT

WHEREAS, the National Park Service and the Mississippi River Coordinating Commission are currently in the process of preparing a Comprehensive Management Plan and Environmental Impact Statement ("the Plan") for the Mississippi National River and Recreational Area (MNRRA), and

WHEREAS, the boundaries of the MNRRA include 72 miles of the Mississippi River, approximately 2 1/2 of which are adjacent to the City of Mendota Heights, and four miles of the Minnesota River, all of which is adjacent to the City of Mendota Heights, and

WHEREAS, the provisions of the Plan may serve to directly impact land uses, public infrastructure improvements, and public and private expenditures within our community, and

WHEREAS, the National Park Service has requested public comments on the Plan from all affected units of local government and other interested parties.

WHEREAS, the Plan focuses primarily on a "Proposed Plan" and, in less detail, discusses three alternatives, identified as Alternatives A, B and C. Consistent with the focus of the document, the City's comments will deal exclusively with the Proposed Plan.

NOW THEREFORE BE IT RESOLVED by the City of Mendota Heights, Dakota County, Minnesota, that the City supports the goals set forth in the Federal legislation which originally established the MNRRA and is supportive of a balanced approach to the use and development of the Mississippi River corridor, recognizing the importance of the economic, as well as recreational and environmental attributes of the corridor.

BE IT FURTHER RESOLVED that the City appreciates and recognizes the efforts of the Mississippi River Coordinating Commission and the National Park Service in preparing the Plan which is currently before the public for comment. In response to this request for comment, the City believes changes in the Plan are necessary in the following areas:

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COMMENTS

1) In general, many sections of the Plan are written in a very non-specific and vague manner which makes an accurate determination of the true impacts of the Plan on Mendota Heights extremely difficult. These concerns primarily relate to permitted land uses and environmental protection mandates. 1

2) The Plan encourages collaboration and cooperation amongst various units of government, yet bestows upon the Metropolitan Council and the Department of Natural Resources authority to interpret and enforce the provisions of the plan. The Plan further contemplates the passage of State legislation which would usurp local land use control from local elected officials and force municipalities to comply with the provisions of the Plan as interpreted by the Metropolitan Council and the Department of Natural Resources. 2

Past experience indicates local elected officials have done a commendable job protecting the Mississippi River over the years and the need for additional units of government to become involved in the land use planning process through MNRRA is questionable. The role of these two agencies is too strongly stated throughout the Plan - their involvement in land use matters should not be as a "veto authority", but rather as a "collaborative partner" capable of providing technical assistance to units of local government. Within the guidelines of the Plan, land use controls should ultimately remain with local governing units.

3) As described above, the Plan contemplates special legislation being passed by the Minnesota Legislature which would require cities to update their Comprehensive Land Use Plans to reflect the dictates of the MNRRA Plan. Land owners within the community have relied upon longstanding community zoning classifications and comprehensive planning efforts over time. Despite assurances given in the Plan to property owners, mandated revisions to longstanding community land use plans may expose units of government to future liability and damage claims. Units of local government should not be forced into assuming this liability, and should receive from the National Park Service a guarantee that cities and counties will be held harmless and not responsible for any defense costs and judgements arising from such claims. 3

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RESPONSES

1. The comprehensive management plan is a conceptual policy plan, providing a framework for more detailed planning and decision making.

2. The proposal for state legislation to mandate consistency was deleted from the proposed plan.

3. The proposal for state legislation was deleted.

4) As required by the Legislation which established MNRRA, a financial plan to "provide and support the public improvements and services recommended in the Plan" is an important element of the document. The current section on financing does not adequately identify the many costs which will be incurred by local governments in complying with the provisions of the Plan. Nor does the Plan address the ongoing maintenance and public safety issues associated with new trail construction within the corridor. This section of the Plan needs to be expanded to more fully and accurately identify and describe the true public costs associated with its implementation, and clearly indicate the sources and methods by which these costs will be financed.

4

BE IT FURTHER RESOLVED, staff is directed to forward this resolution to the National Park Service and the Mississippi River Coordinating Commission requesting a written response to the concerns and objections raised in this Resolution.

Adopted by the City Council of the City of Mendota Heights this 7th day of September, 1993.

CITY COUNCIL
CITY OF MENDOTA HEIGHTS

By _____
Charles E. Mertensotto
Mayor

ATTEST:

_____
Kathleen M. Swanson
City Clerk

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4. Costs of compliance are difficult to predict. Communities would implement those sections of the plan that go beyond existing state and regional requirements on a voluntary basis. The costs would depend on the amount of compliance and the degree of nonconformity. The Economic Impacts section was amended to identify (in a nonquantified way) that there would be additional costs to local governments for plan implementation, including trail construction and maintenance.

STATE OF
MINNESOTA
DEPARTMENT OF NATURAL RESOURCES
500 LAFAYETTE ROAD, ST. PAUL, MINNESOTA 55155-4037

OFFICE OF THE COMMISSIONER

DNR INFORMATION (612) 296-6157

September 9, 1993

JoAnn Kyral, Superintendent
Mississippi National River and Recreation Area
175 E. Fifth St., Suite 418, Box 41
St. Paul, MN 55101

Dear Superintendent Kyral:

The Minnesota Department of Natural Resources (DNR) is pleased to provide comments on the Draft Comprehensive Management Plan and Environmental Impact Statement for the Mississippi National River and Recreation Area (MNRRA). DNR has a long history of involvement with MNRRA and the organizations that helped create it; Deputy Commissioner Ron Nargang is currently our voting member on MNRRA's Mississippi River Coordinating Commission.

While we have a number of comments, DNR is generally supportive of the draft plan and the direction in which it proposes to take management of this important Mississippi River resource. We are fully supportive of plans to provide federal funds to DNR to develop land use rules consistent with the plan and to assist local governments in adopting consistent ordinances and in administering the program. We also strongly support the proposal for a significant National Park Service role in interpretation, including visitor facilities at Coon Rapids, St. Anthony Falls, Harriet Island and Hastings. Interpretation is an activity that the National Park Service does extremely well, and we look forward to a broadened NPS role in the metropolitan area.

While we support the proposed plan, there are elements of Alternative B that we feel could be incorporated into the plan to provide better protection for natural resources without damaging the balanced approach the plan tries to strike in this urban area. There are three changes on page vii, for example, that we would suggest: first, under "Land Use/Landscape Character Concept", add to the proposed plan "wildlife habitat preservation"; second, under "Open Space", add to the proposed plan "protect sensitive areas and emphasize resource protection"; third, under "Resource Management", add to the proposed plan "extensive research efforts". 1

Following are specific comments on the plan.

The DNR has significant concerns that the focus of the draft plan with respect to natural resources is to preserve their **appearance**, but is silent on the significance of the biological diversity, biological processes or functions, species or community composition; the plan does not adequately focus on the biological values of the river corridor and on methods to protect those values. The plan needs a greater emphasis on protecting fish and wildlife resources, including bottomland forests, bluffland and riverine habitats. 2

AN EQUAL OPPORTUNITY EMPLOYER

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1. This was added to the plan as suggested.

2. Biological diversity and habitat protection concepts and policies were added to the plan in several places.

3 The plan fails to acknowledge the national significance of this corridor for migratory birds and other wildlife resources. The corridor is extremely significant for migrating birds (both waterfowl and upland species), as well as other wildlife. A proposed 40-100-foot vegetative buffer along the shoreline is not adequate as a vegetated habitat for migratory or resident birds or other wildlife. While NPS is to be commended for calling for the use of native vegetation in the corridor, the plan should clarify that the use of native vegetation does not mean it's alright to plant three oak trees in a parking lot and consider that equivalent to a native woodlot. Nor is native vegetation limited to tree species---in utility rights of way, for example, it would be inappropriate to plant trees.

The plan's persistent and implicit assumptions that open space is equivalent to wildlife habitat suggests a lack of understanding of wildlife resources, ecological theory and the basic biology of natural resources. "Open space" in an urban setting often means mowed lawns, trimmed trees, exotic vegetation, removal of aquatic vegetation, and the influx of dogs, cats and people.

4 The plan should acknowledge when there is intent to provide a mowed-lawn kind of open space versus open space that has wildlife habitat values or maintains native plant communities.

Small strip corridors along the riverbank do not provide all of the kinds of habitat needed, of course; there needs to be some large blocks of undisturbed land in order to provide adequate habitat. Four of the large tracts of land in the corridor that are currently undeveloped and constitute important habitat for wildlife are already slated for park development in some form

5 or other: Lilydale, Battle Creek, Grey Cloud and Spring Lake. While the draft plan's focus on recreation is understandable, it is critical that fish and wildlife values and native plant communities also receive attention when planning for these large areas is undertaken.

The draft plan fails to recognize the importance as wildlife habitat of the small island acreage

6 currently owned by NPS. If these islands are to be transferred to other land managers, it should be done in a way that ensures maintenance of the natural cover and establishment of these lands as "sanctuary areas" to ensure they will continue to serve as valuable wildlife habitat. It is exactly these islands and forested bottomlands where there is enough habitat left to sustain the bald eagles that are returning to the river corridor. It is important that these islands not become boater picnic areas or campsites. The decision on transfer of these lands should be made only after the detailed resources management plan called for on page 39 has been completed and the habitat value of these islands assessed.

On the first page of the plan's summary the assertion is made that "the people of the Minneapolis-St. Paul metro area have managed the resources of the Mississippi River corridor...(and that) this management has preserved the river in good condition..." While this may be true in some areas, it is less accurate in others. It might be wise to reword this passage to more accurately reflect the present-day condition of the riverine environment, and perhaps to distill some of the lessons learned from this "management" approach. Later in the same

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3. Statements on the national significance of the corridor for migratory birds were incorporated into the document in several places. An appendix listing wildlife in the corridor was also added.

4. This has been clarified in the final plan.

5. This concept was added to the plan.

6. The plan was revised to clarify that the islands would be managed as natural areas regardless of who manages them.

7 section (page v), it is suggested that decisions about commercial navigation uses should be based on "resource values, emphasizing minimal impact on aquatic life." This is a laudible goal, so long as recreational river uses are considered "resource values", and with the understanding that visual and aesthetic impacts must also be monitored and evaluated along with aquatic impacts.

The DNR applauds the plan's balance between passive and more active visitor uses and recreational activities. A broad, balanced mix of visitor uses, in areas most suitable for these activities, is preferable to a strict emphasis on particular uses.

We welcome the plan's emphasis on trail and public water access development. This focus will complement the ongoing efforts of DNR and the Metropolitan Council, particularly in the central metropolitan area (between I-694 and I-494).

8 DNR reviewers suggest that specific examples be used and case studies cited whenever possible to illustrate recommended actions.

9 The draft plan makes a number of references to increased enforcement of floodplain, wetland, pollution control and other state laws and regulations (see pp. 40-41, for example) that suggest significant increases in workload for DNR's Conservation Officers. With additional visitor use of the corridor, there are likely to be significant additional demands on Conservation Officers for recreational enforcement, as well. While the draft plan suggests DNR will be provided with funds to cover its costs in developing and administering land use regulations, the increased costs of providing the services of Conservation Officers has been overlooked in the plan.

10 While the plan does clarify that NPS will not actively manage land or water or their use, the plan does not make clear who will provide that management. It seems appropriate there be a statement that the corridor's land, water and their uses will be managed by state and local governments as they are elsewhere in the state, but also consistent with this plan.

11 The discussion at the bottom of page 20 leaves the mistaken impression that standard floodplain rules requiring damaged structures be removed from the floodplain would somehow not apply here. That is incorrect; floodplain zoning requirements would not change in the corridor. The text should be rewritten to clarify that, outside the floodplain, the intent of this program is preservation of existing characteristics, and an existing dimensionally substandard structure that is destroyed could be rebuilt on the same footprint.

12 "Office buildings" should not be included with the list of river-related land uses that are permissible within 300 feet of the water (page 24). We are not convinced there is any location

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7. Scenic and recreational resources are included in the list of resources cited in the MNRRA act and as such would be factored into the decision process. The legislation stipulates that the area is intended to protect resources and provide for their use and enjoyment by the public. Under this mandate recreational use would be given due consideration. The subject sentence was revised as stated in the response above to reflect this and related comments.

8. This is not feasible with local control and the many specific situations in the corridor. This is not a site-specific plan.

9. The MNRRA plan stresses a partnership approach. The final plan more thoroughly acknowledges that there would be costs for all partners in the corridor to implement the plan. Funding would be sought by the partners for cooperative activities.

10. Clarification of this type was added throughout the document.

11. The text was clarified and the subject sentence was removed. The final plan more clearly states that existing floodplain management regulations would continue to apply.

12. See responses to comments G-8-7 and G-10-1.

along the river where there would be economic hardship created if an office building were to meet a 300-foot setback.

13 We have a related concern with respect to housing and retail, entertainment and commercial uses. There are areas (Coon Rapids, for example) where there is a consistent pattern of development of housing within 300 feet of the river; additional housing there would not be objectionable, but there are other areas where development is currently sparse and housing within 300 feet of the water would seem inappropriate. The same is true of retail/commercial uses: our sense of what is acceptable would be much different in downtown Minneapolis as compared to Grey Cloud Island. These concerns underscore the diversity of this 72-mile reach of river corridor and the need for plans and subsequent land use regulations to be flexible. Within that envelope of flexibility, however, should be the primary emphasis that land uses within the 300-foot corridor should be river-related.

DNR in July published a draft Metro Region Forest Resources Management Plan. Several elements of the draft MNRRA plan are related to this new DNR draft plan. The statement about preserving natural shoreline areas at the bottom of page 26 is consistent with the draft Metro Region Forest Resources Management Plan (although preserving a natural area only 40

14 feet wide would not be consistent). The same is true of item 6 on page 40 (dealing with use of chemicals) and item 14 on page 41, which encourages alternatives to grass lawns. The draft forest plan and the draft MNRRA plan should be reviewed for consistency (page 83).

15 Table 1 on page 27 appears to contain two errors. The top center box, which says "Critical Area - N/A, DNR Shoreland Rules - 300 feet" should instead just say "None". The existing critical area and shoreland program do not have any riverfront location criteria that can in any way be compared to that found in the proposed plan. In the right column, fourth box down, it states the structure height requirement is "25 feet high for structures 100-200 feet from the river." Shouldn't that actually say 0-200 feet?

16 There is a recommendation on page 29 (item 12) to "establish a floodplain encroachment ceiling". DNR has already done so, and in fact floodplain encroachment (including some projects that have been approved but not yet constructed) in Pool 2 has already reached the limit. For additional information, contact John Stine in the DNR's Division of Waters, at (612) 296-0440.

17 The variance policy discussion on page 29 fails to reiterate one important criteria from state statutes: the plight of the landowner is due to circumstances unique to the property, not created by the landowner.

We have some concern with item 3 at the bottom of page 37. We have noticed the plan's writers go through several generations of confused writing that evolved into this statement.

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13. See responses to comments G-8-7 and G-10-1.

14. The DNR metro region forest plan is a draft and therefore was not included in the consistency list. No inconsistencies are known to exist.

15. The table was causing confusion for several reviewers and was deleted from the plan.

16. The revised policy says "enforce" the encroachment ceiling.

17. The variance criteria would conform to state statutes. The text was simplified to reflect this and to eliminate the list of criteria.

In an earlier draft, the authors had mingled two unrelated issues---boat wake damage and siting of barge fleeting areas. Boat wake damage concerns center on recreational craft; towboats create a slightly different kind of wake (and there are fewer towboats than recreational craft) and are not as great a concern with respect to shoreline damage from wakes. We have never had a concern with towboat wakes as they relate to location of barge fleeting areas. Towboat activities at barge fleeting areas have potential for environmental impact associated with propwash, but that involves bottom disturbance and sediment resuspension, not shoreline erosion. **18**

The discussion in the second paragraph on page 39 should go further to clarify that the National Park Service will fund scientific research on natural resource issues in the corridor. **19**

We remain concerned that there is not enough information available about the proposed "detailed resources management plan" discussed on page 39. This plan should do more than just identify research needs; it should identify significant natural resources in the corridor and should set out a strategy to sustain these resources (such as water quality, rare species and their habitats, or significant habitat for commonly occurring species and significant examples of natural communities like mixed oak forest or bluff prairies). We would like to see a timeline on when the National Park Service proposes to complete this detailed resources management plan and who you intend to have participate in its development. No major decisions on allocation of resources, divestiture of land, land acquisition, or development of trails, parks or other facilities should go forward until such an inventory of natural resources and a plan for their management has been completed. How can the National Park Service make land use decisions based on resource protection (see page 20, paragraph 3, line 4) when you have yet to define which resources are most important and which lands or waters harbor these resources? **20**

The list of visitor use activities on page 49 should include hunting, trapping and clamming. Subsistence living through angling is another activity that is common in the corridor. **21**

The assessment of fish and wildlife resources on pages 114-118 is quite perfunctory. It should be expanded upon, especially with respect to the national importance of the corridor to migrating birds and other wildlife, as noted above. The assessment of the corridor's value for bald eagles (pp. 116-117) fails to acknowledge the presence of breeding birds and the importance of the bottomland forested islands and wooded bluffs as breeding habitat. **22**

In preparing the final plan, NPS should remove the references to the locations of the heronries in the second to last paragraph on page 115 of the draft plan. There is no need to identify these colony sites so exactly in a public document. Any document that gets broad public distribution should not contain site-specific references to locations of natural resources that need protection from human disturbance. **23**

18. This policy was revised to include "bottom disturbance and sediment resuspension."

19. The National Park Service would work with corridor partners to facilitate funding for needed research. This would not be a major role for National Park Service funding, however.

20. Additional resources management planning and inventory work would be done as soon as the resources can be mustered to accomplish them. A prohibition on all these activities is not within the authority of the National Park Service, and it is unlikely that the corridor partners would agree to such a freeze on these activities.

21. Hunting was added to the list of encouraged activities.

22. This was added to the Description of the Environment section.

23. The specific references to these sites were removed.

Superintendent JoAnn Kyral
Sept. 9, 1993
Page 6

24 Table 10 on page 152 describes land uses in several categories. Is the area of floodplain and bluffland forest buried in that infamous category called "vacant"?

25 While the plan puts great emphasis on the retention of woody vegetation, it does not quantify the species composition, location or area involved except in landscape terms. It is difficult to develop a management plan for an undefined attribute.

26 The discussion of vegetation on page 172 could lead the reader to conclude the entire river shoreline is devoid of vegetation. There are long stretches of shoreline that are completely wooded and in a relatively undisturbed state.

27 The same section discusses the importance of restoring native vegetation. While that is excellent much of the time, it should be noted that it may be impossible in some areas. Construction of the lock and dam system greatly altered both the surface and groundwater regimes. This change has rendered it impossible for some tree species originally present to exist in the present environment.

28 The vegetative management guidelines in Appendix C need to provide some flexibility to allow the removal of trees (or groups of trees) with deadly infectious diseases (such as oak wilt, dutch elm disease) to prevent the further spread of these diseases, or to remove "hazard trees" that pose a threat to public safety (this is especially important in heavily used recreation areas).

While it is an important feature of the plan to protect visual and aesthetic resources through vegetative management, the plan should contain adequate flexibility to allow appropriate forest management practices.

29 The plan focuses extensively on the Harriet Island visitor center proposal, along with partner facilities at St. Anthony Falls, Coon Rapids and Hastings. The natural and cultural resources of Fort Snelling State Park, coupled with the Historic Fort, Mendota Historic District, Minnehaha Falls area and the Minnesota Valley Trail are so outstanding and obvious at the very center of this river corridor. They are identified briefly in the Existing Visitor Use/Interpretive Programs section (page 133), and on the Selected Existing and Proposed Interpretive and Educational Facilities Map (page 63), but are not adequately described in the plan considering their current importance. Fort Snelling State Park alone has 700,000 annual visitors and the historic fort another 250,000. The description in the plan of creating "critical mass" at Harriet Island seems to already exist in the Fort Snelling area. A more comprehensive discussion of the park and the resources there should be incorporated into several sections of the draft plan.

30 The draft plan states that NPS plans to "take the lead" in interpretation for the river corridor. What does this mean, and how does it follow from a charge to "coordinate" efforts along the

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24. Yes. This was clarified in the document.

25. This is beyond the scope of this plan. It was added as a subject for potential research to be identified in the resources management plan.

26. This was clarified in the subject section of the final environmental impact statement.

27. This was acknowledged in the Final Environmental Impact Statement.

28. The guideline was revised to address this concern.

29. The proposed Fort Snelling interpretive center was added as a cooperative interpretation facility in the final plan.

30. During public review of earlier project newsletters there was very strong support for the National Park Service having a lead role in interpretation. This should in no way imply that the National Park Service would do it all. The text was revised to state that the National Park Service would have the lead in coordinating interpretive planning and services in the corridor.

river? We welcome cooperation and coordination, but the plan leaves us with the impression that NPS is proposing only a bigger and better interpretive facility. As you may be aware, a new interpretive center is proposed for Fort Snelling. We are very close to obtaining funds for this much-needed facility, and are concerned about the impact the Harriet Island proposal would have on our facility.

Thank you for this opportunity to comment on this draft plan. The Mississippi River is clearly one of Minnesota's most important natural resources, and we look forward to continuing involvement with the National Park Service as we cooperatively manage the Mississippi National River and Recreation Area.

Yours truly,

Rodney W. Sando
Commissioner

cc: Ron Nargang
Steve Johnson

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ENERGY AND NATURAL RESOURCES
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September 10, 1993

Ms. JoAnn Kyral
National Park Service
Mississippi River Coordinating Commission
Mississippi National River and Recreation Area
175 East 5th Street, Suite 418
St. Paul, MN 55101

Dear Ms. Kyral and the MRCC:

I want to commend you on the fine work that your office and the MRCC have done in preparing the "Draft Comprehensive Management Plan Environmental Impact Statement" for the Mississippi National River and Recreation Area (MNRRA). I understand there have been a series of public meetings on the draft and that the comment period ends September 10. It is reassuring to know that public comments have been solicited on the draft management plan.

I want to begin my comments on the plan by referring to Congress' intent in establishing MNNRA. The findings of Congress in Sec. 701 (a) of the act state that the "Mississippi River Corridor within the Saint Paul-Minneapolis Metropolitan Area represents a nationally significant historical, recreational, scenic, cultural, natural, economic, and scientific resource." Congress also found that it is in the national interest to preserve, protect and enhance these resources and that state and local planning efforts along the corridor "provide a unique foundation for coordinating federal, state, and local planning and management processes."

According to the act, existing federal agencies had been unable to coordinate activities with local and state offices to "provide for adequate and comprehensive resource management and economic development consistent with the protection of the Mississippi River Corridor's nationally significant resources, and the public use and enjoyment of the area."

Congress established MNRRA to protect, preserve and enhance this nationally significant resource. The draft management plan is not simply another layer of bureaucracy which obstructs state and local agencies from doing their jobs. MNRRA was established so that all interests and resources could be integrated through comprehensive planning by local, state and federal agencies. Only by integrating our historical, recreational, scenic, cultural, natural, economic and scientific resources can we preserve the integrity of the 72 miles of the Mississippi that

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flow through the Twin Cities area.

The flood of the century has turned our attention to the awesome power behind a usually tranquil and predictable river. The value and importance of this river resource is often unappreciated because the public lacks access and an historical understanding of the river. I believe that a fully integrated management plan, relying on the vision and coordinating abilities of the National Park Service and the Mississippi River Coordinating Commission, can fully address the different needs of those using the river's resource.

1 The Mississippi is indeed a working river. The flood brought a halt to the barge industry and crop failures may further hurt the industry due to the lack of grain to ship. I believe that MNRRA can indeed impress upon our community the importance of the energy efficient barge industry to our economy. With bike and pedestrian paths along the river and barges moving goods on the river, we can only increase our appreciation and the environmental quality of the Mississippi.

The draft plan integrates the needs of the barge industry with a greater vision of the river. Fleeting activities will continue and are proposed to be located "preferably next to commercial or industrial areas." I understand there is some controversy involving proposed policy #25 on page 41 which states "Address the issue of contaminated river bottom sediments in the resources management plan, particularly in response to potential increases

2 in river traffic." Barge traffic needs sufficient dredging of channels and there are areas of the river being dredged that contain contaminated sediment.

MNRRA provides an opportunity to plan with the Minnesota Pollution Control Agency how to dredge contaminated sediment in an environmentally sound manner. While this type of dredging may cost more money, it is important that we as a society accept responsibility for the pollutants in the sediment as a result of the dumping practices of the 1960's and 1970's. The barge industry should not have to bear the full burden of the additional costs for environmentally sound dredging.

Another opportunity that MNRRA allows for is a comprehensive approach that relies on state and local governments to reduce the amount of toxins entering the river. Proposal #22 on page 41 has also generated some controversy. It states "Support existing programs to prevent, better manage, and decrease the volume of toxic wastes and toxic materials existing in the river corridor. Support additional efforts that would prevent the creation of new sources of toxic emissions to the air and water in the corridor."

3 Proposal #22 gives environmentalists and industry a common ground from which to work with state and local agencies to meet the proposal's goals. Both groups can agree that it pays to reduce the amount of toxic waste generated in industry. Industry has

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1. The plan was further clarified to show all areas of importance.

2. Dredging would continue under the lead management of the Corps of Engineers in cooperation with the interagency Mississippi River Resources Forum. This issue would also be addressed in the proposed surface water use management plan.

3. The subject policy was revised to address the concerns of several commenters, including business and environmental groups.

consistently found financial incentives to reduce the amount of toxins used at the front end to avert the high costs of disposal at the back end.

The Community Right-to-Know legislation has provided important information on the emissions of toxic waste to community and environmental groups. These groups have been able to use this information to educate our community and to encourage industry to use less toxins in their business.

I am encouraged by the steps the Metropolitan Council is taking to protect the river from non-point-source pollution and to protect wetlands that are vital to the health of the river and a much larger ecosystem. The draft also proposes both with #21 on page 41: "Increase enforcement of federal, state, and local floodplain and wetland protection policies and restore degraded wetlands to maintain and improve their natural cleansing abilities and protect water quality in the corridor." One of the recurring lessons we are learning from this year's flood is that wetlands play a very important role, both within MNRRA and throughout the entire Mississippi drainage basin, in mitigating flooding. 4

The river was a very special place to the indigenous people of the area. The settlements along the river and the burial mounds at Mounds Park in Saint Paul demonstrate the spiritual and physical significance of this river. I encourage MNRRA to assist Native Americans in establishing a spiritual cultural center in the corridor. 5

The proposed plan is an ambitious one aimed at preserving, protecting and enhancing a nationally significant resource. The draft has made important steps toward integrating not only the many different uses of the river but also the various federal, state and local governmental units to work together to accomplish the goals of MNRRA. I applaud the efforts of everyone involved and I especially appreciate the effort to include everyone in the comment process.

I pledge my support for federal funding to assist communities with the modification plans and to help the Metropolitan Council and the Department of Natural Resources in implementing their proposed responsibilities.

Sincerely,

Paul David Wellstone
United States Senator

PDW:sba

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4. The plan was revised to stress wetland protection more. The draft plan did have several strong policies on floodplain and wetland protection and restoration. Additional discussion on the relatively new state law addressing wetlands is provided. A statement was added that these issues would be an important part of the critical area planning program. A separate section on floodplains and wetlands was added to the Resources Management section to emphasize their importance.

5. The second interpretive theme was expanded to discuss more about the Native American culture and relationship to the river to emphasize the NPS commitment to the interpretation of this aspect of history. The proposed visitor center at Fort Snelling State Park was designated in the final plan as a cooperative center, with special emphasis on this theme.

Minnesota Pollution Control Agency

September 10, 1993

Ms. JoAnn Kyral, Superintendent
Mississippi National River and Recreation Area
National Park Service
175 East Fifth Street, Suite 418, Box 41
St. Paul, Minnesota 55101

Dear Ms. Kyral:

The draft Comprehensive Management Plan and Environmental Impact Statement (EIS) for the Mississippi National River and Recreation Area (MNRRA) has been reviewed by Minnesota Pollution Control Agency (MPCA) staff. In recent correspondence with Secretary Babbitt, I have identified concerns regarding the interpretation and implementation of Section 704(b)(1) of the MNRRA legislation which provides for the review by the Secretary of facilities or undertakings that are federally permitted or funded. Consequently, I have requested an authoritative response that will address these concerns. While awaiting this response, I wish to provide the following comments from staff.

In addition to the concern stated above, we believe that discussion of pollution control in the draft plan and EIS should be based on a clear explanation of the ~~relationship between the National Park Service (NPS) and the MNRRA Commission,~~ and the regulatory authorities and activities of the MPCA. However, the descriptions of the policies and actions, and the environmental consequences of the proposed plan and the alternatives, are ambiguous and give rise to differing interpretations as to how the NPS and the MNRRA Commission would interact with the MPCA or other agencies with regulatory jurisdiction within the corridor. We also believe that implementation of the proposed plan should not in any way add to the existing layers of authority in permitting and enforcement in the area of pollution control. We believe that the following concerns should be addressed in the revised comprehensive plan and, especially, during the preparation of the forthcoming natural resources management plan.

1

2 Page 37: Within the Commercial Navigation section, a greater acknowledgment of environmental concerns should be included. Specifically, Items 1 and 3 of the proposed policies and actions should include emphasis on monitoring the disturbance and resuspension of contaminated sediments from commercial river traffic. Additionally, no indication is given as to who would carry out these actions. Would it be the Minnesota Department of Natural Resources, the U.S. Army Corps of Engineers (COE), the MPCA, the NPS, or another agency?

3 Page 38: Within commercial navigation policy and action No. 7, it is stated that most dredge material placement areas have adequate capacity to maintain the nine-foot channel in the river corridor during the 10-15 year life of the plan. However, recent proposals under the MPCA dredge disposal review responsibilities related to the Section 401 Water Quality Certification and State Disposal System permits indicate that new dredge disposal sites are actively being sought within

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1. A Minnesota Pollution Control Agency (MPCA) paragraph was added to the Partner Roles section.

2. These concerns were incorporated into the policies.

3. While the draft plan states that most areas have adequate capacity to accommodate needs, it goes on to mention the need for additional areas and briefly explains the process for identifying new areas.

4 the MNRRA corridor. In addition, Appendix E suggests that the COE has a long-term permit with the MPCA to operate dredge disposal facilities. More correctly, the COE possesses a State Disposal System permit, which is subject to review and reissuance every five years.

5 Pages 40-41: The natural resource management policies and actions related to pollution control under the proposed plan emphasize preventing air and water pollution, and increasing efforts to control and clean up existing pollution problems. This, it is indicated, would be accomplished by increased monitoring and enforcement. Generally, these policies and actions reflect and are consistent with the existing policies and programs of the MPCA. However, while references are made to strict enforcement, ensuring compliance, evaluating standards, etc., there are no specific activities or mechanisms identified in which the NPS or the MNRRA Commission would engage in order to achieve the pollution control goals of the plan. Thus, it is implied that existing policies or programs will be unable to achieve the air and water quality improvement goals of the plan unless augmented or impacted in some way under the plan (see also Table 14 on page 158). Such implications are not appropriate unless accompanied by analysis and discussion of the existing pollution control programs affecting the corridor, and a clear explanation of the specific means by which the intended environmental improvements would be realized under the plan. Instead, the plan and the alternatives resort to broad conclusions about the environmental benefits of the plan without providing a supporting analysis.

6 We believe the plan should provide a meaningful and more complete discussion of existing pollution control programs and activities in the corridor. Such information would be necessary for consideration by the Secretary of the Interior in the future review of the plan to determine the adequacy of regulatory tools that are in place to implement the plan.

Page 40, Item 1: This item raises the question as to how the NPS and the MPCA would interact with respect to permitting and enforcement of new point source discharges within the corridor. The MPCA rules prohibit new wastewater discharges to the Mississippi River within that portion of the MNRRA corridor from the mouth of the Rum River in Anoka to the upper lock and dam at St. Anthony Falls. However, within the remaining portion of the corridor, the disposal of properly treated wastewater is a legitimate, permitted use of the river. While the MPCA does not prohibit new wastewater discharges below St. Anthony Falls, any new or expanded discharges in this segment would be regulated as necessary to prevent significant water quality degradation or violations of water quality standards. It is suggested that this item be reworded as follows.

7 1) Encourage compliance with existing air and water quality standards and provide incentives for reducing pollutant emissions and loadings beyond required levels. Potential new sources of pollution would be rigorously reviewed to maximize pollution prevention opportunities and to further reduce pollutant loadings' effect on the quality of the fishery in the corridor or the quality of drinking water supplies.

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4. This correction was made.

5. The text was revised to state that existing programs are adequate to accomplish pollution control. The approach would be to improve existing programs.

6. This was added.

7. This comment was incorporated to the referenced air and water pollution control policy 1.

COMMENTS

Ms. JoAnn Kyral
Page 3

8 Page 40, Item 2: By what process or mechanism would development standards be updated to reduce runoff? How would this complement and be coordinated with the existing educational, planning, and regulatory efforts of the MPCA, the Metropolitan Council, and cities within the corridor? Is anything implied which would be unique to the MNRRA plan?

9 Page 40, Item 4: It is stated that strict enforcement of existing pollution control regulations will be ensured. By what means will this occur and how would this action interface with MPCA enforcement programs that are guided by state standards, other state rules and statutes, and federal regulations? A partnership approach with industry may be highly desirable in this area given the large number of industrial facilities.

10 Page 40, Item 7: This item discusses the need to "...seek cleanup of corridor lands that are adversely affecting or may adversely affect the river environment..." What types of land would be defined as needing cleanup? In terms of solid waste, measures are already in place to address known problems being caused by abandoned dumps and landfills. It is unclear what types of activities would be undertaken to identify and initiate cleanup of lands within the corridor.

11 Page 40, Item 8: The MPCA noise rule provides specific standards to prevent adverse impacts on park areas. How might this policy/action affect these standards or their enforcement?

12 Page 40, Item 12: A higher priority rating for corridor state and federal Superfund sites is proposed to complete cleanup of contaminated sites more quickly. The current priority ranking system considers a number of factors when assessing a site's effect on human health and the environment. Thus, it may be inappropriate to bypass cleanup of sites which may be outside of the corridor in favor of one within the corridor. Changing the existing ranking system would be necessary to accommodate sites within the corridor, if special priority were to be given to them.

13 Page 40, Item 13: What actions could be taken under the plan to increase efforts to achieve swimmable and fishable water quality standards?

Page 41, Item 17: The following wording is suggested.

14 17) Cooperate with the MPCA in establishing ongoing water quality monitoring programs to determine the types, loadings, and sources of pollutants discharged to tributaries of the Mississippi River within the corridor, and work with watershed management organizations to incorporate monitoring results during periodic revisions of local water plans.

15 Page 41, Item 18: Who would implement the policy of requiring marinas to have dumping stations?

RESPONSES

8. Text was added under Natural Resources Management to clarify the approach advocated in the MNRRA plan.

9. Text was added to show support for ongoing MPCA programs.

10. Text was added expressing support for existing pollution programs.

11. This would be determined during the evaluation process proposed in policy number 8 under Natural Resources Management. Noise standards would continue to be enforced under existing authorities.

12. The intent of this policy is to recognize that the cleanup sites are now in a congressionally established unit of the national park system and therefore deserve updated consideration in regard to impacts on the environment. Care would be taken to ensure that sites outside the corridor that pose a significant risk to human health are not diminished in priority relative to sites of lower risk inside the corridor. This means that, other things being equal, preference would be given to a site in the corridor. The policy was revised to reflect this.

13. This is a comprehensive policy plan that supports efforts to achieve water quality standards, but it is not a detailed action plan for reducing pollution in the corridor.

14. The statement was revised to reflect this comment.

15. The policy was changed to support the establishment of a program to require dumping stations for new marinas and encourage adding dumping stations to existing marinas. The Department of Natural Resources would have the lead in implementing this policy.

Ms. JoAnn Kyral
Page 4

16 Page 41, Item 20: What expertise would the NPS offer with respect to the review of air emissions permits issued under the federal Prevention of Significant Deterioration (PSD) rules? What would be the framework, content, and timing of such review? Would this extend to PSD permits for facilities located outside the MNRRA corridor? The nature of this or other review activities must be fully delineated to ensure that the regulatory activities of the MPCA are not impeded in any way.

17 Page 41, Item 21: It is suggested that the word "Increase" in the first sentence be replaced with "Encourage."

18 Page 41, Item 22: Existing rules and regulations are protective with respect to new or expanding sources of pollutants with toxic effects. The following wording is suggested.

22) Support efforts to reduce or prevent adverse impacts from toxic emissions to the air or waters within the corridor through effective regulation and the implementation of pollution prevention programs at industrial facilities within the corridor.

Page 41, Item 23: The following wording is suggested.

19 23) Work with the MPCA and the Minnesota River Citizens Advisory Committee to identify ways to support and supplement efforts to prevent and control pollution, especially phosphorus loading, to the Minnesota River which directly affects the quality of the MNRRA corridor.

20 Page 41, Item 25: The issue of contaminated river sediments within the corridor is important with respect to the attainment of water quality goals. It is suggested that the Resource Management Plan develop strategies to address this issue. These strategies might include restrictions placed on dredging, the establishment of a coordinated toxics monitoring program, monitoring of the effect of river traffic on the resuspension of sediment, the development of biological criteria to more effectively assess the biological integrity of the corridor, and the review of loadings and standards applied to toxic pollutants.

21 Page 76: The intent of the plan is to develop coordination and consistency among agencies having jurisdiction within the corridor, particularly local units of government. It is noted that the NPS and the MNRRA Commission may review and comment on federally funded or permitted activities within the MNRRA corridor as discussed in the Partner Roles on pages 76-79. However, the nature and timing of such review is not explained nor is it clear by what means the NPS or the MNRRA Commission would seek to impact the permitting decisions of state or local jurisdictions. Clarity is particularly lacking with respect to the MPCA, whose role as a partner in the implementation of the comprehensive management plan is not discussed. A related aspect that is not defined is the role which the NPS and MNRRA Commission would seek to play in attaining air quality, water quality, or other pollution control improvements. We do not believe it would be productive for the NPS to assume a lead coordinating role in an environmental

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16. NPS review of federal permits was clarified in the Natural Resources Management and Partner Roles sections of the final plan.

17. "Encourage rigorous" was substituted in place of "increase."

18. Policy 22 was revised to accommodate the comments of businesses in the corridor, environmental groups, and this commenter.

19. The policy was revised to reflect this comment.

20. These ideas were added to the subject section of the plan.

21. The plan was revised to reflect these statements. See responses to G-37-1 and G-37-16. The NPS role would be limited to review, and these reviews would be concurrent and within existing time frames to the maximum extent practical.

regulatory arena in which it has limited expertise. In addition, the suggestion that the NPS would act to streamline the regulatory process could actually increase the layers of government and the complexity of the process. The NPS role in this area should be limited to that of providing review and advice from the perspective of an agency seeking to balance competing uses of the corridor under the guidelines of the proposed plan. The plan should clearly recognize the authorities of the MPCA or other agencies in establishing and implementing pollution control goals within the corridor. This would not conflict with the environmental goals of the MNRRA plan since the pollution control policies and programs of the MPCA conform with all applicable federal legislation and regulations.

22 Page 84: Concerning the compatibility of the plan with other water quality plans and programs, it is stated that the MNRRA Commission would have oversight with respect to the implementation of the provisions of federal legislation by federal, state, and local agencies to ensure that water quality standards are met and improvement in overall water quality in the corridor is achieved. What is meant by this oversight is not explained in this section or in the foregoing section in which the proposed policies and actions on pollution control were presented (pages 40-41). This could imply that approval authority over federally funded or permitted activities will reside with the MNRRA Commission, something which is clearly not mandated by federal legislation. The degree of oversight and authority of the MNRRA Commission must be clearly defined with respect to its interaction with the MPCA.

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23 Page 89: With respect to Natural Resource Management under Alternative A (No Action), the first two paragraphs in the "Pollution" section should be deleted. These paragraphs overstate the potential consequences due to the absence of the proposed MNRRA plan by implying that the policies and actions on pollution control set forth earlier (pages 40-41) would not be carried out or would in some way be diminished. In this section it is indicated that without the plan there would be no additional emphasis on pollution prevention, no increased monitoring or enforcement, no new legislation to control pollution would be sought, additional incentives for pollution reduction would not be likely, fertilizer and pest control chemicals would continue to be used in residential and agricultural areas based on existing guidelines and regulations, there would be no overall policy discouraging the use of salt on icy roads, etc. However, no explanation is given as to how these goals would be accomplished due to the existence of the plan; it is simply assumed that they would occur. These statements are faulty since they do not recognize the dynamic nature of existing regulatory programs and their ability to adapt to changing pollution control needs and priorities. The effectiveness of these programs and their compatibility with the MNRRA plan have not been addressed or evaluated; yet, the implication seems to be that existing pollution control programs are inadequate in terms of meeting the new goals or priorities that might be brought about by the plan. It is suggested that these paragraphs be replaced with a more balanced discussion of the nature of existing programs.

22. The text was revised to clarify the commission's role in pollution control and plan implementation. The National Park Service and the commission do not have approval authority over the referenced permits.

23. These concerns were addressed in the subject section.

Ms. JoAnn Kyral
Page 6

24 Page 96: Under Alternative B (greater resource protection and enhancement) the NPS would take several actions, including monitoring and enforcement, which are already performed by the MPCA pursuant to federal and state mandates. The degree of improvement possible with this initiative is not clear. This alternative suggests that duplication of government activities will improve environmental quality.

25 Page 100: The authorities which would be granted to the MNRRA Commission under Alternative B clearly exceed its legislative mandate.

26 Page 103: The description of pollution control under Alternative C, natural resource management, is overly pessimistic. For example, a principal concern seems to be that "... no particular efforts would be coordinated to reduce the use of salt or of fertilizers and pesticides..." and that "Attaining swimmable and fishable water quality along the entire corridor would not be a high priority..." The accompanying discussion provides no support for such assertions. In reality, the MPCA does and will continue to pursue the programs and policies necessary for the attainment of these and other pollution control goals. The two issues cited are also quite problematic, especially when viewed from the perspective of a narrow, 72-mile segment of large river system. The General Concept Plan gives no specifics on the actions that would be taken to effect the policies and goals for these or other issues.

27 Page 107 (table): Here it is stated that, under the proposed plan, efforts to reduce pollution will increase. This would imply that these efforts will go beyond existing programs. However, the plan gives virtually no indication how existing programs would be affected, what changes would occur, or how they would come about. It also casts existing programs in a negative light as if they were static entities instead of programs which are regularly monitored and adjusted to respond to changes in the environment or the regulated community.

28 Page 113: The paragraph entitled "Hazardous Waste Sites," states that there are 114 sites within or near the corridor. It is unclear what types of sites these are and what criteria were used to categorize them as hazardous waste sites. It is stated that 19 of the sites are on the Superfund Permanent List of Priorities and 6 are on the national Superfund list. It seems likely that the sites so identified may comprise all MPCA-known sites within the corridor and that others may not necessarily be in the hazardous waste site domain.

29 Page 121: In the Affected Environment section, it is indicated that the State of Minnesota does not consider fish consumption advisories when determining fishable use support. This is incorrect. Fish advisories are used to establish use support as fishable waters.

30 Pages 161-162: In the discussion of the water quality impacts of the proposed plan, a tendency to overstate the positive impact of the plan is displayed at the top of page 162 where it is stated that, "Under the proposal, point source regulatory requirements would be attained and nonpoint pollution and runoff would be reduced, resulting in improved water quality, a healthier fishery, and

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24. This was clarified in the subject section.

25. This was clarified in the description of alternative B. Additional authorities would be needed if this alternative was selected.

26. This is clarified in the subject section.

27. The subject table was revised to address this concern.

28. This was clarified in the subject paragraph.

29. The subject statement was deleted.

30. The document was revised to clarify that the plan supports and encourages ongoing efforts by the Minnesota Pollution Control Agency.

improved fishing and swimming conditions." This is not really an assessment of the plan's impact, nor is it supported by an analysis of tangible program elements. Rather, it is a statement of goals that it is hoped will be achieved through policies and actions that have not been clearly defined or evaluated. This has created the impression that some form of direct or indirect intervention in MPCA regulatory programs is intended; something that is not mandated by the federal legislation. Note that Sec. 705.(a) states, "... lands and waters within the Area shall be administered under State and local laws."

31 Page 162: How would the NPS and/or the MNRRA Commission participate in reviewing federal regional air quality permits (Air Quality Section, last sentence)? How would this compare with current practices relative to other units of the Park System? What assurances would be provided to prevent such review from being unnecessarily burdensome or to prevent it from being used to obstruct permit or enforcement processes?

32 Page 169: The impact of the no action alternative concerning water and air quality is described as resulting in continued major and increasing problems unless the extra emphasis from the MNRRA plan is provided. What is the basis for such assertions?

33 Page 172: The water quality impact of Alternative B is presented as a conclusion without supporting analysis: "The stricter pollution prevention measures [what measures?] under this alternative would result in greater attainment [how?] of improved water quality and fishable and swimmable waters [as measured by what?]. What is the meaning and justification for the next sentence: "Efforts would also be undertaken to maintain a more consistent water quality standard at all points in the corridor." The following paragraph on the air quality impacts of Alternative B is preferable in that it acknowledges that improvements cannot be quantified in the document, an acknowledgment which is seldom made.

34 Page 176: The water and air impacts associated with Alternative C are described in a more appropriate manner. For example, with implementation of this alternative, it is stated that adverse water quality effects from greater development and resource-use activities "could result," a departure from the previous pattern of unsupported conclusions. It also recognizes that impacts "could be mitigated." The succeeding air/noise section also conveys an understanding of the inability of the document to accurately estimate impacts in these areas.

35 Page 227: The responsibility of the MPCA should be clarified to state that the agency issues permits for the storage, treatment, and disposal of hazardous "waste," not "materials." The MPCA also regulates the management of hazardous waste from the point of generation through generator licenses as do the metropolitan counties.

31. Clarifying text was added to the Plan Implementation section to address this comment. NPS review would occur within existing review processes and would be concurrent with other reviews to the maximum extent practical.

32. The document was revised to address this concern and clarify the impacts of the no-action alternative.

33. The subject portion of the document was revised to address this comment.

34. The comment is noted.

35. This change was made.

Ms. JoAnn Kyral
Page 8

Thank you for the opportunity to review and comment on this document. We look forward to developing an effective working relationship dedicated to the improvement and protection of the environment within the MNRRA corridor.

Sincerely,

Charles W. Williams
Commissioner

CWW:ns

cc: Peter L. Gove, Chair, MNRRA Coordinating Commission
Rod Sando, Commissioner, Minnesota Department of Natural Resources
James Denn, Commissioner, Minnesota Department of Transportation

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Minnesota Department of Health
Division of Environmental Health
925 Delaware Street Southeast
P.O. Box 59040
Minneapolis, MN 55459-0040
(612) 627-5100

September 10, 1993

JoAnn M. Kyral, Superintendent
Mississippi National River and Recreation Area
175 East Fifth Street
Suite 418
Box 41
St. Paul, Minnesota 55101

Dear Superintendent Kyral:

Thank you for the opportunity to comment on the draft comprehensive management plan/environmental impact statement for the Mississippi National River and Recreation Area.

The Minnesota Department of Health is committed to informing users of the Mississippi River about health concerns associated with the river. It is apparent from the management plan that you recognize potential health risks and have made provisions under the proposed plan and alternative B to prevent further degradation of water quality that leads to health concerns. In particular, we noted that the plan supports regulations that protect drinking water supplies and reduce contaminants that lead to fish consumption advisories. The plan also includes specific ideas to reduce the runoff and improper sewage disposal that lead to bacterial contamination.

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While these are a laudable goals, they are long term solutions to a current problem. In the interim, the plan should include provisions to advise or warn anglers of current health concerns. The Department of Health supports local units of government in making decisions to post health warnings. We urge you to consider posting health advisories concerning fishing and swimming at access points under your jurisdiction. 1

In addition, we also urge you to focus special environmental health education efforts on users of the river for whom English is a second language. We believe this group, which includes Southeast Asian and Russian immigrants, faces significant language and cultural barriers in using advisories.

Of course, the long term solution to the need to educate anglers about contaminants in fish is to reduce contaminants. Your plan correctly targets pollution prevention as an important management goal.

Sincerely,

Pamela Shubat

Pamela Shubat, Ph.D.
Section of Health Risk Assessment

PJS:rlk

An Equal Opportunity Employer

1. Health and safety warnings would be addressed in follow-up interpretive and educational plans and actions.

RESOLUTION 93-1

A RESOLUTION BY THE LILYDALE
CITY COUNCIL OF THE CITY OF LILYDALE, MINNESOTA
IN OPPOSITION TO THE DRAFT OF THE PROPOSED
COMPREHENSIVE MANAGEMENT PLAN ENVIRONMENTAL IMPACT STATEMENT
FOR THE MISSISSIPPI NATIONAL RIVER AND RECREATION AREA

WHEREAS, the City Council of the City of Lilydale, in response to the request for comments to the proposed Comprehensive Management Plan and Environmental Impact Statement of the Mississippi National River and Recreation Area, Minnesota, does hereby adopt this resolution as its formal response:

BE IT RESOLVED, that the City Council of the City of Lilydale, acting on the 30th day of August, 1993, states in the strongest possible terms its opposition to the draft Comprehensive Management Plan Environment Impact Statement presented to it and dated June, 1993, by the Mississippi Coordinating Commission and National Park Service.

1 **BE IT FURTHER RESOLVED**, that the City Council of the City of Lilydale, does further state and resolve that it will remain in opposition to any purported plan for the Mississippi River corridor that does not allow the City full discretion through its zoning code to protect the rights and interests of its residential neighborhoods and citizens living on or near the Mississippi River (which, in the case of Lilydale, Minnesota, is virtually all of its residents).

BE IT FURTHER RESOLVED, that the City Clerk-Treasurer is directed to forward this resolution to all appropriate authorities involved with the review of this plan, as well as any and all other affected municipalities and elected officials.

Passed unanimously by the City Council this 30th day of August, 1993.

Harvey Bream
Harvey Bream, Mayor

ATTEST:

Bernard J. Weitzman
Bernard J. Weitzman, Clerk/Treasurer

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1. The final plan emphasizes incentives and drops the proposal for state legislation.

WASHINGTON COUNTY
OFFICE OF ADMINISTRATION
PLANNING AND PUBLIC AFFAIRS DIVISION
GOVERNMENT CENTER
14900 61ST STREET NORTH, P.O. BOX 6 • STILLWATER, MINNESOTA 55082-0006
Office 612/430-6003 FAX 612/430-6017

Robert J. Lockyear
Director
Jane Harper
Physical Development
Lois Yellowthunder
Human Services

September 14, 1993

Ms. JoAnn M. Kryal, Superintendent
Mississippi National River Recreation Area
175 East Fifth Street, Suite 418
St. Paul, MN 55101

Dear Ms. Kryal:

Enclosed are the comments of the Washington County Board of Commissioners on the Mississippi National River Recreation Area Plan.

In conversation with your office, I was informed that the deadline was loose and that comments submitted after the deadline would be accepted. Please accept these comments as constructive suggestions that will make the plan more acceptable to local communities and will ultimately aid in successful implementation.

If you have any questions regarding these comments, please contact me at 430-6011.

Sincerely,

Jane Harper
Physical Development Planner

/pr

Enclosure

cc: Bob Lockyear, Planning and Public Affairs Director
Myra Peterson, Commissioner District 4
Chuck Swanson, County Administrator
Don Wisniewski, Public Works Director
Dennis O'Donnell, Senior Land Use Specialist

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DRAFT COMPREHENSIVE MANAGEMENT PLAN
ENVIRONMENTAL IMPACT STATEMENT
FOR THE
MISSISSIPPI NATIONAL RIVER AND RECREATION AREA

Prepared by
Mississippi River Coordinating Commission and
National Park Service

COMMENTS SUBMITTED BY
WASHINGTON COUNTY BOARD OF COMMISSIONERS
SEPTEMBER 7, 1993

The Washington County Board of Commissioners is pleased for the opportunity to provide comments on the Draft Comprehensive Management Plan/Environmental Impact Statement for the Mississippi National River and Recreation Area (MNRRA). Washington County has monitored the process of developing the MNRRA plan and has carefully reviewed the documentation provided. We would like to offer comments about the plan in general and about Washington County specifically.

In previous correspondence, the County stated its position that the plan:

1. Provide for a balance of interests and retain the multiple use nature of the corridor.

2. Recognize existing land uses and allow the existing property owners the right to maintain, replace, and enhance existing structures and facilities within the framework of city, township, county and state regulations.

3. Thoroughly examine the impacts of the proposed management plan on the local economy.

4. Propose a management framework that streamlines the bureaucratic process by building on existing governmental responsibilities, not enlarging it by creating a new management entity.

By in large, the proposed plan did not satisfactorily address these concerns. The plan is deficient in specifying exactly how it will provide for continued economic activity and development.

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1. The plan calls for balance and recognizes the multiple use nature of the corridor.

2. A statement on expansion was added (see response to comment G-24-2).

3. The analysis was done by a University of Minnesota professor and the NPS planning team at a level sufficient for a comprehensive management plan. Additional analyses would be done for community plans and on a project-specific basis as appropriate.

4. The proposed plan builds on existing agency responsibilities and processes; the final plan was revised to emphasize this.

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Residential/Commercial/Industrial Land Uses

5 The plan is very ambiguous in specifying what restrictions would be placed on expansion of existing structures. The river corridor is home to many businesses that contribute significantly to the local economies. Faced with uncertainty about how they could expand in the future these businesses will be reluctant to invest more in this area and might even consider relocating. Although the plan recognizes the river as a "working" river, it does not provide policies and programs for the commercial use of the area. Existing commercial and industrial land uses must be recognized for their contributions to the local, regional, and state economies and must be allowed to expand and flourish. As well, residents must be allowed to reside in their homes with complete assurance that they may maintain, improve, and replace their homes to meet changing circumstances.

The most significant part of the plan in achieving the desired vision for the corridor is the zoning/land use guidelines. The plan has made a good attempt to identify the types of land uses that should be allowed in the corridor. It is incumbent upon the local units of government to incorporate these into their comprehensive plans and zoning codes to the degree practical. The plan guidelines, along with the Critical River Corridor plans recently adopted by all communities, should provide adequate protection to maintain the character of the river as a "working" river. The uniqueness of each community reflected in the current development in the river corridor creates the river's charm. Uniformity in appearance is not the goal that should be strived for. Therefore, a flexible variance procedure must be provided to local units that ensures sensible planning and development.

6

Parks and Open Spaces

The Open Space and Trails Concept has insufficient detail to respond to. This part of the plan encourages development of a continuous trail system along the entire length of the river corridor. The plan does not delineate the actual location of the system segments; instead it relies on local governments to update their plans adding the trail segments and to acquire and develop the open space and trails. Under its responsibility laid out on page 77 to the Commission may ask that "more detailed plans be prepared" We suggest that, before this plan is approved, the Commission direct the NPS to prepare a detailed master plan for open space and trails along the corridor in concert with local units of government. Without this detail it is difficult to know what we are being asked to support.

7

The National Park Service needs to continue to have a presence in the corridor, but its presence should offer something unique. We submit that working with local units of government to develop a master plan for continuous open space and trail segments along the corridor and assisting in the plan implementation is that unique role.

2

5. The expansion issue was clarified in the final document. Individual communities would determine the details in their plans and ordinances.

6. The plan recognizes this need and seeks a balance between uniqueness and some level of consistency in resource protection, land use management, and design quality.

7. NPS staff met with the various communities to attempt to more specifically identify additional land with open space and development potential. This attempt was not totally successful, so it would not be possible to prepare an open space and trails plan within the time frame for completing the comprehensive management plan. The MNRRA plan gives high priority to the implementation of such a plan, and the document was revised to stress its importance. The more detailed analysis would be started immediately following approval of the Mississippi National River and Recreation Area plan.

Offering federal matching grant money to encourage local actions is an action that would greatly facilitate the implementation of the vision laid out in this plan. Encouraging local action with funding is especially important in developing areas where the cost of facilities is low but the potential to fund through tax dollars is lower than in more heavily developed areas.

The plan should recognize that both the Federal Government and the State of Minnesota are trying to reduce expenditures. Local units of government in Minnesota have been under strict levy limits for years and are now being strongly encouraged to cut spending. Without outside funding, this plan for parks and trails cannot be implemented.

8

Much of the text discusses interpretation, preservation, and recreation within the corridor, therefore, it was very disappointing to see no mention of the Grey Cloud Study area located on the lower part of the river in Washington County. The Grey Cloud Study Area meets and exceeds nearly all the above objectives and embodies the concept of a natural and scenic corridor.

This area has tremendous benefit for wildlife habitat and wetland interpretation; is extremely scenic; and has some of the most important Indian burial mounds in the Twin Cities that are available for interpretation. The Metropolitan Council has designated this area as an excellent example of Mississippi Flood Plain, one of ten regionally significant land types.

As the plan pertains to the conservation, protection, and interpretation of scenic, historical, cultural, natural, and scientific values of the corridor, a major opportunity has been excluded from the discussion. We ask that reference to the Grey Cloud Study Area be added to the text.

9

Also, we would offer that Grey Cloud, if developed as a regional park, would be a much more suitable location for the interpretive center on the south end of the corridor.

On page 30 the plan states "On the left-descending side of the river there are currently no local government plans to provide a trail along or near the river." While that is true, the County is currently revising its comprehensive plan which includes a master plan for linear trails. This plan should be completed by December 1994 and may include trail segments in the corridor.

8. The plan was revised to state that seeking grant funds is a high priority.

9. The draft plan did include maps showing Lower Grey Cloud Island for park status as proposed in local plans for land acquisition. However, the Open Space and Trails section was revised to also identify Grey Cloud Island as an example of a large parcel in the lower river that has been proposed by local government for park land that would potentially be eligible for the NPS grant program.

COMMENTS

Transportation

10 The plan is also unclear about whether or not new or expanded bridge crossings and associated approaches would be allowed in the river corridor. Prevent new and expanded bridge crossings would have a significant adverse affect on local businesses. The plan does not address this issue. New bridges or expansions of existing bridges should be allowed if they are consistent with local and regional land use plans and policies.

The County will be addressing three bridge issues in its 1994 Comprehensive Plan:

1. I-494 bridge improvements in Newport.
2. Need for an additional bridge between I-494 and TH 61.
3. Role of the CSAH 22 toll bridge.

11 A major portion of the Mississippi River in Washington County has rail line abutting or near the shoreline. It is a major oversite that no mention of rail transportation or its economic impact is made in the plan.

CONCLUSION

While not reaching a supportable plan yet, we do commend the National Park Service for beginning the development of a management framework based upon the concept of partnerships. Allowing local governments, i.e. counties, cities and townships, to implement the MNRRA plan is an appropriate strategy. Strong leadership and active participation by an oversight agency may be needed. The Metropolitan Council, an existing entity that has been given the authority to provide regional oversight, could play that role. The plan should be specific as to what that oversite entails. We encourage the National Park Service to pursue its goals through existing governmental entities, not by creating an additional layer of bureaucracy. We would encourage a variance procedure with a good dispute resolution process (possible through the DNR).

We strongly support the concerns of the communities and businesses in the county that fall within the river corridor. We encourage you to take their concerns seriously and to work with them to resolve those concerns before you approve the plan.

Thank you for the opportunity to comment on the plan.

RESPONSES

10. The policy was clarified (see responses to comments G-15-12 and G-15-16).

11. A reference to rail transportation was added, but detailed analysis is beyond the scope of the plan.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

Ms. JoAnn M. Kyral, Superintendent
Mississippi National River and Recreation Area
175 East Fifth Street
Suite 418
Box 41
Saint Paul, Minnesota 55101

Dear Ms. Kryal:

In accordance with Section 309 of the Clean Air Act and the National Environmental Policy Act, the United States Environmental Protection Agency has reviewed the Draft Comprehensive Management Plan Environmental Impact Statement (DEIS) for the Mississippi River and Recreation Area, Minnesota. The purpose of the DEIS is to assist in the fulfillment of the three goals of the Mississippi National River and Recreation Area (MNRRA). These goals are to 1.) protect, preserve, and enhance the significant values of the Mississippi River corridor through the Twin Cities metropolitan area, 2.) encourage coordination with federal, state, and local programs, and 3.) to provide a framework to assist the state of Minnesota, and local government in the development and implementation of resource management programs.

The DEIS discussed and evaluated four alternatives. The no action (alternative A) would consist of the continuation of land use trends, no new policy or management actions for river related uses, no National Park Service facilities, and no monitoring programs. Alternative B would emphasize more resource preservation, protection, control river related uses, have significant NPS land ownership, management actions, and NPS/local partnerships. Alternative C would emphasize tourism, development, encourage river use development, no NPS facilities or additional lands, and local council responsible for all monitoring services. The Proposed alternative would emphasize balance between use and preservation/protection of river related uses, monitoring plans, minimal NPS lands, additional local park lands, and extensive partnerships.

The DEIS proposal to have a recycling program at the various facilities through out the MNRRA is encouraging. We offer the following recommendations to further promote pollution prevention in the MNRRA. These recommendations are in accordance with our agnecy's pollution prevention policy.

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COMMENTS

1 The NPS should consider the energy and water conservation measures in the construction of the various support structures. In terms of energy conservation, such measures could include the installation of sky lights, energy efficient electrical fixtures, automatic light timers, occupancy sensors, and smart windows. Water conservation devices consist of toilet dams, low volume or waterless toilets, and faucet aerators. We also recommend that

2 wood for projects be obtained from forest suppliers that practice sustainable silviculture. If possible, we also recommend that local governments consider changing municipal codes to promote such pracitices to be used in new construction and renovation projects.

Based on our review, we have rated the DEIS an LO. This rating indicates that we have a lack of objection regarding this project. This rating will be published in the Federal Register.

Thank you for the opportunity to review the DEIS for the MNRRA. If you have any questions or comments, please contact Al Fenedick of my staff at 312/886-6872.

Sincerely yours,

William D. Franz

William D. Franz, Acting Branch Chief
Planning and Assessment Branch
Planning and Management Division

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RESPONSES

1. The NPS interpretive centers would be developed using the latest concepts in sustainable design. This would be complicated at the Washburn/Crosby complex, because it is in a historic structure. These ideas are further emphasized in the plan in the Proposed Development section in the discussion of the Harriet Island and St. Anthony Falls facilities.

2. The suggested policy was added.

Progress Through Partnership

MCDA

Jay Jensen
Executive Director

October 8, 1993

Ms. JoAnn Kyral, Superintendent
National Park Service
Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418
St. Paul, Minnesota 55101

Dear Ms. Kyral:

Thank you for the opportunity to review the Mississippi National River and Recreation Area Draft Comprehensive Management Plan and for allowing an additional 30 days to make comments. This letter represents the comments of both the City of Minneapolis and the MCDA Board of Commissioners and supplants the MCDA staff comments submitted earlier.

In general, we feel that the draft plan is significantly improved and addresses many of the comments which had been raised in relation to earlier documents. We thoroughly agree with much of the plan, including the purpose and vision statements and proposed interpretive themes.

The MCDA and City of Minneapolis have seven major areas of comments, questions, and concerns: 1) the definition of "balance," 2) the location policies, 3) the site development policies, especially the setback and height restrictions, 4) the implementation process, 5) the variance policy, 6) the size of the interpretive center at St. Anthony Falls, and 7) funding for plan implementation. We also have a number of smaller questions, comments, and suggestions.

We do not intend to imply with any of our comments that we are not willing to support reasonable and appropriate restrictions to development, nor that we favor economic development over environmental concerns. We believe that responsible development can occur while still preserving our environment. We recognize the importance of the Mississippi River and want to preserve it as a treasure for future generations. We do ask, however, that the proposed restrictions be clear and practical and that they clearly achieve some generally accepted benefit. We ask that the restrictions recognize the Mississippi as a largely urban river which has generated substantial human activity and which has many different characters throughout its length. Finally, we recommend that the plan implementation process be clear and workable, so that it does not unnecessarily complicate the implementation of desirable activities.

Minneapolis Community Development Agency

Crown Roller Mill, Suite 200/105 5th Avenue South/Minneapolis, MN 55401-2534
General Information (612) 673-5095
Telecopier (612) 673-5100

Equal Housing and Employment Opportunity

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Balance

A great deal of discussion has centered around the use of the word "balance" n numerous places in the plan. We are comfortable with this word as defined in the plan glossary. "Balance" as defined this way would not necessarily mean an even sp it between the various types of resources. Rather, this definition of "balance" implies that a cost/benefit approach would be used in evaluating proposed activities. For example, if, after a thorough review of all of the costs and benefits, it is determined that a small economic cost would preserve a large and important natural benefit, a "balanced" approach would then give greater weight to the natural resource. Conversely, if it will cause a large financial hardship to preserve a minor natural resource, greater weight would be given to the economic resource. This balanced, cost/benefit approach to plan implementation is an important factor in our acceptance of the proposed plan.

In order for this balanced approach to be successfully implemented, all parties must be reasonably comfortable that the potential costs and benefits of an action can and will be taken into consideration. The assessment cannot rely only on those factors which can be easily quantified. An effort must be made to also identify and assess those factors *which may not be quantifiable, but which are nevertheless real, e.g., the economic* benefit of parks and a clean environment and the future costs of cleaning up pollution.

1 As part of the debate about the use of the word balance, various other words were suggested as alternatives. In many of the cases, we do not feel that a choice must be made, because often the alternate word is complementary, not inconsistent. For example, we should not need to choose between a "balanced plan" and an "integrated plan," when in reality we should be seeking a "balanced and integrated plan."

Location Policies & Land Uses

2 The primary objective in selecting which land uses are appropriate within the 300' riverfront area (Location policies, pp. 24-25) is unclear to us. The characteristics of a use should be more important than which land use use it is -- is it well-designed, is it an appropriate use for the area in question, is it non-polluting, does it allow for physical *and/or visual open space along the shoreline? For example, the MCDA has been* actively seeking development in various light industrial and/or research and development parks which are within the corridor. These uses can be as non-polluting and attractive as any "consistent" office, retail or residential development and are often planned for areas where the consistent uses would not, in fact, be appropriate.

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1. "Integrate" was added in most places where the term balance is used.

2. See responses to comments G-8-7 and G-10-1.

3 We also do not see why inconsistent uses should always be encouraged to move (Policy (2), p. 26) or to change if the owners move away (Policy (3), p. 26). If the uses are not causing a problem and if jobs and taxes would be lost as a result, it may be more productive to work with those uses to achieve the visions of the plan without displacement.

The language at the bottom of p. 25 allows for some exceptions to allow "inconsistent uses," but it is unclear who would grant these exceptions, how long it would take, and at what step in the process it would be decided (also see comments on the process and variance policy).

We have a number of sites which are located partially within the 300 foot riverfront area and partially outside that area. We recommend that the plan clarify that the proposed land use policies relate only to the actual structures related to a use, not to other facets of the use. For example, if a general industrial building is located on the portion of a site which is outside of the 300 feet, the parking related to that use could be located within the 300 feet.

Site Development Policies – Setbacks and Height Restrictions, Screening

4 The setbacks and height restrictions proposed on p. 27 are new with this draft and need substantial revision. First, the proposed setbacks and height restrictions are far too restrictive in an urban area such as Minneapolis. For example, many river-dependent uses must have structures closer than 100' from the river in order to function and the heights of those structures would often exceed the limits. Even townhomes or single family homes might easily exceed 25' at the top of a gabled roof. The proposed setbacks and height limits are out of character with a densely developed area and will substantially reduce the development potential of a number of sites, without any clear benefit being achieved. While we do not oppose the general concept of setbacks and height limits, we feel they should be tailored to fit the character of each particular portion of the River. For example, activity nodes tend to occur where major bridges cross the River. These may be areas where larger-scale development would be more appropriate. Also, a development such as a marina may need a structure within 100 feet of the River, which should be allowed if public access to the River can be retained. The proposed setback would more than double the current critical area setback. Even assuming modest development densities, for every 100 feet of shoreline affected, there is the potential for losing 6,000 square feet of land which would have been available for development, employment for 2-3 people and over $5,000 in annual real estate taxes.

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3. This was clarified in the revised riverfront policy under land use and protection policies.

4. The final plan was revised to state that 100 feet is preferred, but this policy may be increased or reduced in areas where necessary due to the existing character of the riverfront. This determination would be made in locally revised critical area plans. The draft MNRRA plan did say that downtown areas would be visible from the river (p. 19). However, the final plan was revised to clearly state that downtown areas are excluded from the height limits recommended in the plan. The final text states that it is understood that height limits would be set by local governments in their critical area plans and ordinances, and they would be different in downtown areas.

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5 Secondly, there are many ambiguities relative to setbacks and heights. It is unclear where and how the allowed building heights will be measured -- will it be from the water level, the ground level at the riverbank, the ground level at the river side of the use in question, or the average ground level for the depth of the use in question? And will height be measured to the highest point on the structure or the average height of the structure? It is also unclear what constitutes a "bluff." Is it assumed that there is a "bluff" everywhere along both sides of the river, or are only certain land forms considered a "bluff?" Minneapolis has many areas where the grade is relatively flat and there is no apparent bluff, or where the natural bluff has long since been altered. The existing Minneapolis Critical Area Plan identifies certain areas which are considered "bluffs" and which thus are subject to restrictions. Will a similar approach continue into the implementation of the MNRRA plan? If the bluff is close to the shoreline, which setback prevails?

6 The first full paragraph on p. iv of the Summary notes that "Except in existing commercial and industrial developments, downtown areas, and historic districts, the riverfront and bluff area would appear mostly natural from the river and its shoreline areas (as observed from the opposite bank). In downtown areas and historic districts development would be more visible but still complement the aesthetics of the river corridor..." This language is inconsistent with some of the Site Development Policies on pp. 26 - 29, e.g., (1) and (15). The language from the Summary should be repeated in the Site Development Policies to reinforce the concept that certain types of areas will have a different character.

7 The last full paragraph on p. 164 implies that the setback is merely a matter of some additional costs, when in fact there probably will be instances where the setback and/or height limit actually make a site undevelopable for the use proposed. At some point the proposed restrictions might be considered a "taking" for which the property owner must be compensated. Finally, the map on p. 145 and the corresponding text on pp. 154-155 and pp. 164-165 underestimate the land area which will be affected by the location and site development policies. Certainly in Minneapolis there is a large amount of land along the River which is currently developed (and thus not included in the map or the area totals), but which we expect to see redeveloped within the life of the plan.

8 Given the vastly different natures of the various segments of the corridor, we see no reason why the same site development guidelines should apply everywhere. We recommend that the MNRRA plan deal only with the general goals to be achieved by the policies and that the setting of specific guidelines (such as setbacks and height restrictions) for various segments be handled as part of the updating of local plans.

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5. This would be subject to local definition and based on state guidelines in critical area programs. Metropolitan area practices would prevail and local ordinances would define specifics.

6. The text in later sections was clarified to make it consistent with this statement.

7. This was clarified. The final plan acknowledges that setbacks would be less in downtown areas. Downtowns are also excepted from the specified height limit guidelines in the plan.

8. The final plan stresses that the document provides a framework of visions, concepts, and policies to guide use and development in the corridor. Local governments can tailor their plans and ordinances to the local situation within this larger vision. Specific dimensions are provided to give the policies better definition. Many comments requested more specificity in the plan.

Process

The proposed process for plan implementation must be given much more consideration and clarification. In the development industry, time is money and a complicated, unclear, time-consuming, potentially controversial process can easily discourage desirable activities from being proposed, even if in the long run they may be approved. The first full paragraph on p. 76 downplays the potential impact of the proposed process. Depending on how the process actually is implemented, it could be as inoffensive as p. 76 implies, or it could be horrendously worse than the current situation.

The plan needs to be expanded and clarified to answer the following questions:

- Which types of proposals go to which bodies for review, e.g., how "major" must a proposal be before it must be reviewed by the Commission itself, and will DNR review all proposals within the corridor, only those within the 300' riverfront area, or only those within the 300' riverfront area which do not comply with the amended local plan? We recommend that the DNR review only those proposals which do not comply with the local plan or which require a variance, conditional use permit, or exception (which is the current Minneapolis procedure under our Critical Area Plan) and that the Commission review only projects which are large enough to require an Environmental Impact Statement or which require state or federal permits. 9
- What does "review" mean -- the ability to provide comments to be considered by the local authorities or the ability to veto?
- How quickly must the proposed reviews by the Commission, Metropolitan Council, and/or DNR be completed? Will the reviews be concurrent with the local reviews or subsequent?
- What does it mean that DNR will have "certification authority over local decisions?"

- At what point will the new guidelines be applied? In particular, if a project begins planning under the current guidelines, but the guidelines change in the midst of the project formulation and approval, which guidelines will be enforced? 10

- Will the model ordinances to be proposed by DNR be fairly specific, thus depriving the local governments of their decision-making authority, or will the model specify only the general format to be used? 11

- DNR obviously has significant expertise in dealing with natural resource issues. Will they have sufficient expertise in other areas, e.g., the impacts on economic or cultural resources, to adequately assess the relative weights of those costs and benefits to achieve the desired "balance?" 12

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9. See response to comment G-25-7.

"Review" means an opportunity to comment on actions or proposals before a decision is made. By deleting the proposal for state legislation to mandate consistency, the plan does not add any more authority than currently exists.

Reviews would use existing processes and be concurrent to the maximum extent practical.

Under the revised plan, the Department of Natural Resources would have no more authority than currently available under state law. The critical area program would be transferred from the Environmental Quality Board to the Department of Natural Resources to increase coordination between the shorelands program and critical area program and facilitate implementation of the MNRRA plan.

10. The policies would be applied after the plan is approved. They should not change frequently. Corridor communities might tailor the policies in their revised critical area plans and ordinances, but they can also determine the effect of this tailoring on specific projects.

11. It should be somewhat specific to provide adequate guidance, but it would not be mandatory. The model ordinance would be provided as an example of plan consistency. Communities could tailor it to the conditions in their section of the corridor.

12. They would build on existing capabilities, and the Metropolitan Council would be a partner in the planning process.

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13 In addressing these questions, we recommend that the plan err on the side of keeping the review process as locally-based, timely, simple, and clear-cut as possible.

The plan proposes a variance policy which would be used for specific developments which do not comply with the plan, and the first full paragraph on p. 24 refers to the ability of local communities to "tailor policies to the specific resources in their section of the river." We recommend that the application of these two concepts be coordinated and carried into the section on the roles of the partners in implementation. In particular, we recommend that the plan provide that the local plan amendments which are to be proposed by local communities may include provisions that are generally consistent with the MNRRA plan's visions, but which are not in strict compliance with specific policies of the plan, including the reasoning therefor. These inconsistencies would be considered by the Metropolitan Council in reviewing the proposed plan amendment and, if the reasoning is persuasive, would become part of the approved local plan. The local government and DNR would then be reviewing specific proposals for compliance with the local plan, not with the MNRRA comprehensive plan. Specific developments which comply with the approved local plan would not require a variance. This would reduce the need for variances, would expedite the process for individual developments, and would allow local governments to comprehensively tailor the local plan to fit the particular circumstances, rather than waiting for individual variances. If such a process step is included, the criteria for reviewing the local plan amendments must be established.

14

This recommendation could be achieved by making the following text changes (additions are shown in underline):

P. 77 - **The Metropolitan Council**, seventh line:

"governments. In preparing draft local plan amendments, communities may propose policies and provisions that are generally consistent with the MNRRA plan, but which tailor the plan to fit the specific resources in their section of the river and which thus may not be in strict compliance with specific policies of the plan. The local community must state the reasoning for the proposed local policies. These inconsistent policies and provisions would be considered by the Metropolitan Council in reviewing the proposed local plan amendment and, if it is determined that the plan's visions are achieved and resources are protected in a balanced manner, the provisions would become part of the approved local plan. In reviewing draft plan amendments..."

15

13. Text was added to clarify the review process and emphasize these concepts.

14. Once the local plan was determined to be substantially in conformance, it would take precedence.

15. This comment was incorporated.

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16

P. 78 - **The Department of Natural Resources**, second through fourth bullets:

- review development proposals within the riverfront area ~~for~~ which are not in conformance to the local plan amendment or which require a variance, exception or conditional use permit
- monitor overall progress toward plan implementation
- review variances for conformance to the local plan amendment"

The MNRRA legislation states that the plan shall include a "program for the coordination and consolidation, to the extent feasible, of permits that may be required by Federal, State, and local agencies having jurisdiction over land and waters within the Area." The draft plan proposes a process (pp. 79-83) for achieving this goal, but not the end result.

17

The plan should include more substantive recommendations on how the permit process is proposed to be revised in order to "coordinate and consolidate." At minimum, we recommend that the plan describe how the proposed plan implementation process will be integrated with the existing permit process and/or the consolidated, coordinated process. It is difficult for us to assess the viability of the total process without this comprehensive discussion. The goal in integrating these processes should be to have the various reviews proceed concurrently, not sequentially, so that the total process can be accomplished in no more time than is currently required.

Variance Policy

18

We are glad to see the inclusion of a proposed variance policy, but are concerned that the proposed criteria are unclear in their interpretation and may, therefore, be applied in ways which are too restrictive. Also, if all variances are granted locally, but then must also be reviewed by DNR, the question of how long it takes for the review becomes a factor. We recommend that the concept of cost/benefit and balance be incorporated in this section. For example, a variance request may relate solely to economic considerations, but if the cost of complying with the plan is significant and the adverse impact would be minimal, the variance should not be denied solely because economics is the only factor at issue.

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16. Section 705 (d) of the MNRRA act does not appear to give the authority to limit DNR review (acting under contract with the National Park Service) this restrictively. There may be a threshold of projects in the corridor, such as some building permits, that could be excluded without violating the intent of Congress to have comprehensive monitoring of development actions in the corridor.

17. Some additional text was added to address this comment. The reviews would be concurrent.

18. The text was simplified to say that it would conform to state law and local ordinances. The criteria were deleted from the plan.

19 At minimum, we are recommending a change in the fourth bullet under the variance policy language on p. 29 to make it more consistent with current state law (proposed addition is underlined):

* The variance is not based solely on economic considerations if reasonable use for the land exists.

Interpretive Center at St. Anthony Falls

20 The proposed size of the interpretive center vastly underestimates the interpretive potential at this location. For example, the orientation center for the St. Anthony Falls Heritage Trail alone is anticipated to require 20,000 sq. ft. An additional 6,000 sq. ft. to tell the many stories related to this portion of the MNRRA corridor will not be sufficient. We feel that an NPS investment similar to that proposed for St. Paul is warranted. Minneapolis staff will continue to work with NPS staff to further refine a proposal for the St. Anthony Falls area. We hope that, in the meantime, the size and costs estimates in the plan will be considered guesstimates and not limits.

21 We also would like to clarify two items on the chart on p. 65. The "Potential lead agency" for the Minneapolis center may be the property owner in question (e.g., NSP), if a site other than the Washburn/Crosby is selected. We should also note that neither the City nor the MCDA have made any formal commitment to a particular role relative to the interpretive center, although we are certainly willing to consider a role. Finally, Minneapolis also has a tour boat as one of the "Nearby amenities."

Funding

22 The plan contains an extensive amount of detail when it comes to specifying what should and shouldn't be done by local authorities and private parties, yet it has only the most minimal amount of information on what it might cost to implement the plan and what the likelihood of funding for plan implementation is.

19. The subject list was deleted.

20. See response to comment G-29-5.

21. It is unlikely that Northern States Power would be the lead agency in rehabilitating the structure and operating the interpretive center, even if located at the Main Street Station. The plan allows for flexibility in designating another lead agency if an alternate site is chosen. However, with the preferred alternative being the Washburn/Crosby complex, the city or state historical society would be the most appropriate lead agency.

22. Implementation costs are very difficult to predict at this time. Additional work would be done to estimate local government land acquisition and development costs following plan approval. This would be used to estimate the potential funding needs for the authorized NPS grant program.

While the visions of the plan are highly desirable, the costs of achieving those visions will be substantial -- both in terms of direct expenditures by governmental authorities and private entities and in terms of indirect costs resulting from restrictions on development or from delays due to additional reviews. It is always dangerous to create expectations of what could happen without having a clear sense of how it can and will happen. Either the plan should further identify the costs of implementation so that the feasibility of funding those costs can be better assessed or the plan should specify what will be expected if the necessary funds are not available to implement the plan.

Other Questions and Comments

23 * The draft plan, particularly the proposed interpretive themes and the inventory of cultural resources, should be reviewed by representatives of the Native American community to assure that their community's perspective on, and connection to, the River is appropriately incorporated.

24 * P. 23, Policy (1) -- Why should significant resources always be acquired by local governments if there are situations where another responsible party is willing and able to protect that resource?

25 * P. 27 -- Will the third bullet preclude trails and parkways within the 40' setback from the bluffline? This would be inconsistent with some of the Minneapolis Park and Recreation Board's current plans.

26 * Map, p. 31 -- The amount of open space in the central Minneapolis area seems under-represented. Also, there is a proposed trail between Cedar Lake and the River which is an important link and which should be shown. Why are the trails along the River through south Minneapolis shown as "proposed" rather than "existing?" How were the "trail needs" and "open space opportunities" determined?

27 P. 37, Policy (2) -- This policy restricts the locations of fleeting areas, but not marinas. Perhaps marinas should be prohibited near existing or potential fleeting areas.

* Pp. 39 - 41 -- The MCDA is very familiar with the costs of cleaning up pollution after it has occurred. We strongly support the policies to prevent pollution and to clean up polluted sites.

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23. Representatives of the Native American community were asked to review the document, including the interpretive themes.

24. The subject list was deleted.

25. No, it would not.

26. Some revisions to the map were made. The information is included in the MNRRA GIS database and additional corrections could be made if specific information is provided. Also, the maps are at a scale where not all small parcels are displayed.

27. This would be addressed in follow-up planning.

COMMENTS

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October 8, 1993
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28 • P. 42, Policy (1) -- What if the existing use in an historic structure is inconsistent with both the MNRRA plan and local plans?

29 • P. 49, fourth paragraph, and p. 144, fourth paragraph -- These paragraphs refer to industrial and warehouse use and commercial navigation below the I-694 bridge. These river crossing references should be changed to the Camden Bridge in Minneapolis, which is essentially the head of navigation and the related business development.

30 • The Minneapolis Community Development Agency is not listed as a participant in Appendix D, and the name of the agency should be corrected on p. 66.

31 • P. 86 -- The third paragraph should note that there also will be operational costs associated with the Minneapolis center, whether these are direct NPS costs or paid in the form of rent.

32 • Pp. 86 & 87 -- We hope that the 50% matching grants will not be limited to open space acquisition and land development, but will also be available for any costs associated with plan implementation, e.g., historic preservation, development of facilities such as marinas, pollution prevention and clean up, and the provision of incentives to encourage inconsistent uses to relocate.

33 • Pp. 128 - 131 -- The Stone Arch Bridge is a National Engineering Landmark and should be listed.

34 • Map, p. 147 -- The locations of "urban waterfronts" are somewhat hard to read, but are obviously much more limited in scope than the Glossary definition of "urban uses" would imply. We propose that in Minneapolis both sides of the River from the Camden Bridge to the I-94 Bridge be considered the "urban" area where a different character would be consistent.

35 • *The Environmental Impact Statement does not discuss any potential measures to mitigate the impacts of implementing the proposed plan.*

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RESPONSES

28. These situations would be addressed in community plans or on a case-by-case basis.

29. This was revised to say Camden Bridge.

30. This was corrected per the comment.

31. A statement was added to that effect.

32. According to the legislation, grants would not be limited to open space, but are limited to the acquisition and development of land or waters (or interests) in the corridor.

33. This was added to the St. Anthony Falls Historic District description.

34. This map is for general use only. Downtown areas within the corridor boundaries would be designated in community plans. Other areas (such as urban areas) might be designated in community plans but that is not necessary for compliance with the MNRRA plan.

35. Mitigation measures are included in the Proposed Plan, Alternatives, and Environmental Consequences sections as allowed under NPS environmental compliance guidelines.

We hope that our comments, questions, and suggestions will prove useful as you prepare the final draft of the plan. We are confident that these items can be addressed and that a final document can be produced that will set the framework for a program of development and activities that will enrich our use and appreciation of the River and enhance the quality and attraction of this area. Please contact Ann Calvert of the MCDA staff if you have any questions about any of our comments.

Sincerely,

Donald Fraser, Mayor
City of Minneapolis

Walter Dziedzic, Chair
MCDA Board of Commissioners

Sharon Sayles Belton, President
Minneapolis City Council

Jay Jensen, Executive Director
MCDA

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cc: Minneapolis City Council Members

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CITY OF BROOKLYN PARK
Office of the City Manager
5600 85th Ave. No., Brooklyn Park, MN 55443-4300 ■ Phone 612 424-8000 ■ Fax 612 493-8591 TDD 612 425-8592

Craig R. Rapp
City Manager

September 13, 1993

Ms. JoAnn Kyral, Superintendent
National Park Service - Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418
Box 41
St Paul MN 55101

RE: Comments on review of Mississippi National River and Recreation Area (MNRRA) Draft Comprehensive Plan/Draft Environmental Impact Statement

Dear Ms. Kyral:

Our City Council would like to thank you, Susan Overson and Barb Johnson for presenting the draft MNRRA Plan and answering questions at our September 7, 1993, City Council Committee-of-the-Whole meeting. At this meeting several different perspectives regarding the Plan were offered. Some Councilmembers expressed their support, in general, for a Federal Plan which will assist in enhancing and preserving the river corridor. However, other Councilmembers expressed opposition to the increased level of government approvals and involvement in local government actions. Regardless of the differing opinions, we want to make sure that the National Park Service (NPS) and the Mississippi River Coordinating Commission (MRCC) know what issues are important to our community. Those issues are as follows:

1. The importance of preserving the integrity of existing land uses which make up our portion of the MNRRA.

2. The Council desires no additional regulatory controls at the Regional, State or Federal level and wants to maintain all zoning and other land use controls at the local level.

3. The City Council generally supports the concept of a pedestrian and bicycle trail along West River Road but it was strongly stated that design considerations are of paramount importance.

Our memorandum of September 7, 1993, which we forwarded to you prior to the City Council meeting, asked for clarification on a number of items. Your presentation was very informative and

enabled us to better comprehend the intent of the Plan. After reviewing your input, we have come to the following understanding of the NPS's position on our questions:

1 1. There will be no view easements acquired in the Corridor.

2 2. The City of Brooklyn Park will be responsible for construction and maintenance of any pedestrian and bicycle trails built in our City. Matching grants may be available through the NPS or other state agencies to implement this portion of the Plan.

3 3. It was stated by the NPS that no additional regulatory authority is being proposed in the Plan that is not already in place through the Environmental Quality Board. As a result, the NPS will not be seeking jurisdiction over any land areas in the City of Brooklyn Park. It is our understanding that the NPS, working in conjunction with the DNR and Metropolitan Council, will be working with the City in the future to incorporate the Plan's proposed land use controls and design guidelines into our local ordinances so that control will remain at the local level.

4 4. The NPS acknowledges that while existing land uses are non-conforming and therefore have "grandfathered status", the provisions for new in-fill development will be flexible in nature due to the divergent area characteristics found through the 72 mile Corridor.

5 5. The MNRRA Plan does not define additional wetland, flood plain, wildlife habitat and historic district requirements that are to be incorporated into local ordinances. The NPS supports the use of local task forces to determine what those requirements should be.

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Finally, thank you for your presentation and the efforts you have made to solicit our community's input on the Plan. As a result of this information, the City will contact the Minnesota State Historic Preservation Office to invesitgate the process of designating West River Road as an historic roadway.

Sincerely,

Craig R. Rapp
City Manager

cc: City Council Members
Dennis Palm, Director of Parks and Recreation
Scott M. Clark, Planning Director

1. The National Park Service does not plan to acquire view easements, but local governments might.

2. This is correct.

3. This is correct per the final plan.

4. This is correct.

5. The plan does not require new regulations but does encourage better enforcement of existing regulations and updating of some land use codes to conform to the MNRRA plan.

City of
INVER GROVE HEIGHTS

8150 BARBARA AVENUE • INVER GROVE HEIGHTS, MN 55077 • TELEPHONE [redacted]
(612) 450-2500

September 29, 1993

JoAnne Kyral, Superintendent
Mississippi National River and Recreation Area
175 E. 5th St., Suite 418, Box 41
St. Paul, MN 55101

Dear Ms. Kyral:

Enclosed is a copy of Resolution No. 5858, which was unanimously adopted by the Inver Grove Heights City Council, on Monday, September 27, 1993. The Resolution outlines the Inver Grove Heights City Council position regarding the draft Comprehensive Management Plan and Environmental Impact Statement for the Mississippi National River and Recreation area.

1 The City Council's major concern centers around local government control. It is the position of the City of Inver Grove Heights that greater control should continue to be placed at the local level rather than at the Metropolitan County, State or Federal levels.

On behalf of the City Council, I want to thank you for providing our City an opportunity to respond to the final draft document, as well as for your attendance at the City Planning Commission on August 17th.

Should you have any questions regarding the Inver Grove Heights position, contact myself directly at 450-2587.

Sincerely,

Bruce K. Anderson, Director
Parks and Recreation

cc: Inver Grove Heights City Council
James G. Willis, City Administrator
MNRRA Task Force Members
Tom Link, Director Planning

BKA:nv

1. The plan was revised to further stress local control.

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STATE OF MINNESOTA
DAKOTA COUNTY, MINNESOTA
RESOLUTION OUTLINING THE INVER GROVE HEIGHTS CITY COUNCIL POSITION REGARDING THE DRAFT COMPREHENSIVE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT FOR THE MISSISSIPPI NATIONAL RIVER AND RECREATION AREA

Resolution No. 5858

WHEREAS, on November 18, 1988, Public Law 100-696 established the Mississippi National River and Recreation Area as a unit of the National Park System, and

WHEREAS, the Mississippi National River and Recreation area includes 72 miles of the Mississippi River and 4 miles of the Minnesota River encompassing 54,000 acres of public and private land in water in five counties stretching from Dayton to just south of Hastings, and

WHEREAS, the Inver Grove Heights City Council formally established the Mississippi River Task Force, and

WHEREAS, the City Planning Commission scheduled a formal presentation by the Executive Director of MNRRA, and

WHEREAS, MNRRA will be accepting open comments until October 11, 1993.

NOW, THEREFORE, BE IT RESOLVED THAT THE INVER GROVE HEIGHTS CITY COUNCIL, hereby submits the following comments and critique of the proposed draft plan for National Park Service consideration:

2 1. Greater emphasis should be placed on increasing pollution reduction efforts.

3 2. A freeze should be placed on additional barge moorings within the City of Inver Grove Heights, until additional research on the impacts and alternatives were evaluated.

4 3. Monetary sources should be defined and identified for the open space development and acquisition projects as outlined in the plan.

2. The plan places a greater emphasis on pollution reduction efforts for the corridor using existing state and federal authorities and regulatory standards and pollution prevention programs.

3. It is the understanding of NPS staff that cities have the authority to place a freeze on barge fleeting sites within city limits. It would be inappropriate in this plan for the MNRRA corridor to single out one community for a freeze on new fleeting sites. The plan states that local governments would continue to designate suitable fleeting sites in their corridor plans. The final comprehensive management plan was revised to clearly state that local governments can regulate the establishment of new fleeting sites through their land use control powers. The final plan also calls for a surface water use management plan that would identify existing and potential future fleeting sites. Local governments would be invited to participate in this planning effort.

4. The plan indicates that congressional funding would be sought for the grant program. This was further clarified in the final document.

5	4. Local government should continue to have jurisdiction and control over the riverfront within each of their respective communities.
6	5. The Metropolitan Council should not be granted additional legislative authority to review local plans regarding riverfront development.
7	6. Greater clarification needs to be made regarding definitions of regulated areas, particularly as they relate to bluff lines.

NOW, THEREFORE, BE IT RESOLVED, that staff will be directed to forward a copy of this Resolution to JoAnne Kyral, Executive Director, MNRRA.

AYES: 4

NAYS: 0

Joseph Atkins, Mayor

ATTEST:

Loretta Garrity, Deputy Sheriff

5. Local governments would have jurisdiction and control as further clarified in final plan.

6. The proposal for state legislation was dropped from the plan. Metropolitan Council reviews would occur under existing authorities with the review of corridor plans for consistency with the MNRRA plan provided under contract with the National Park Service.

7. The Metropolitan Council and Department of Natural Resources would provide more guidance in follow-up work.

Nininger Township

Office of Town Clerk

Superintendent JoAnn Kyral
National Park Service
Mississippi National River and Recreation Area
175 E. Fifth St. Suite 418 Box 41
St.Paul Mn. 55101-2901

Dear Superintendent Kyral:

Nininger Township would like to commend the efforts of the National Park Service and the commission members, in their attempts to develop a proposed plan for the MNRRA corridor. The township has only briefly reviewed portions of the proposed plan and would like to submit the following comments for consideration:

A. The township is pleased that multiple plans were available for choice, however, there is insufficient information covering plans A,B, and C to support a conclusion.

1 B. The plan pre-empts decisions normally made by the township board of supervisors and requires that local plans be modified to conform to the proposed plan. Many areas of the proposal are vague, making it difficult to determine what are its goals and objectives. Because of the many vague areas throughout the plan it is difficult to determine various agency responsibilities and it appears that the NPS is attempting to usurp all control from the local elected officials, who are held accountable by the people they represent. The township recommends that the proposed plan clearly define goals and objectives and that control and responsibility for township matters remain with local elected representatives of the people.

2 C. For the township to accurately assess the total impact of the proposed plan, it is imperative that a thorough environmental impact study be completed to consider the existing status, what needs to be done and to permit the establishment of a workable time table ot complete the goals and objectives of a well defined plan, Having this information available will permit the township to properly prepare and assist in the appropriate management of the river area.

3 D. The proposed plan lacks a comprehensive economic impact study. The only economics discussed in the plan dealt with NPS salaries and the cost of the interpretive center to be located on Harriet Island, at what appears to be an unrealistic cost of $427.74/sq. ft. A comprehensive economic study should do the following:

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1. The final plan reemphasizes local control and was changed to emphasize an incentives approach.

2. This analysis is included to the extent possible within the scope of the plan and its environmental impact statement.

3. An economic impact analysis was developed by a University of Minnesota professor and the NPS planning team and is incorporated in the environmental impact statement. This analysis concludes that there would not be significant economic impacts on the region. Some changes in the plan were made to address specific economic impact concerns.

Nininger Township

Office of Town Clerk

A. Determine the costs to implement the plan
B. Determine the costs to accomplish the goals and objectives of the plan
C. Determine what the costs will be to the local communities
D. Determine what the costs will be to business and industies to comply to the changes outlined in the plan.

E. The goals and objetives of the proposed plan are based on the availability of millions of federal and local dollars. The tight economic conditions indicate monies may not be available in the near future to carry out the proposed plan.

4 The plan does not address what happens when monies are not available. Are the local communities, business and industries expected to place everything on hold until monies become available? This should be addressed in the plan.

F. The proposed plan mentions a "Resource Management Plan" to be developed at a later date after approval of the proposed plan. The proposed plan on page 240 defines resources as

5 historical, recreational, scenic, cultural, natural, economic and scientific. This ocvers every aspect on the MNRRA corridor and as outlined in the plan would be managed by NPS. How the resources of the area will be managed by NPS should specifically be dealt with in the plan prior to approval.

6 The township representatives want to be able to define their role in local control where federal authorities desire to take over private lands. Land owners will also need input into those decisions and when necessary be assured of proper compensation without the necessity of a lengthy legal process.

Finally, we want you to understand that it has been and continues to be a goal and objective of this local government to maintain a strong commitment to the presentation of this valuable natural resource.

Thankyou for the opportunity to comment on the plan. The township appreciates the serious consideration that we expect will be given to the comments submitted.

Respectfully,

Nininger Township Board Members

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4. The plan would be implemented to the extent possible within fiscal constraints. The plan does not propose moratoriums.

5. The final plan reemphasizes partnership management. No resources in the corridor would be directly managed by the National Park Service.

6. Local control would be retained. NPS land acquisition would be minimal. Additional local park land would be encouraged though a grant program. The National Park Service would encourage communities to regulate lands within their authority. Regulations would not be so extreme as to require compensation.

COMMENTS

9301 Grey Cloud Island Drive
St. Paul Park, MN 55071

September 27, 1993

JoAnn Kyral, Superintendent
US Department of the Interior
National Park Service
175 Fifth Street East, Suite 418, Box 41
St. Paul, MN 55101-2901

Dear Ms. Kyral:

Thank you for attending our board meeting at our township. I wish to advise you of my personal desire and the desire of most of the citizens of the township that I've been in contact with that you stick with alternate A - no action as: 1) we do not feel that another layer of government is needed beyond the existing met-council. We feel they've done an excellent job of coordinating anything that needs to be done involving land use along the river; 2) we feel that we have been excellent stewards of the land and that there will be less impact to the envirnment and the wildlife if it remains as is under our current programs than if yours are implemented involving trails and interpretative centers, etc. - we feel these have negative impact, not a positive impact on the corridor; and lastly, 3) we don't feel that it's advisable under the current tight economic time to consider spending any more tax payers dollars for any additional projects - it's difficult to fund those already in use - some should be disbanded and those tax dollars applied to the deficit.

1
2
3

Dennis L. Hanna
Town Board Chair
Grey Cloud Island Township

DH/cp

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RESPONSES

1. No new layer would be added. Existing review systems would be used to the maximum extent practical.

2. The MNRRA plan would reward programs that show good stewardship through, among other things, the grant program.

3. Federal funds would be sought to implement several portions of the MNRRA plan, but they may not be provided during tight economic times. Other sources, such as donations, might be needed, or implementation may be deferred.

A RESOLUTION BY GREY CLOUD ISLAND TOWNSHIP, MINNESOTA IN OPPOSITION TO THE DRAFT OF THE PROPOSED COMPREHENSIVE MANAGEMENT PLAN ENVIRONMENTAL IMPACT STATEMENT FOR THE MISSISSIPPI NATIONAL RIVER AND RECREATION AREA

WHEREAS, Grey Cloud Island Township, Washington County, Minnesota, by and through its Town Board, in response to the request for comments to the proposed Comprehensive Management Plan and Environmental Impact Statement of the Mississippi National River and Recreational Area, Minnesota, does hereby adopt this resolution as its formal response and finds:

Grey Cloud Island Township, Minnesota, (hereinafter "Township") is an incorporated township in continuous existence at its current location on the Mississippi River for over 100 years.

Located within the Twin City metropolitan area of Minnesota, the Township is a unique community of fewer than 500 residents with a unique variety of urban and rural housing and lifestyles.

The presence of the Mississippi River bordering the Township is, from the perspective of the Township, a precious resource critical to the quality of life of its citizens.

The Township has a very long history and a well-developed historical sense of itself and the need to preserve its character as a unique rural-type township in the interests of its citizens.

The Township has gone through great lengths through the years by way of its zoning laws and ordinances to preserve the unique character of its residential and rural neighborhoods located immediately along the Mississippi River.

The experience of the Township over the years has been that outside agencies have generally been willing to overlook the community needs of a small township like Grey Cloud Island and have been prepared to advance the interests of commercial enterprises and groups wishing to use the waterway in a manner detrimental to the Township.

The Township, through its Town Board and Planning Commission, have been very carefully scrutinizing both the legislation creating (and implementation of) the Mississippi National River and Recreation Area.

In particular, when Representative Vento first proposed the legislation, the Township studied the proposed legislation and its possible impact on the Township.

At that time, The Township raised a number of concerns regarding the underlying proposed legislation that would have permitted the managing authority to supersede zoning of municipalities on the river, and potentially and effectively negating a century of efforts by the Township to preserve its riverfront character.

Notwithstanding the express language of the underlying implementing legislation, Township officials were assured that it was not intended to create a "super-agency" that could adopt its own zoning code and force its provisions upon municipalities and citizens living on the river and would not weaken municipal zoning code protections currently in place.

When, therefore, the Township was given the opportunity to review the draft of the Comprehensive Management Plan Environmental Impact Statement provided and make comment regarding the same, with shock and anger the Town Board *determined that very little protection is afforded to cities and townships* when they choose through zoning codes, to provide for provisions unique to its riverfront area if those provisions in any way conflicted with the overall plan.

Moreover, to add insult to injury, a review of the plan shows that expenditures in implementing the plan's provisions, including land purchase provisions, are to be made by municipalities and not by any federal authority or other state authority.

In particular, the Township notes that an apparent bikeway or pathway through the Township. The mere provision of such a bikeway on private land creates an immediate potential for inverse condemnation litigation and, given the provisions of the law and proposed plan, the full responsibility for any diminution of property value as a result of the implementation of the overall plan would be borne by the participating municipality.

No municipality can afford to acquiesce to the imposition of any requirement that it purchase corridors within its boundaries.

Moreover, the provisions of the plan clearly provide for implementation of an overall zoning plan by the Metropolitan Council and other authorities and does not permit a municipality with unique needs to override any such plan with, if necessary, more stringent provisions to protect the unique qualities of the community on the river.

Indeed, the plan requires consideration of commercial interests in utilization of the river corridor, but nowhere indicates that residential or rural usage is in any way different from or superior to any such other "interests" on the riverway. The Township takes the strongest possible exception to what it views as a fundamentally flawed failure of both policy and perception in the plan.

While the Township is aware that the plan purports not to affect the use and

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Metropolitan Council and DNR zoning regulations concerning the plan upon the Township and the plan expressly states an intention to provide for state legislation that would force municipalities within the corridor to conform their zoning codes to the plan, potentially in a manner adverse to the interest of the Township and its citizens.

The provisions in the plan that would require cities not to permit reconstruction of residences or structures other than on an existing footprint would be an additional restriction on the use of the land located on the riverfront that would have an immediate negative impact on property values facing the river and would once again, expose the Township to potential inverse condemnation liability.

Careful, thorough review of the proposed plan clearly indicates that its adoption would have a significant, negative impact on the Township and its ability to protect both that character developed through its history, as well as the interests of its citizens living on or near the Mississippi River.

Upon very careful review and thorough analysis, the Township is not merely opposed, but strongly opposed to the implementation of the plan and believes that any effort in defense of the plan to portray it as being a tool to assist the Township in its efforts to maintain its character and interests of its citizens is inaccurate, false and a sham.

NOW, THEREFORE, BE IT RESOLVED, that Grey Cloud Island Township, Minnesota, through its Town Board, acting on the 18th day of October, 1993, states in the strongest possible terms its opposition to the draft Comprehensive Management Plan Environment Impact Statement presented to it by the Mississippi Coordinating Commission and National Park Service.

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4

BE IT FURTHER RESOLVED that Grey Cloud Island Township, acting through its Town Board, does further state and resolve that it will remain in opposition to any purported plan for the Mississippi River corridor that does not allow the City full discretion through its zoning code to protect the rights and interests of its residential neighborhoods and citizens living on or near the Mississippi River (which, in the case of the Township is virtually all of its residents).

BE IT FURTHER RESOLVED that the Town Clerk is directed to forward this resolution to all appropriate authorities involved with the review of this plan, as well as any and all other

4. Local governments will continue to control zoning decisions.

affected municipalities and elected officials.

Adopted this 18th day of October, 1993.

GREY CLOUD ISLAND TOWNSHIP

By _____
Dennis Hanna, Town Board Chair

(ATTEST)

By _____
Richard Mullen, Town Clerk

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Minnesota Department of Agriculture

October 8, 1993

Ms. Joann Kyral, Superintendent
National Park Service
Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418
P.O. Box 41
Saint Paul, MN 55101

HAND-DELIVERED

Dear Superintendent Kyral:

The draft Comprehensive Management Plan and Environmental Impact Statement (EIS) for the Mississippi National River and Recreation Area (MNRRA) has been reviewed by Minnesota Department of Agriculture (MDA) staff. This is our first opportunity to comment because we have not previously been included as a part of the Plan's review process. We are surprised by this omission given the vital importance of the Mississippi River to agriculture.

First, please be advised the Minnesota Department of Agriculture strongly supports protecting the environment within the MNRRA corridor.

1 However, we agree with the Minnesota Department of Transportation that it is critical that the Comprehensive Management Plan not only preserve and enhance natural and recreational resources within the river corridor, but that it is also necessary to keep the river as a vital corridor of commerce because its use ensures the economic vitality of the Twin Cities, the state of Minnesota, and the Upper Midwest.

Minnesota agriculture is our state's main industry. In 1992, farm receipts totalled more than $7 Billion. Furthermore, more than half of Minnesota's exports are farm and food products worth more than $2.14 Billion.

2 The barge industry on the Mississippi is one of the main transportation modes for our agricultural production. Barges are an efficient and cost-effective way to transport much of our region's corn, syobeans, wheat, oats, and barley production to markets in other parts of the nation and the world. Without this vital transportation mode, Minnesota's agricultural economy would be severely harmed because other transportation methods are more expensive and less efficient.

The Mississippi is also a vital shipping corridor for agricultural pesticides, herbicides and fertilizer. These products are manufactured to a large degree in Louisiana and Texas. Given the very large volume of these products required by Minnesota agriculture, Mississippi river shipping is the most cost-effective means for shipping the products to Minnesota.

• Commissioner's Office • 90 West Plato Boulevard • St. Paul, Minnesota 55107-2094 • (612) 297-3219 • Fax (612) 297-5522

An equal opportunity employer

1. The importance of the corridor for economic uses was further stressed in the General Concept, Commercial Navigation, and Economic Resource Management sections of the final plan.

2. The final comprehensive management plan/environmental impact statement recognizes this and includes a description (which was provided by the Minnesota Department of Agriculture) on the importance of the river to agriculture and Minnesota's economy.

The Minnesota Department of Agriculture specifically joins the recommendation made by the Minnesota Department of Transportation in its August 19, 1993 letter to revise pages 34 to 38 of the draft Plan. This recommended language more accurately describes the commercial navigation occurring on the Mississippi.

3 Furthermore, we request the final Plan include a detailed study of the substantial economic benefits we obtain from the Mississippi River through its use as a major transportation corridor. We do not see an analysis of this sort in the draft Plan. Certainly, such analysis is necessary. Of course, we would be happy to participate in this analysis.

4 The Minnesota Department of Agriculture is also concerned with how the National Park Service intends to implement the final Plan. The Department is concerned that adoption of the Plan as currently drafted will be interpreted as a mandate for the National Park Service to expand its regulation beyond the nation's national parks. Please be advised the Minnesota Department of Agriculture supports local administration of any land use regulations adopted pursuant to the Plan. The Department also supports local and state administration of any environmental regulations.

Once again, the Minnesota Department of Agriculture agrees with the need to protect the environment of the Mississippi River. However, we also believe strong consideration must be given to the vital role of the river in the economy of the Twin Cities, the state of Minnesota, and the Upper Midwest.

I would appreciate your adding us to the mailing list for any correspondence from the National Park Service on the draft Plan. Our Department contact will be Assistant Commissioner William L. Oemichen. His telephone number is (612) 296-8170.

Thank you very much for providing us with the opportunity to comment on the draft Plan.

Sincerely,

Elton R. Redalen

Elton R. Redalen
Commissioner

cc: Assistant Commissioner William L. Oemichen

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3. The economic benefits of commercial navigation are more thoroughly recognized and described in the final document. Additional analysis would be done in follow-up work, probably by other partners in the MNRRA project.

4. The final plan emphasizes local administration and the use of incentives.

METROPOLITAN AIRPORTS COMMISSION
Minneapolis-Saint Paul International Airport
6040 - 28th Avenue South • Minneapolis, MN 55450-2799
Phone (612) 726-8100 • Fax (612) 726-5296

October 8, 1993

Mr. R. Michael Madell
Chief, Division of Planning & Resource Management
United States Department of the Interior
National Park Service
Mississippi National River and Recreation Area
175 Fifth Street East, Suite 418, Box 41
St. Paul, MN 55101-2901

RE: Draft Comprehensive Management Plan/Draft E.I.S.
Mississippi National River and Recreation Area (MNRRA)

Dear Mr. Madell:

Thank you for providing the Metropolitan Airports Commission (MAC) with the opportunity to comment on the Draft Comprehensive Management Plan/Draft Environmental Impact Statement (EIS) for the Mississippi National River and Recreation Area (MNRRA).

As you may know, MAC owns and operates two airports in the Twin Cities Metropolitan Area that are affected by the draft plan and alternatives -- Minneapolis-St. Paul International Airport (MSP), and St. Paul Downtown Airport. Also, MAC is conducting the legislature-mandated Dual Track Airport Planning Process, which will develop major airport alternatives to accommodate the long-term air transportation needs of the Twin Cities region. Specifically, this Dual Track Process is comparing and contrasting the impacts of an expansion to existing MSP, versus the construction of a new replacement airport in eastern Dakota County. In either case, minimizing environmental impacts will be a major concern of MAC.

In 1992, MAC adopted the master plan for St. Paul Downtown Airport, which includes additional approaches, sophisticated lighting, and expansion of the building area. A copy of the proposed development is enclosed.

MAC recently completed a Draft Alternative Environmental Document (AED) for the New Airport Site Selection Study (copy enclosed) of the Dual Track Airport Planning Process. In this document, MAC has identified environmental impacts associated with the alternative sites considered, including impacts on the adjacent Mississippi River corridor.

The Metropolitan Airports Commission is an affirmative action employer.

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1 However, in reviewing the MNRRA Draft Comprehensive Management Plan and EIS, impacts to MAC airports and a new major airport site are not identified. This is despite the fact that all of the St. Paul Downtown Airport and a portion of existing MSP lie within the corridor boundary. Specifically, a portion of the approach to MSP Runway 29L extends across T.H. 5 and beyond the Minnesota River into Dakota County. This runway area, which is MSP property, encompasses a sophisticated landing light system for approaching aircraft. According to the MNRRA plan, this MSP property lies within the four-mile stretch of the Minnesota Riverfront which will be incorporated into the MNRRA corridor.

Similarly, the proposed site for the new airport lies in Dakota County a few miles south and west of the corridor -- which may create impacts to the MNRRA project. Nevertheless, no mention is made of airport-related issues which might be impacted at either site should the MNRRA proposed plan, or any of the alternatives also described, be ratified.

MAC is concerned that these existing and potential airports are not identified as part of the MNRRA's "Affected Environment." There are several issues concerning the MNRRA proposed plan and alternatives which could impact the operation and safety of air travel over the MNRRA corridor at each of these existing and potential airports, including the following:

2 • *Bird Strikes* - MAC is concerned with the implications of increased habitat for birds in the areas near runways. Increases in bird habitat may increase the probability of bird strikes along aircraft approach and departure paths. Therefore, the impacts of greater bird populations affecting air traffic safety should be addressed by the MNRRA Draft EIS. This includes the implications of nesting areas for bald eagle, peregrine falcon, and other threatened or endangered species, as well as all migratory water birds which inhabit the overflight areas.

3 • *Noise* - The MNRRA Draft proposes to "Improve [noise] standards, education, mitigation, and enforcement if they are determined inadequate." MAC is concerned with any proposed noise mitigation measures which might affect aircraft operations (such as, time of day restrictions, etc.).

4 • *Visual Impacts* - The MNRRA Draft EIS describes the Purpose and Visions for the area. One vision statement promotes, "Additional opportunities for recreational and educational experiences, including scenic enjoyment and quiet contemplation, are provided throughout the MNRRA corridor." MAC is concerned with potential conflicts between this MNRRA goal and aircraft overflights along the corridor.

5 • *Air Quality* - As with noise and visual impacts, the MNRRA Draft EIS should address the implications of the river corridor plans on the airport sites in terms of

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1. Other than NPS interpretive centers, site-specific issues were not addressed in the MNRRA plan. The final plan recognizes the important role of the transportation system (including airports) in the metropolitan economy. Transportation is necessary to preserve economic resources in the corridor.

2. This was added to the Environmental Consequences section in the FEIS.

3. This was addressed in the environmental impact statement. Noise would be assessed in follow-up work. The final plan does not propose any specific noise mitigation measures. The final plan proposes an evaluation of noise issues to improve standards, education, mitigation, and enforcement if they are determined inadequate.

4. Airports were identified as a traditional use in the plan. It is recognized that a portion of the corridor is in the flight path of existing and potential new airports. This might affect the biological resources and public enjoyment of the area, but research has not been completed to assess these effects. Also see response to G-49-3.

5. The plan is not site specific. See responses to comments G-49-3 and G-49-4.

the effects of potential air quality mitigation on aircraft operation.

6 • *Aircraft Landing System* - As stated previously, a sophisticated aircraft landing system, consisting of arrays of landing lights, extends from MSP out over the riverfront area of the Minnesota River and across into Dakota County. What impacts would the MNRRA have on this landing system, and would the proposed plan or any alternatives conflict with aircraft operations using the landing system?

7 • *Expansion Plans for St. Paul Downtown Airport* - The Draft EIS should address the impacts of the river corridor plans on the proposed expansion of the airport.

The Draft for the MNRRA describes a proposed comprehensive management plan that focuses on a balance of use and preservation needs. This is compared to three other alternatives: Alternative A, which describes no action; Alternative B, which emphasizes more resource preservation; and Alternate C, which emphasizes visitor use and development. In each case, the environmental consequences of each plan on the operations of the existing and new airports should be identified. In the Draft EIS, impacts to the economic environment are also identified. Therefore, the Draft EIS should also include an assessment of airport impacts in terms of:

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9 • Cost of Complying with Land Use and Environmental Protection Policies (Existing or Proposed)

• Lost Opportunities for Expansion Due to Land Acquisition for Parks and Open Space

10 Regarding the MAC strategies for the Dual Track Airport Planning Analysis, it is apparent that the MNRRA Alternative B would increase restrictions to development and would restrict the overflight capacity of air traffic above the river corridor, while Alternatives A and C would maintain or reduce existing resource management, respectively. Even under the proposed MNRRA comprehensive management plan, certain resource uses would be balanced and protected. However, in the current draft, it is difficult to gauge what effect the MNRRA plan would have on the operations of air traffic at the airport sites.

Therefore, while MAC recognizes its role as a steward to the environment, we likewise are concerned with the impacts that the MNRRA would have on the operation and safety of the existing MAC airport facilities as well as the potential new airport sites in Dakota County. As stated in the Draft Plan, *"All living things (including humans) in the MNRRA corridor are interdependent."* To this end, MAC requests an assessment of the impacts of the MNRRA plan alternatives on the issues identified in this letter.

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6. This plan would not substantially affect existing development. While improvement along the riverfront is desired, the plan concentrates on new development in the corridor.

7. This plan is not intended to address site-specific issues since it is a conceptual policy-level document for the entire corridor. Certain site-specific issues and proposals would be reviewed by the National Park Service as described in the Partner Roles section of the plan. Because airport improvements would probably require a federal permit, the National Park Service would review any such proposals as mandated by the MNRRA legislation.

8. This plan does not address site-specific issues. See response to comment G-49-7.

9. This is beyond the scope of the plan. These are site-specific projects that would be reviewed through established review processes at the appropriate time.

10. Alternative B was not selected as the proposed plan.

Thank you again for this opportunity to respond. If there are questions regarding these comments, please contact me.

Sincerely,

Nigel D. Finney
Deputy Executive Director, Planning and Environment

Enclosures: Draft AED, New Airport Site Selection Study
St. Paul Downtown Airport, Long-Term Comprehensive Plan, Proposed Development

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Parks and Recreation Department
Gregory A. Mack, Director

2015 N. Van Dyke Street
Maplewood, MN 55109-3796

Tel: 612-77
Fax: 612-77

October 8, 1993

Ms. Joanne Kyral
Superintendent
Mississippi National River & Recreation Area
175 East Fifth Street, Suite 418
Box 41
St. Paul, Minnesota 55101

Dear Joanne:

Enclosed is a resolution adopted by the Ramsey County Board of Commissioners on October 5, 1993, regarding the Draft Comprehensive Management Plan/Environmental Impact Statement for the Mississippi National River and Recreation Area. The resolution reflects Ramsey County's interests and concerns as a general purpose governmental entity providing a broad spectrum of public services.

Ramsey County appreciates the opportunity to review and comment on the proposed plan and looks forward to being a full partner in its future implementation.

Sincerely,

Gregory A. Mack/clm

Gregory A. Mack
Director

GAM/clm
Enclosure
cc: Bonnie Jackelen

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Resolution

Board of

Ramsey County Commissioners

Presented By Commissioner Wedell Date October 5, 1993 No. 93-570

Attention:
Budgeting and Accounting
Greg Mack, Director, Parks and Recreation

WHEREAS, The 72-mile river corridor within the St. Paul/ Minneapolis Metropolitan Area has been designated by the United States Congress as the Mississippi National River and Recreation Area for the following purposes: 1) To protect, preserve and enhance the significant values of the waters and land of the Mississippi River corridor within the St. Paul/Minneapolis Metropolitan Area; 2) To encourage adequate coordination of all governmental programs affecting the land and water resources of the Mississippi River corridor; and 3) To provide a management framework to assist the state of Minnesota and its units of local government in the development and implementation of an integrated resource management program for the Mississippi River corridor in order to assure orderly public and private development of the area; and

WHEREAS, By congressional directive, the Secretary of the Interior appointed a 22-member commission to assist the National Park Service in the development and implementation of a plan to guide and coordinate the efforts of local, state and federal agencies in managing the river and its resources; and

WHEREAS, The Mississippi River Coordinating Commission and the National Park Service have prepared a Draft Comprehensive Management Plan/Environmental Impact Statement and have presented it for public review and commentary; and

WHEREAS, The Board of Ramsey County Commissioners recognizes that the Mississippi River is a valuable community asset that should be respected and nurtured; and

WHEREAS, Ramsey County owns properties on the Mississippi River in downtown Saint Paul that have historically been and are currently used as locations for service, commercial and industrial uses; and

RAMSEY COUNTY BOARD OF COMMISSIONERS

	YEA	NAY	OTHER
Diane Ahrens	___	___	___
John Finley	___	___	___
Ruby Hunt	___	___	___
Norgard	___	___	___
en Schaber	___	___	___
Brenda Thomas	___	___	___
Dick Wedell	___	___	___

Hal Norgard, Chairman

(Continued)

By _____
Chief Clerk - County Board

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Resolution

Board of

Ramsey County Commissioners

Presented By Commissioner Wedell Date October 5, 1993 No. 93-570

Attention:
Budgeting and Accounting
Greg Mack, Director, Parks and Recreation

WHEREAS, The Ramsey County Parks and Recreation Commission has reviewed the Draft Comprehensive Management Plan/Environmental Impact Statement and found that the proposed plan provides an appropriate framework for the coordination of natural, cultural and economic resource protection within the corridor; Now, Therefore, Be It

RESOLVED, That the Ramsey County Board of Commissioners indicate its conceptual support for the Draft Comprehensive Management Plan/Environmental Impact Statement for the Mississippi National River and Recreation Area; and Be It Further

RESOLVED, The County Board understands that the proposed plan does not legally restrict the County's right to use and redevelop these properties and it is the Board's intention to use and develop its properties along the Mississippi River in Saint Paul to provide services to residents; and Be It Further

RESOLVED, That the Board of Ramsey County Commissioners will encourage the use of designs and landscaping that will complement the surrounding environment when it undertakes a project that will lead to a major change in the facade of a County facility in the corridor; and Be It Further

1 RESOLVED, That Ramsey County, as a principal land owner, should be included as one of the local governments in the management partnership described in the proposed plan; and Be It Further

RESOLVED, That the Board of Commissioners supports further study of the issues and concerns regarding roads, roadway access, bridge crossings, aviation and rail facilities, barge traffic, and commercial navigation in the corridor; and Be It Further

RAMSEY COUNTY BOARD OF COMMISSIONERS	YEA	NAY	OTHER
Diane Ahrens	___	___	_____
John Finley	___	___	_____
Ruby Hunt	___	___	_____
Hal Norgard	___	___	_____
Warren Schaber	___	___	_____
Brenda Thomas	___	___	_____
Dick Wedell	___	___	_____

Hal Norgard, Chairman

(Continued)

By _____
Chief Clerk - County Board

1. All counties are considered as local government partners in the project.

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Resolution

Board of

Ramsey County Commissioners

Presented By Commissioner Wedell Date October 5, 1993 No. 93-570

Attention:
Budgeting and Accounting
Greg Mack, Director, Parks and Recreation

Page 3 of 4

RESOLVED, That the Board of Commissioners, upon recommendation of its Parks and Recreation Commission, offers the following specific comments with respect to the Draft Comprehensive Management Plan/Environmental Impact Statement:

1) Supports the general concept that the natural appearance and functions of the river corridor would be maintained and restored while protecting cultural and economic resources.

2) Supports policies and actions which will provide for improvement of water quality and reduction of air pollution.

3) Supports policies and plans to protect and restore wetlands in the corridor.

4) Supports policies and actions which will ensure that recreational, commercial and industrial uses in the river corridor can be accommodated in a safe environment.

5) Supports the establishment of the National Park Service's principal interpretive center for the Mississippi National River and Recreation Area within the City of St. Paul.

2 6) Supports the concept of restricting new developments in the riverfront area (defined as the first 300 feet back from the river's ordinary high water level) to those developments that have a relationship to the river, a need for river location or the capability to enhance the river environment. If developments require a river location, public access and natural resources preservation should be a consideration in design and use of the facility.

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RAMSEY COUNTY BOARD OF COMMISSIONERS	YEA	NAY	OTHER
Diane Ahrens	___	___	_____
John Finley	___	___	_____
Ruby Hunt	___	___	_____
Norgard	___	___	_____
ren Schaber	___	___	_____
Brenda Thomas	___	___	_____
Dick Wedell	___	___	_____

Hal Norgard, Chairman

(Continued)

By _____
Chief Clerk - County Board

2. The revised riverfront policy still reflects these concepts.

Resolution
Board of
Ramsey County Commissioners

Presented By Commissioner Wedell Date October 5, 1993 No. 93-570
Attention:
Budgeting and Accounting
Greg Mack, Director, Parks and Recreation

7) Supports the establishment of a continuous pedestrian and bicycle trail as close to the river as practical and provide strategic connections between the river and the downtowns' neighborhood areas and nearby parks and open space.

8) Supports the dual role of the Metropolitan Council coordinating land use planning and the Minnesota Department of Natural Resources reviewing local actions for conformance to the plan.

9) Supports the proposal to provide up to fifty percent (50%) matching grants to state and local governments for the acquisition and development of parks, trails and open space within the corridor.

RAMSEY COUNTY BOARD OF COMMISSIONERS

	YEA	NAY	OTHER
Diane Ahrens			Absent
John Finley	X		
Ruby Hunt	X		
Hal Norgard	X		
Warren Schaber	X		
Brenda Thomas	X		
Dick Wedell	X		

Hal Norgard, Chairman

By _____
Chief Clerk - County Board

Federal Reserve Bank of Minneapolis

250 Marquette Avenue
Minneapolis, Minnesota 55401-0291

October 8, 1993

Ms. JoAnn Kyral
Superintendent
Mississippi National River and
Recreation Area
175 East 5th Street
Suite 418, Box 41
St. Paul, Minnesota 55101

Dear Ms. Kyral:

Thank you for the opportunity to comment on the Draft Comprehensive Management Plan Environmental Impact Statement ("Draft Management Plan") of the Mississippi National River and Recreation Area dated June 1, 1993.

The Bank has little expertise regarding much of the technical and public policy issues addressed in the document and hence can offer few comments on what appears to me to be an extensive and well thought out product. We do, however, want to call your attention to the set-back and height guidelines specified on page 27 of the document.

As your staff may already have informed you, the new Federal Reserve Bank building scheduled for construction on the Bridgehead site in downtown Minneapolis does not comply with the proposed height guidelines. I am assuming this will not prove to be a problem. We have worked intensively with your staff as well as staff from the City of Minneapolis and the Minneapolis Park and Recreation Board staff over the past eighteen months or more to assure that our design will make a strong positive contribution to both the downtown urban landscape and to the Mississippi River and immediately surrounding areas. In these discussions building height has not been raised as a potential problem.

1 Many of the existing buildings in downtown Minneapolis also do not conform with the Draft Management Plan. I suggest the Mississippi River Coordinating Commission adopt different height guidelines for major built up urban areas so that these existing buildings as well as the new Bank building are not in conflict.

Thank you again for the opportunity to comment on the Draft Management Plan. If you would like to have further discussion on any of the general issues they raise, or on matters peculiar to the new Federal Reserve Bank building, please call me at 340-2260.

Sincerely,

Ronald E. Kaatz
Senior Vice President

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1. The plan was revised to clearly except downtown areas from the specific height limits recommended in the plan.

PATRICIA PARISEAU
Assistant Minority Leader
Senator 37th District

Senate
State of Minnesota

October 11, 1993

Ms. JoAnn Kyral, Superintendent
National Park Service
Mississippi National River & Recreation Area
175 East Fifth Street, Suite 418
Box 41
St. Paul, Minnesota 55101

Dear Superintendent Kyral:

After spending some time reviewing the draft comprehensive management plan, P.L 101398 (establishing the CORE Study Commission) and P.L.100-696 (Mississippi National River & Recreation Area) I'd like to comment on several points on the plan. I'll not cover every point which I question, but only those of highest concern to me:

1 ■ The law establishing MNRRA, a multiple use concept, requires that coordination and consolidation of permitting take place, and that state and local efforts will provide the foundation for that coordination. Circumvention of this concept should not be attempted.

2 ■ Usurpation of state and local control by federal agencies is clearly outside the intent and the letter of the law, and amounts to an attempt to expand on the law without authority to do so.

3 ■ The draft plan indicates no economic impact study was done even though the plan would have potentially great effects on the economic vitality of the region. Little mention is made of industry other than a reference to barge shipping. Such oversight must be remedied before the final draft.

4 ■ Economic impact of such a far reaching plan is equally important as environmental, cultural, scientific, recreational and other concerns.

5 ■ In direct contrast, mention is made of natural and cultural interests gaining preference over economic interests in case of dispute. To ignore the area's economic value, is also not within the intent of the law.

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1. The plan states that the National Park Service would support the current efforts of the state to address coordination and consolidation of the permitting process.

2. The plan was revised to further stress local control. Local government would retain control of land use decisions in the corridor, consistent with applicable state and regional land use management programs. The plan is not a regulatory document and does not mandate actions by non-NPS entities.

3. An economic impact analysis was carried out by a University of Minnesota professor and the NPS planning team for the study, which concluded that there would not be significant economic impacts on the region. Some changes in the plan would be made to address specific economic impact concerns. Commercial navigation receives relatively greater emphasis in the plan because it is specifically referenced in the MNRRA legislation and was the subject of greater public interest during scoping efforts for the draft plan/environmental impact statement.

4. All impact categories were considered as equally important in the environmental impact statement.

5. Economic "resources" have equal protection in the MNRRA legislation and in the comprehensive management plan, but economic activities and new development are treated differently under the law and the plan. The MNRRA plan recognizes these activities and development and proposes to manage them in a way that is consistent with resource protection.

6 ■ The draft plan appears to set up the NPS as the lead agency, mentions NPS's own monitoring system. NPS reviewal of all permit applications, extensive land acquisition plans, but makes no mention of fair compensation to the land owner.

Add to this the very legitimate concern of private land owners that NPS will be able to interrupt plans for economic uses or expansions of businesses and direct that land to open use by administrative caveat. In reality, the Study Commission recommended that the legislation provide no new authorization for land acquisition for land along the Mississippi River.

7 ■ If NPS has administrative power in the plan, another layer of bureaucracy will have been added to the process that you charged with streamlining. This move would in effect add extensive powers to government agencies and would cause the plan to supersede all programs operating in the region. Even to a casual observer, this clearly goes beyond the laws intent.

8 ■ Questionable also is the intent to have the draft plan be in effect before the adoption of the final plan.

9 Omissions from the plan noted are:
- ■ a lack of data to support the plans management points
- ■ lack of details where needed
- ■ and no analysis is provided to support what appears to be staff opinion in much of the plan

I've reviewed some of the comments provided by private concerns, some Minnesota agencies and elected officials, and agree with many suggestions that were made. There are a few I would like to stress as well. Recommendations to cooperatively accomplish the goals for multiple use in the MNRRA Plan:

10 1) NPS should stay within the bounds of the current laws. The Commission stated that "the national government should assist in coordinating ....." not co-opt the process. Expansion that would force state and local law changes to comply with the proposal are not within NPS's authority, nor should NPS be seeking congressional changes of that scope.

11 2a) An economic impact study and thorough analysis of its findings should be done before including it in a final draft of the plan.

11 2b) Assure that economic interests have equal stature with other

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6. The National Park Service has the lead only in coordinating interpretive activities, developing an interpretive center, issuing implementation grants, and developing certain follow-up plans. Some text was added to say that existing laws providing compensation for land acquisition would be followed. Local government regulations to implement the plan should not be so severe as to require compensation. The National Park Service intends to acquire only about 5 acres. Additional land acquisition would be the responsibility of local government and would be done according to their plans and following existing regulations.

7. As the final plan clarifies, the National Park Service would not have administrative power, and there would not be another layer of government.

8. The final plan would be implemented after it is approved.

9. The document was based on extensive data, some of which is reproduced in the plan. Also see response to comment G-2-2.

10. The proposal for new state legislation was dropped. Local governments would not be forced to make changes in their laws to implement the MNRRA plan. The MNRRA plan adopts and incorporates the existing land use management system for the corridor with voluntary efforts to go beyond that system through an incentives approach.

11. See response to comment G-46-3.

12. The plan was clarified to state that economic resources are equal to other resources stated in the law. Economic activities and new development are to be managed to preserve corridor resources, including economic resources that existed when the MNRRA legislation was enacted in 1988.

interests stated in the law and the plan.

13 2c) Updated information should be sought on the barge industry since that which was used in creating the draft plan is outdated.

14 2d) Include industry throughout preparation of the plan for much data can be found there and better analysis obtained.

15 3a) Retain state and local control in the permitting process. MPCA and DNR are monitoring, prioritizing, and permitting in a rational, timely manner now.

16 3b) Do not empower NPS to administratively mandate compliance, or to co-opt with their own monitoring, reviewal, and permitting process.

17 3c) No land acquisition:
- without all the above having been accomplished
- before adoption of a final draft
- without public hearing and comment
- without just compensation to the landowner

18 4) No points of the plan should be in effect before adoption of the final draft.

19 5) NPS should support all conclusions with substantiated data and analyses.

I appreciate the opportunity to comment on the draft plan and expect to work cooperatively with all who have an interest in maintaining the region in a manner sensitive to all its constituents.

Sincerely,

PATRICIA PARISEAU
State Senator

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13. The final plan supports this claim and includes new text recommended by representatives of the commercial navigation industry.

14. Industry representatives were heavily involved in planning process. See response to comment G-53-13.

15. The plan does this.

16. The National Park Service would not mandate but would encourage compliance with the MNRRA plan.

17. The National Park Service does not intend to acquire land, other than the proposed donation of about 5 acres from the city of St. Paul for an interpretive center. State and local land acquisition would take place under existing state and local authorities and procedures.

18. This is the procedure that the National Park Service is following. However, the MNRRA legislation does grant the National Park Service some monitory responsibilities prior to plan approval.

19. This has been accomplished during the planning process. The analyses are the work of the NPS planning team and a commission that has representation from several state and local agencies with extensive expertise with MNRRA corridor issues.

District Energy ST. PAUL, INC.

Hans O. Nyman Energy Center
76 West Kellogg Boulevard
St. Paul, MN 55102-1611
(612) 297-8955
FAX (612) 221-0353

September 9, 1993

National Park Service
Ms. JoAnn Kyral, Superintendent
Mississippi National River and Recreation Area
175 E. Fifth Street, Suite 418
P.O. Box 41
St. Paul, MN 55101

Dear Superintendent Kyral:

District Energy St. Paul, Inc. (District Energy) is a nonprofit, 501(c)(3), operating utility and a occupant of the Mississippi River Corridor that is the subject of the Draft Comprehensive Management Plan, Environmental Impact Statement on the Mississippi National River and Recreation Area (the "draft Plan"). District Energy was founded as a demonstration program and, indeed, it is the most unique utility in America. The nonprofit corporation was founded to demonstrate the reliability and desirability of providing a district-wide service of heating energy and, as of April this year, cooling energy. District Energy is an environmentally desirable, fuel efficient program that serves 74 percent of the heating needs in downtown St. Paul and is currently, rapidly, demonstrating the desirability of district-wide cooling.

District Energy respectfully requests exemption from the application of any and all rules, regulations, compliance and permit requirements the may result from the implementation of the draft Plan.

The assumptions underlying the creation of this corporation and its approval at the local, state and federal levels adequately protect environmental concerns by vigorous regulation and high engineering standards. Downtown St. Paul is an economically distressed area. Our customer base consists of many non-profit organizations, hospitals, local units of government and substantial low income housing. All of our customers made a considerable commitment to a 30-year demonstration program that has a remaining 19-year term. The financial structure of this corporation are sensitive to and will not tolerate imposition of another layer of regulation.

We would be delighted to meet with you or your staff to provide you with all the additional reasons, together with amplification on what has been presented above.

1 Again, we respectfully request an exemption from any resulting program for this Corridor.

1

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1. The MNRRA legislation does not provide the legal authority to grant exemptions to specific businesses for programs implementing the plan. However, it does concentrate primarily on new uses rather that existing uses. The final MNRRA plan adopts existing state and regional land use management programs affecting the corridor.

COMMENTS

Superintendent Kyral
September 9, 1993
Page 2

District Energy joins with the Stakeholders' Coalition. All members of the Stakeholders' Coalition believe in the continued enjoyment, protection, and multiple use of the Mississippi River. The success of this region in protecting the river and responding to new opportunities to improve the Mississippi River speaks volumes to the care and concern extended by Minnesotans.

The Stakeholders' Coalition further supports the request that went to Congress in 1986 from the Mississippi River Corridor Study Commission (MRCSC). That study recommended a national designation for the corridor, federal matching funds for completion of the existing trail plan, and coordination and consolidation of governmental regulations in the area.

Significant amounts of time have been extended to date, and all members of the Mississippi River Coordinating Commission (MRCC) are applauded for their time spent reviewing many pages of materials. As stated in previous draft plans, Minnesotans have done an outstanding job of caring for the Mississippi for more than 140 years. The MRCC is a continuing demonstration of that commitment.

Nonetheless, this plan requires significant additional definition and refinement before being approved and forwarded.

The Stakeholders' Coalition presents the following three (3) major points as the foundation of our response to the draft Plan. These points are supported, and recommendations for corrective action are taken, in the attached document.

First, the draft Plan does not meet all of the requirements of the law.

The draft Plan does not adequately meet significant requirements of the federal law (P.L. 100-696). The people of Minnesota requested, and the United States Congress directed the development of a program to :

2 * coordinate and consolidate the "permitting" processes,

3 * use federal matching funds (primarily) to complete the walking/biking/skiing trail system as already planned along the corridor, and

4 * create "policies and programs for the commercial utilization of the Area and its related natural resources, consistent with the protection of the values for which the Area is established as the MNRRA."

This draft Plan may have a serious *negative* effect on jobs and economic growth in Minnesota. The draft Plan's unnecessary vagueness about new regulations and permitting processes leaves

RESPONSES

2. The plan sets out a program to coordinate and consolidate the permitting process.

3. The legislation does not limit the grant program to already planned components, although they might be a high priority for local government and could be funded first.

4. This requirement is met in the Land and Water Use section of the plan.

employers and communities along the riverway, and those beyond the river (but affected by river activities), uncertain about what existing operations, new developments or expansion of existing facilities will be permitted. Because of this uncertainty, businesses are less likely to invest in this area or in Minnesota, which means they cannot sustain existing jobs or create new jobs.

5 The law directs the Plan be built upon existing local plans and programs. Instead, the draft Plan is replete with statements that laws be passed, either at the state or federal level, to *force* compliance. The draft Plan suggests local control may be severely restricted, which would be detrimental to effective policy creation and implementation.

6 The draft Plan has not adequately recognized transportation issues regarding the relationship between the activities within the designated river corridor and the region's transportation systems, as defined by the Metropolitan Council. Furthermore, the draft Plan does not acknowledge transportation's integral role in Minnesota's economic success in the global economy.

7 As currently drafted, the Environmental Impact Statement (EIS) for the draft Plan does not appear to meet the requirements of the National Environmental Policy Act (NEPA).

Second, the draft Plan fails to provide for the preservation, protection, and enhancement of economic resources.

8 The draft Plan does not provide "policies and programs for the commercial utilization of the Area and its related natural resources, consistent with the protection of the values for which the Area is established as the MNRRA." For example, an essential inventory of economic resources is deferred, while other resources are exhaustively detailed, charted, and quantified. In addition, the draft Plan recommends alternatives that "open space acquisition would place a greater emphasis on natural and cultural resource protection."

9 A clear process for fair compensation for the acquisition of land or interest in land is not provided for, when land is acquired under this draft Plan. Landowners (public and private) fear that they may have to go through a lengthy and costly legal process in order to be fully compensated for the value of any MNRRA-acquired lands.

10 The variance definition and procedure summarized in the draft Plan are inconsistent with local ordinances which are based on existing standardized state statutes. This inconsistency will likely cause confusion and delays in local ordinance administration - negatively impacting reasonable economic planning and development in the corridor.

Third, the draft Plan goes far beyond the intent and history of the law.

The draft Plan is inconsistent with the legislative history, intent and the "findings" of the law

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5. The proposal for state legislation was dropped from the plan.

6. A statement was added to the plan recognizing the relationship of transportation to the river corridor and the importance of transportation to the area economy.

7. The National Park Service believes that the environmental impact statement meets the requirements of the National Environmental Protection Act.

8. These are included in the Land and Water Use section of the plan.

9. There would be minimal land acquisition by the National Park Service, currently anticipated to be only about 5 acres through donation from the city of St. Paul. State and local land acquisition in the corridor would follow existing laws and procedures for fair compensation and property rights would be protected. A statement was added to the open Space and Trails section of final plan that applicable laws would be followed.

10. The variance discussion in the text was revised and simplified to remove any potential for inconsistency with state law.

COMMENTS

Superintendent Kyral
September 9, 1993
Page 4

11 (P.L 100-696). The draft Plan contains programs and policies that go far beyond the request from Minnesotans, the original intent of the law and the law itself, by creating additional levels of bureaucracy and attempting to grant powers not authorized under the law.

The law defines the requirement that the Plan "recognizes economic activities with the Area and provides for the management of such activities, including barge transportation and fleeting and those indigenous industries and commercial and residential developments which are consistent

12 with the findings and purposes of this subtitle." The draft Plan could convert land to open spaces, regardless of the current owner's use and intent, or the existing Comprehensive Plan approved by the Metropolitan Council.

13 Because of the vagueness and ambiguities of the draft Plan, there is a strong concern that the National Park Service's traditional authority to regulate in National Parks will be applied along the river corridor and will lead to the imposition of many "administratively initiated" sections of the Code of Federal Regulations (CFR).

14 Efforts by NPS to review Air Quality permits inside **and outside** of the corridor, to plan for additional authority to become environmental regulators in addition to the Minnesota Pollution Control Agency (MPCA) and the federal Environmental Protection Agency (EPA), and to change existing zoning by mandate, are not specifically authorized in the law.

Clearly the draft Plan should more precisely reflect the history, scope, vision and intent of the original law. To do so requires the completion of required components, the elimination of ambiguities, and the removal of federal initiatives and assumption of powers not authorized in the law.

The attached pages detail some of the changes necessary to ensure that economic vitality, as well as important recreational, cultural and environmental resources, are adequately protected. Without written assurance of this protection, the draft Plan should not go forward. We appreciate the opportunity to comment on this draft Plan.

Sincerely,

Anders J. Rydaker
President

Attachment

:\gf\MNRRA-1

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RESPONSES

1.1. The National Park Service and the commission believe that the plan is within the letter and intent of the law. The final plan was revised to reduce the concern about additional levels of bureaucracy and powers not authorized under the act.

1.2. The MNRRA plan allows for many uses other than open space and relies heavily on existing plans.

1.3. The use of 36 CFR is limited to NPS-owned land in the corridor, which is envisioned to be a total of less than 50 acres.

1.4. The National Park Service would review air quality permits for projects in the corridor as mandated in the MNRRA legislation but would not become an environmental regulator. The text was revised to remove the statement "inside and outside the corridor," with the understanding that the National Park Service might review permits for activities outside the corridor but is not obligated to do so in all cases.

UPPER MISSISSIPPI WATERWAY ASSOCIATION

INCORPORATED 1932
P.O. Box 7806
St. Paul, Minnesota 55107
612-776-3108

Dedicated to navigation and sound water resource management.

September 10, 1993

Ms. JoAnn M. Kyral
Superintendent
Mississippi National River & Recreation Area
175 Fifth Street East
Suite 418
Box 41
St. Paul, MN 55101-2901

Dear Ms. Kyral:

Enclosed is Upper Mississippi Waterway Association's (UMWA) response to Draft Comprehensive Management Plan Environmental Impact Statement, June 1993.

We limited our remarks to five specific areas which are of immediate concern to our membership:

1. This Document does not provide a balance between economic, environmental and historical concerns,
2. This Document does not meet the requirements of PL 100-696 and insufficiently recognizes the importance of the Mississippi as a working river,
3. The MNRRA Document must be implemented in a way which will not diminish the status of the Upper Mississippi River among commercial transportation systems supported by federal expenditures,
4. The Document does not recognize the "environmental friendly" nature of commercial navigation, and
5. Purchase of private land or interest in land is not clearly provided for.

While we have approached these issues from a policy perspective, recommendations have been offered as well.

Other areas of the Document are of concern to us, however they will be addressed during future phases of the process.

Members, staff and officers of UMWA thank you and members of NPS staff for the sincere efforts put forth in attempting to comprehend the many and varied problems relating to the placement of a recreational area onto an already urbanized landscape.

Cordially,

James C. Hartman
President

Attachments: Membership list
Reply statement

The Mississippi River Lock and Dam Navigation System—lowest cost transportation for agriculture and industry—linking domestic and world trade areas by water with the Upper Midwest; providing stable water levels for municipal, private, commercial, recreational, wildlife, and aquatic interests; an environmentally sound, self-renewing economic resource for the entire nation.

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Upper Mississippi Waterway Association

Representative Membership List

1992-1993

Alexander & Alexander, Minneapolis, MN
American Commercial Barge Line, Jeffersonville, IN
American Iron & Supply, Minneapolis, MN
American River Transportation, Decatur, IL
Bassford, Heckt, Lockhart & Mullin, Minneapolis, MN
Bay West, St. Paul, MN
J. F. Brennan Company, LaCrosse, WI
Cargo Carriers, Inc., Minneapolis, MN
Cominco Fertilizers, Minneapolis, MN
Continental Grain Company, Minneapolis, MN
Corcoran, Skiver, Zito, Dekoter & Thole, Sibley, IA
Cruise Aweigh, Inc., Minneapolis, MN
Dairyland Power Cooperative, LaCrosse, WI
Dakota Barge Service, Newport, MN
Determann River Terminal, Camache, IA
Economy Boat Store, Wood River, IL
Farmland Industries, Kansas City, MO
Ford Motor Company, St. Paul, MN
John W. Gorman, Inc., Bloomington, MN
Great Lakes Coal & Dock, St. Paul, MN
Harvest States Cooperatives, St. Paul, MN
Hawkins Chemical, St. Paul, MN
Ingram Barge Line, Paducah, KY
Interstate Power, Dubuque, IA
Johnson & Lindberg, Minneapolis, MN
Koch Carbon, St. Paul, MN
Koch Refining Company, St. Paul, MN
John W. Lambert, St. Paul, MN
Richard Lambert, Burnsville, MN
Lambert & Boerder, Wayzata, MN
Lametti & Sons, Hugo, MN
Marquette Transportation Co., Inc., Paducah, KY
L.. W. Matteson, Inc., Burlington, IA
Midland Enterprises, Inc., Cincinnati, OH
Midwest Agri Commodities, Minneapolis, MN
Minneapolis Grain Exchange, Minneapolis, MN
City of Minneapolis
3M, St. Paul, MN
Missouri Barge Line, Cape Girardeau, MO
NEWCO Marine, Inc., Paducah, KY

Newt Marine Service, Dubuque, IA
Northern States Power Company, Minneapolis, MN
Prairie Sand & Gravel, Prairie Du Chen, WI
R.E.D. Marine, Newport, MN
Red Wing River Towing, Red Wing, MN
Riverway Co., Minneapolis, MN
Robers Dredge, Inc., LaCrosse, WI
J.L. Sheily Company, Eagan, MN
St. Paul Port Authority
Thell Properties, W. St. Paul, MN
Tow, Inc., St. Paul, MN
University of Minnesota, Minneapolis, MN
Upper River Services, St. Paul, MN
Warehouse Shell Sales, Newport, MN
The Waterways Journal, St. Louis, MO
Waterways Transp. Management Co., St. Paul, MN
Westway Trading Corporation, Minneapolis, MN
Williams Pipe Line Co., St. Paul, MN
Willie's Hidden Harbor Marina, St. Paul Park, MN
City of Winona Port Authority, Winona, MN
Winona Marine, Inc., Winona, MN
Wisconsin Power & Light, Madison, WI

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Upper Mississippi Waterway Association
(UMWA)

Position Paper
In response to
Draft Comprehensive Management Plan
Environmental Impact Statement
June 1993

The Comprehensive Management Plan for the Mississippi National River and Recreation Area (MNRRA) and its Environmental Impact Statement ("Document") are seriously flawed. The MNRRA Management Plan must be rewritten to address the following issues. Where appropriate, suggestions as to deletions to original language in the Document will be indicated by strikethroughs and additions will be indicated by underscoring.

1 **1. Discussion in the Document regarding the Resource Management Plan (RMP) does not provide a balance between economic, environmental and historical concerns.**

In particular, this Document states that there will be a deferral of an inventory of economic resources, while, at the same time, other resources are exhaustively detailed, charted and quantified. Unless there is clear understanding of the vision for Economic resources including an inventory of economic resources, a scope of sustainable development and agreed-to-definitions, this document must not proceed. To defer development of these critical economic details until **after** a Comprehensive Management Plan is adopted is to totally overlook a crucial, pivotal and decisive element of the Plan and to ignore a fundamental section of the authorizing legislation.

Examples:
The Document specifically defines and discusses natural resources including geology, physiography (p. 111), mineral resources (p. 112), soils (p. 113), vegetation (p. 113), fish and wildlife (p. 114), threatened and endangered species (p. 116), water resources (p.120), wetlands (p.122) climate (p. 122), air quality (p. 123), noise pollution (p. 123), and cultural resources (p. 123). In addition, the Glossary of Terms contain a litany of definition of terms relating to the above mentioned subjects. However, the definition of *"Economic resources"* is, in our judgment incomplete, but what is worse, ends with the statement *"Note: This should be considered an interim definition for comprehensive planning purposes. A more thorough, updated definition will be developed after the comprehensive plan is completed during resource management planning"*.

While barge fleeting was addressed as a specific issue, other crucial economic resources have been overlooked. We find it more than curious that the Document clearly defined the parameters for scenic, historic, natural, recreational and scientific values of the River which the Act specifies. Only with "*economic*" values is there confusion which requires further study to address. We also find it more than curious that the definition of "*economic resources*" is subject to "*a more thorough, updated definition after the comprehensive plan is completed...*" (Our emphasis).

UMWA's objection to deferred analysis of economic resources is two-fold: (1) As scheduled, the Document will be approved before a serious economic inventory or analysis is performed. Sincerity to incoroprate an economic inventory and analysis **after**

1. The resource management plan will address all resources identified in the MNRRA legislation.

the Document is adopted, could be verified and validated by conducting these studies while the findings can still be incorporated in the Document. (2) If an economic inventory is not conducted, and economic resources are not defined until after the Document is adopted, UMWA and other public participation will be excluded.

Recommendations:
1) Do not allow this Document to move forward until this Document defines Economic Resources as follows: (3) Page 238, Glossary, Definition of "Economic resources".

2

"Economic resources - include existing and future facilities, land uses, and activities that benefit the local, ~~and~~ regional, national and international ~~economiesy~~ such as: (1) residential, commercial, agricultural, mining and industrial property, equipment and services, (2) public facilities used for economic purposes such as, but not limited to ~~locks~~ and dams, roads, bridges, municipal water systems, waste water treatment plants, power generating and transmission facilities, public and private boat-launching facilities and other infrastructures, ~~and~~ (4)(3) the value of commodity shipments into and out of the area, including the economic value of river navigation services to the local, regional, ~~national~~ and international ~~economiesy and~~. (3)(4) jobs and their associated payrolls, ~~Note: This should be considered an interim definition for comprehensive planning purposes. A more thorough, updated definition will be developed after the comprehensive plan is completed during resource management planning.~~

3

(2) Page 48 "Economic Resource Research Needs". The research needs and data collection proposed in this section should be done **before** this Document is adopted by the Commission.

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2. The definition of economic resources in the glossary was revised to address this comment.

3. Some data was added, but the level of detail requested is beyond scope of this document.

4 **2. This Document does not meet the requirements of PL 100-696 and insufficiently recognizes the importance of the Mississippi as a working river.**

Section 703(3)(g) states:
"...the Secretary, the State of Minnesota and local units of government, endeavoring to use existing Federal, State, regional and local plans and programs where consistent with the intent and goals of this subtitle in developing the following:

1) Policies and programs for the preservation and enhancement of the environmental values of the Area.
2) Policies and programs for enhanced public outdoor recreational opportunities in the Area.
3) Policies and programs for the conservation and protection of the scenic, historical, cultural , natural and scientific values of the Area.
4) Policies and programs for the commercial utilization of the Area and its related natural resources, consistent with the protection of the values for which the Area is established as the Mississippi National River and Recreation Area."

Section 701(a) Findings. –
The Congress finds that:
(1) The Mississippi River Corridor within the Saint Paul-Minneapolis Metropolitan Area represents a nationally significant historical, recreational, scenic, cultural, natural, economic and scientific resource. (Our emphasis).
(2) There is a national interest in the preservation, protection and enhancement of these resources for the benefit of the people of the United States. (Our emphasis).

Section 701(b) Purposes –
The purposes of this subtitle are:
(1) To protect, preserve and enhance the significant values of the waters and land of the Mississippi River Corridor within the Saint Paul-Minneapolis Metropolitan Area. (Our emphasis).

The act charges the commission with developing "policies and programs for the commercial utilization of the corridor consistent with the values for which the area was established."

5 Upper Mississippi Waterway Association submits that there are no specific policies or programs detailed in the Document for economic utilization as required by this section of the law.

Upper Mississippi Waterway Association submits that specific policies and programs for the enhancement of recreational, historic, scenic environmental and other values are amply provided for in the MNRRA plan. The plan (p. 9) wrongly dismisses economic utilization by simply stating that: *"nationally significant economic resources were not defined in the legislation."*

The Document minimizes *"economic uses"* and pushes this portion of the legislative requirement into a section of the process which does not allow for adequate input from waterway, business or industry interests.

Congress found that the Mississippi River Corridor within the Saint Paul-Minneapolis Metropolitan Area represents a nationally significant economic resource.

3

4. It is the opinion of the National Park Service and the commission that the document meets the requirements of the MNRRA act. Nowhere in the law does it refer to a "working river," but the plan does make several references to this concept.

5. The Land Use, Commercial Navigation, and Economic Resource Management sections of the final plan include policies for economic use of the corridor.

Congress found that there is a national interest in the preservation, protection and enhancement of economic resources for the benefit of the people of the United States.

Congress determined that the purposes of this subtitle include the protection, preservation and enhancement of economic resources within the Saint Paul-Minneapolis Metropolitan Area.

Examples: The Mississippi River is crucial to Minnesota's economic system. The river is a critical link between Minnesota and the world economy. Minnesota provides a wide diversity of jobs and a healthy environment in which to live and work; understanding that employment is synonymous with concern for the environment. A canner in Sleepy Eye, a Red River wheat farmer, a Rock County hog farmer and a Northfield cereal manufacturer are representative of food and agricultural companies in Minnesota which rely upon a healthy and vibrant transportation network, of which the Mississippi River is an integral part.

This Document's vagueness leaves employers along the river way and those beyond the river that are also affected by river activities uncertain about what new developments or expansions of existing facilities will be permitted. Because of this uncertainty, as National Park Service meeting transcripts will validate, businesses are less likely to invest in this area and to sustain or create new jobs.

This Document dictates (p. 37) the establishment of monitoring programs to evaluate potential needs and impacts of barge fleeting areas and to evaluate management alternatives to expanding existing fleeting areas, but is vague as to which body will set up evaluation programs and evaluate management alternatives.

6

Recommendations:
(1) Page 34-37, Commercial Navigation.
Delete everything after "Commercial Navigation" on page 34 and going through 2nd paragraph on page 37 ending with the words "during the life of this plan", and substitute the following wording:

"In the 1930's, the federal government, in an effort to open the midwest agricultural economy to international markets and to create employment and other economic benefits, began the construction of the Upper Mississippi River navigation system. Benefits of the construction of that system and its locks and dams have spread over many activities beyond just commercial navigation. With the construction of the locks and dams, huge pools of water were formed. These pools provide valuable fish and wildlife habitat and vast expanses of water for recreational use, municipal water supply and water supplies for a number of industrial and agricultural uses.

Commercial navigation provides an economical, safe, energy efficient and environmentally friendly form of transportation for millions of tons of freight each year. It provides the Twin Cities region and upper Midwest with a vital link from the nation's agricultural heartland to domestic and international markets. The terminals in the region are a focal point for shippers that serve a large part of the upper Midwest. River terminals in the Twin Cities region annually handle 15 to 20 million tons of commodities. The river system provides efficient transportation to and from the region, including:

____ grain and mill products shipped to processors throughout the nation's heartland and to export terminals at the mouth of the river near the Gulf of Mexico

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6. This section was revised to address this comment using additional text provided by the Corps of Engineers.

other major long-haul southbound shipments include coal, potassic fertilizer, scrap iron, and petroleum coke

inbound shipments of coal, phosphatic fertilizer, salt, petroleum products, chemicals, cement, steel, and pipe

large local movements of sand and gravel and petroleum products.

Because of its energy efficiency, the towing industry provides service to the midwest at costs far below those of the bulk transportation modes. It also helps maintain the competitiveness of rates of competing modes. Beyond the industry's influence, in the Western Dakotas, land transportation rates to export terminals are significantly higher. Towing industry energy efficiencies also produce much lower levels of exhaust emissions and fuel use than do other modes, for the same volumes of freight movement.

Barge traffic levels fluctuate but maintain an upward trend. Based on those fluctuations, a study done by Temple, Barker and Sloane, in 1987, projected a leveling out of traffic through the year 2010. Another study (Fruin 1992) based solely on decreased grain movements caused by a loss of the Soviet market, projected even slower growth.

Other studies have projected continuous growth. They include the GREAT 1 study, the Mississippi Master Plan and the Mid America Ports Study. The most conservative estimates of maritime freight traffic growth on the Upper Mississippi River, in those studies, anticipate a steady 2% annual growth over the next 20 years. Following a dramatic drop from 23 million tons in 1984, to just over 16.5 million in 1985, traffic has grown to 19.5 million tons in Minnesota in 1991. The high level, in 1984, represents the impact of a severe drought in the eastern corn belt which forced additional grain purchases from the Minnesota agricultural community served by terminals in the Twin Cities' area. In 1992, the US Army Corps of Engineers recorded the third highest volume of goods movement through Lock and Dam 2 in history.

The increased growth in waterborne traffic, which is greater than projected by the two most recent studies of the area's potential, reflects a very small increase in grain but major increases in fertilizer, coal, aggregate and general cargoes. For the past 25 years, grain terminals on Minnesota's part of the river have contributed an annual average of 7% of the total national grain export volume".

7 (2) With regards to growth of navigation in the MNRRA corridor, Change Page 37, paragraph 3, 4th sentence as follows:
~~Decisions about commercial navigation uses would be based on resource values, emphasizing minimal impact on aquatic life. Local governments~~ "Commercial navigation growth in the Metro area will be based on shipper's increased cargo transportation needs. Fleeting growth will be based on the same increased transportation needs. New or expanded commercial navigation facility activity will be balanced with concern for other resource values in the corridor using historic environmental assessment procedures."

8 (3) Regarding future decisions and monitoring of commercial navigation, change Page 37, paragraph (1) as follows:
"Continue barge fleeting activities while protecting natural, cultural, and other economic resources. In concert with local commercial interests and commercial navigation representatives, Sset up monitoring programs to evaluate potential needs and impacts and allow for adjustments to existing fleeting areas or the establishment of new areas if needed to accommodate additional growth. and to Eevaluate management alternatives to expanding existing areas or creating additional commercial fleeting areas".

7. This statement was revised based on this and other comments. Please see the revised language in the referenced section.

8. The final plan makes additional commitments to public involvement in follow-up activities but generally avoids references to specific interest groups.

(4) To better understanding the Mississippi as a "working river", change Page 55, paragraph (5) as follows:
"(5) As a working river, the Mississippi's influence extends far from its shoreline. The Minneapolis/St. Paul metropolis is located where it is today because of the river. The Mississippi River provides power, drinking water, cooling water, waste ~~dilution and dispersal~~ treatment, and an economical method for transporting many commodities. These benefits have affected settlement patterns, industry, and commerce far from the river. The lock and dam system improved modern transportation on the river, and the locks and dams support many uses, including recreational boating. In addition, the year-around water pools established by the lock and dam system support the recreational pursuits of millions of people and supports a magnificent array of fish, birds, plants and wildlife habitat."

9

(5) To allow barge fleeting locations to be subject to local control, change Page 37 paragraph (2) as follows:
"(2) ~~Locate barge fleeting areas at least 200 feet from any marina, and preferably next to commercial or industrial areas.~~ Fleeting area locations would be based on physical needs for effective operations subject to local, state, and federal environmental and safety regulations.

10

(6) Change the definition of "working river" on page 242 of the Document to include land uses, as follows:
"Working river - a river that includes natural and manmade features used for utilitarian *purposes. The Mississippi has been extensively used* for over 200 years for navigation, municipal, and industrial water supply, hydropower, and waste disposal, commercial and industrial development, including intermodal connections. The commercial navigation industry is the best example of an activity that defines the Mississippi as a working river.

11

9. Recreation and wildlife concerns are covered in interpretive themes 3, 6, 7, and 8.

10. The proposed change would reduce specificity, which was requested by many other reviewers, and therefore was not incorporated.

11. This was added.

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COMMENTS

12

3. **The MNRRA Document must be implemented in a way which will not diminish the status of the Upper Mississippi River among commercial transportation systems supported by federal expenditures".**

This Document recognizes only vaguely or not at all the fact that the Mississipp. as a federally funded commercial waterway, is responsible for a wide variety of elements daily taken for granted. These include the Mississippi as a source of domestic water supplies, as a lane of interstate commerce, as a site of river-related commercial services and employment opportunities, as a location for impounded pool-related fishing and recreational pursuits and as a habitat for a magnificent array of fish, birds, plants and wildlife.

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Recommendation: Page 28, add a new paragraph and number it (8).
"While agency representatives who will implement the MNRRA plan may disagree among themselves over economic issues and the rate at which barge traffic will grow in the future, they must remain aware that the more obvious recreational and wildlife habitat assets of the corridor are the results of conditions created by the locks and dams. In turn, the locks and dams are in place as a result of expenditures which have been justified by the role of commercial river navigation in the national and international economy. Commercial navigation, and the consequential advantage to the people of the United States, is the primary justification for funding of the maintenance and operation of the navigable channel. There are many beneficiaries of this transportation system, including recreational opportunities and environmental habitat. The MNRRA Document must be implemented in a way which will not diminish the status of the Upper Mississippi River among commercial transportation systems supported by federal expenditures".

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RESPONSES

12. The MNRRA act states that the plan should "recognize existing economic activities within the area and provide for the management of such activities, including barge transportation and fleeting." The final plan does this and it is recognized that there might be some effects on the activity, but the plan is not expected to have significant adverse effects.

13. This is not a policy statement and therefore was not added as requested.

14 **4. The Document does not recognize the "environmental friendly" nature of commercial navigation.**

"Environmental Impacts of a Modal Shift", prepared by the Minnesota Department of Transportation's Ports and Waterways Section, dated January, 1991 discusses the environmental impact of shifting to truck or rail, specific commodities currently moving in four transportation segments of the MNRRA corridor via barge.

Examples. Page 13 of this report arrives at the following conclusion:

"...this study's results show that a modal shift in four transportation corridors would result in annual increases in:

**Fuel use of 826% from 455,274 to 4,218,250 gallons,*
**Exhaust emission of 709% from 80.9 tons to 654.8 tons,*
**Probable accidents of 5,967%, from .3 to 18.2,*
**Daily truck traffic increases of 1,333 vehicles in the corridors, and*
**The need to dispose of 2,746 truck tires each year.*

Two of the movements could possibly have rail service. If it were available there would still be increases in fuel use of 331%, in exhaust emissions of 470% and in accidents of 290% each year."

UMWA submits that to enhance the quality of the environment throughout the MNRRA corridor, rather than simply showing concern for the waterway and adjacent shoreline, the Document would have more credibility if it gave official recognition to environmental studies such as the one referenced above.

15 **Recommendation.**
1). This Document must not go forward until it includes a transportation environmental impact study and recognizes the environmental impacts of modal shifts as determined by *"Environmental Impacts of A Modal Shift", Minnesota Department of Transportation, Ports and Waterways Section, January, 1991.*

16 *2).* Under "Selected References" on pp. 243 and 244 of the Document, include: *"Environmental Impacts of A Modal Shift", Minnesota Department of Transportation, Ports and Waterways Section, January, 1991.*

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14. It is generally recognized that commercial navigation has less environmental impact than some other forms of transport. However, there are some aspects of the activity, such as resuspension of contaminated sediment, the potential for spills, dredging to maintain existing activities, and the long-term need to upgrade the navigation infrastructure, that all have impacts on the environment. Therefore, "environmentally friendly," is not an appropriate phrase to use in such a comprehensive management plan, as it implies no adverse impact or even mostly beneficial effects.

15. The plan does not propose a modal shift.

16. This reference was added.

COMMENTS

17 **5. Purchase of private land or interest in land is not clearly provided for.**

According to the Uniform Relocation Assistance and Real Property Acquisition Policies for Federal and Federally Assisted Programs Act, the head of the concerned Federal agency shall disregard the impact to valuation caused by the public improvement for which such property is being acquired. Currently, this Plan does not clearly state that these purchases will be made consistent with the Uniform Act.

Without a clear statement that purchases must be consistent with the Federal regulations, *NPS appraisers are free to value targeted property after the imposition of the "zoning guidelines".* The effect of this would be to reduce appraised property values and NPS easement acquisition costs.

Landowners fear and generally cannot afford a lengthy and costly legal process in order to be fully compensated for the value of any NPS-acquired lands or to prevent NPS from acquiring such lands.

Definition of "shoreline", critical to determining the starting point of the MNRRA corridor is not clearly defined.

Examples:
1). Page 11 of this Document, last vision, suggests that "Residents and visitors are able to traverse the **entire** (our emphasis) length of the corridor by foot and bicycle ."

2). Page 58 of this Document, para (8), second paragraph, states "Although the Mississippi National River and Recreation Area is much different than the older and more familiar park areas, such as Yellowstone or Gettysburg, it still has the NPS mandate to **preserve resources and provide for their enjoyment by the public** (emphasis ours).

3). Page 21 of this Document is a sketch of the water-side area of the corridor which defines "shoreline" as "Ordinary High Water Level". In Glossary of Terms, the description of "Ordinary High Water Level" is based on seasonal fluctuations in water level. UMWA finds this definition of "shoreline" ambiguous, changeable over time and unacceptable.

Recommendations.
1). To restrict NPS ability to purchase or otherwise obtain private residential easements within the corridor, Page 11, last vision should be changed as follows:

18 "Residents and visitors are able to traverse the public owned portion ~~entire length~~ of the corridor by foot and bicycle where practical."

19 2). Commercial and residential landowners within the MNRRA corridor have a vested *interest in the natural resources within their property and,* for the most part, have done an exemplary job of preserving them, not only to protect property valuation, but to pass them on to future owners. NPS should be allowed (by legislation, if necessary) to obtain ownership or easements from residential and commercial property owners only upon voluntary consent of such property owners.

20 In the event this Document allows for the acquisition of property, it should clearly state that such acquisitions are subject to the Federal policies of the Uniform Relocation Assistance and Real Property Acquisition Act.

RESPONSES

1.7. The draft plan discusses this issue. Additional clarifying language was added to the final plan. Also see response to comment B-1-9.

1.8. The proposed limitation to public land would be too restrictive and was not incorporated. Although there are some specific references to practicality, a general statement that the plan would be implemented in a practical manner is included in the beginning of the plan, and repeated references to it are not necessary.

1.9. Minimal NPS acquisition is envisioned.

2.0. Statements were added that assert that appropriate federal and state laws will apply.

21

3). "Shoreline" on page 21 of this document should be defined as "Normal flat pool". "Normal flat pool elevation is defined as that established elevation which exists when there is no free-flowing water into a pool from the upstream dam and no free-flowing water being discharged from the downstream dam".

September 10, 1993
Upper Mississippi Waterway Association

21. A statement was added stating that the plan uses the state definition for shoreline.

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3M General Offices

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St. Paul, MN 55144-1000
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3M

September 13, 1993

National Park Service
Ms. JoAnn Kyral, Superintendent
Mississippi National River and Recreation Area
175 E. Fifth Street, Suite 418
P.O. Box 41
St. Paul, MN 55101

Dear Superintendent Kyral:

As you are aware, 3M has closely followed the public activities surrounding the Mississippi National River and Recreation Area (MNRRA). We applaud the diligent work of the Mississippi River Coordinating Commission (MRCC) in their efforts to complete the development of a Comprehensive Management Plan (Plan) for the area. Our continuing goal is to provide expertise and input so as to assist the MRCC in achieving a work product that would be reflective of statutory mandates.

3M commends the MRCC for its labors, both as a group and individually, in moving the process to its current status, i.e. production of the June 1993 draft Plan and EIS. There is no question that this draft Plan, in many respects, is an improved product from the February 1993 preliminary draft Plan. 3M, however, continues to have several concerns associated with the draft Plan:

1) 3M has a strong concern for the environment. To continue to lead in corporate environmental stewardship, 3M must have clear understanding of which regulations and government agencies have the requisite authority. The draft Plan is inadequate in providing the guidance or assurance necessary to carry on vital business decision-making. Thus, instead of "coordinating and consolidating" as directed by the law, the draft Plan develops the National Park Service (NPS) as another layer of bureaucracy in a system where streamlining procedures and practices are currently being initiated. Various "Policies and Actions" listed on pages 40 and 41 create such a bureaucracy. Many of these duplicate or overlap the missions of other agencies, and are unacceptable.

1

2) The lack of an appropriate inventory of Economic Resources and the lack of reasonable detail about changes, if any, in the regulatory processes affecting investments, jobs and businesses, are substantial deficiencies in the Plan. Such deficiencies do not support sustainable development, and therefore jobs and investment in the area. These need to be developed prior to Plan approval.

2

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1. The MNRRA plan was revised to add some of the detail from the law and clarify the process. The final plan makes a commitment to use existing review processes, do reviews concurrently with others, and expedite the process to the maximum extent practical.

2. The document does include considerable data and analyses on economic resources and impacts. These are pointed out in the final environmental impact statement. Some additional general economic data were added. A larger economic inventory and analysis was beyond the scope of the plan and would have added considerable time and costs to the project.

3) 3M operates a significant multi-product facility within the river corridor at Cottage Grove. This facility has distinguished itself by developing employment opportunities while simultaneously continuing reductions in environmental impacts. These results have been possible because of 3M's ability to continually evolve new product formulations as well as environmental treatment technologies at this site. For example, one of these on-site developments was a replacement product formulation for chloroflurocarbons (CFC's). If the NPS includes itself as regulators of materials, these new materials will neither be developed nor produced here. 3

4) Under the vague wording of the current draft Plan, it appears that 3M's goal to achieve 90% reduction of all waste generated in our operations by the year 2000 A.D. could be hampered by new NPS-driven and unique permitting procedures, environmental regulations, and variance requirements. We are concerned that 3M may find it extremely difficult to add on to existing facilities or even change production processes involving the use of new materials, many of which are the key to environmentally sound overall waste reduction. Uncertainty in the process could be substantially reduced by a clear written definition of NPS' role, using real or realistic examples. 4

5) The current draft Plan does not meet the needs of the National Environmental Policy Act (NEPA). Alternatives to the proposed plan are not described in sufficient detail, nor does the draft EIS indicate those alternatives that were considered but rejected. The description of the affected environment does not contain sufficient detail, for example, with respect to socioeconomic resources. 5

6) 3M supports the issues and background materials submitted by the Stakeholders' Coalition. This diverse group, comprised of industry, local cities, chambers of commerce, and labor, raised three main concerns:
First, the draft Plan does not meet the requirements of Public Law 100-696.
Second, the draft Plan fails to provide for the preservation, protection and enhancement of economic resources.
Third, the draft Plan goes far beyond the intent and history of the law.
We urge the Commission to review the Stakeholders' document and to adopt the suggestions recommended by them.

7) 3M strongly endorses the February 17, 1993 comments and amendments submitted by Commissioners Weaver, Nee, Schulstad, Lambert and Thune. These need to be included, to the extent not yet incorporated in the Plan.

We appreciate the opportunity to comment on the draft Plan and fully intend to continue working diligently with the MRCC in achieving a final Plan that is consistent with the statutory mandates.

Sincerely,

Charles E. Kiester

Charles E. Kiester
Senior Vice President

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3. The National Park Service would not be a new regulator of materials in the corridor but rather would support efforts by the Minnesota Pollution Control Agency and others to reduce the use of hazardous materials and eliminate the adverse impacts of hazardous materials. The National Park Service would use its review authority to encourage compatibility with the policies in the plan but would not have regulatory functions in the corridor (except on land owned by NPS.)

4. The plan was revised to clarify the NPS role in pollution control and other areas.

5. The National Park Service believes that the environmental impact statement adequately describes the alternatives, cumulative impacts, indirect effects, the affected environment, and mitigating measures. Department of the Interior and NEPA guidelines allow mitigating measures to be integrated into the text of the proposed action and alternatives or the environmental consequences, and it is not necessary to isolate them in the table of contents (516 DM 4.10B; NPS-12 4-1E&G). Alternatives considered but rejected were identified on page 10 in the draft plan but are highlighted with a separate subheading in the final plan. Specific details were added to the document in the proposed plan in response to other public review comments.

CF Industries, Inc.

PUBLIC AFFAIRS OFFICE
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September 10, 1993

Ms. JoAnn M. Kyral
Superintendent
Mississippi National River and Recreation Area
U.S. National Park Service
175 East Fifth Street
Suite 418
Box 41
St. Paul, MN 55101

RE: Draft Comprehensive Management Plan

Dear Superintendent Kyral:

CF Industries, Inc. is pleased to have the opportunity to share our views on the "Draft Comprehensive Management Plan for the Mississippi National River and Recreation Area (MNRRA)."

SUMMARY POSITION

CF Industries, Inc. is concerned that the proposal does not allow adequate flexibility for increases in barge/rail access in the event of greater demand, response to price conditions affecting commodity industries or in reaction to natural disasters. We believe that the plan, as drafted, would result in excessive restrictions on the use of our private property, including our undeveloped acreage. The Plan needs to specify criteria for determining values of private property acquired for MNRRA projects. Finally, CF believes that the Plan pays inadequate attention to the economic consequences of its proposals. The Plan's economic impact analysis must be strengthened dramatically before the Plan is adopted, not after the Plan is finalized, as is currently proposed by the Commission.

INTEREST OF CF INDUSTRIES, INC.

CF Industries, Inc - North America's Leading Producer and Distributor of Agricultural Fertilizers.

CF Industries, Inc. (CF) is an interregional farm supply cooperative owned by 12 regional cooperatives in the U.S. and Canada. Through its member companies, CF's nitrogen, phosphate and potash fertilizer products reach over one million farmers and ranchers in 46 states and two Canadian provinces.



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CF manufacturing plants have the capacity to produce more than 8 million tons of nitrogen and phosphate fertilizer products annually. The Company's manufacturing plants include nitrogen complexes in Donaldsonville, Louisiana, and Medicine Hat, Alberta, Canada as well as extensive phosphate mining and manufacturing facilities in Florida.

CF operates the most extensive distribution system for fertilizer products in North America, including ownership or lease positions in trucking, shipping, barging and regional terminals and warehouses. CF owns or leases approximately 60 regional terminals and warehouses. Total storage capacity is in excess of 2.4 million tons of product.

CF's Pine Bend Terminal and Warehouse

CF's Pine Bend terminal and warehouse in Rosemount, Minnesota, are located inside the designated MNRRA corridor. CF's Pine Bend facility is a critical component of the Company's distribution system. In 1992, over 780,000 tons of CF products were shipped through the Pine Bend terminal and warehouse for distribution to CF member companies. The majority of the product, approximately 75 percent or 585,000 tons, was shipped via barge up the Mississippi River from our Florida and Donaldsonville, Louisiana manufacturing facilities.

The CF Pine Bend warehouse is the largest dry product warehouse in CF Industries' distribution system. The warehouse has the capacity to store 200,000 tons of dry fertilizers in four buildings. Two barge unloading facilities equipped with mechanical boom cranes are capable of unloading a total of 800 tons per hour of dry fertilizers. Three rail car unloading stations are located at the facility, two with a capacity of unloading 300 tons per hour and one with a capacity of unloading 200 tons per hour. Five outbound stations are located at the warehouse which are capable of loading either trucks or rail cars. The five stations have a loading rate of approximately 1,200 tons per hour. During the fertilizer season, 350 to 400 trucks are loaded during the day and 30 to 40 rail cars are loaded at night for shipment to CF members. In 1992, CF shipped 682,369 tons of product through the Pine Bend warehouse.

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Sitting next to the warehouse, the Pine Bend terminal provides storage for up to 85,000 tons of liquid fertilizers. The terminal has two 30,000 ton capacity anhydrous ammonia tanks and one 25,000 ton UAN tank. In 1992, 100 percent of the UAN, approximately 24,007 tons, was received at the terminal via barge. Thirty four percent of the ammonia or 25,830 tons, was received by barge in 1992. At the Pine Bend terminal, there is one barge pier with facilities capable of receiving three barge tows carrying 8,400 tons in about 18 hours at a rate of 470 tons per hour. Eight anhydrous ammonia truck loading stations can be used to load trucks at a rate of 6,000 tons per day. Two UAN truck loading stations can load six trucks per hour.

Factors Affecting CF Utilization of the Mississippi River

CF relies heavily on the river segment which begins around Hastings, Minnesota and extends Northward (the "Northern Upper Miss") in supplying its markets. For example, during the twelve month period ending June 30, 1993, the Company shipped 16 percent of its total sales to its farmer-owners utilizing the Northern Upper Miss. The present outlook for Fertilizer Year 1994 is that approximately 18 percent

of the Company's sales will be shipped using this river segment. CF is forecasting increased throughput for the facility over the next several years. Regulatory actions that result in a constraint in the utilization of the Northern Upper Miss would seriously impair CF's ability to deliver its products to its customer-owners in a cost efficient manner.

An artificial constraint that affects river usage, could seriously impair CF's inability to quickly and efficiently respond to changes in the volatile fertilizer marketplace. The fertilizer industry is known for its unpredictable business cycles. These cycles can be caused by a number of factors, many of which are outside CF's control, and which greatly affect demand for the Company's products. For example:

- Weather conditions may affect the ability and economics of fertilizer applications and may influence the quantity and form of fertilizer which is applied by the farmer.

- Global demand for grain, itself a function of economic and political conditions in the world, greatly influences U.S. grain prices and ultimately affects farmers' planting and fertilizer decisions.

- Global and domestic policies in such areas as energy, agriculture, trade and the environment exert a strong influence in the grain and fertilizer markets and can suddenly affect planting decisions.

In addition to the volatility inherent in the fertilizer marketplace, CF must contend with a number of complications, some of which are unique to this river segment. These include:

- long transit times to traverse the river, requiring significant advance planning effort. For instance, under ideal conditions, the time to deliver phosphates from a Florida manufacturing facility to the Pine Bend warehouse is between 30 and 35 days.

- normal wintertime ice conditions that cause this river segment to be available for only eight months out of the year. A great deal of coordination and planning is required to maximize utilization of CF assets in the marketplace given this constraint.

- extreme weather cycles which further reduce the availability of the river to commercial navigation. The recent flood is one example. As recently as 1988, drought conditions also severely limited use of the river system.

Specific Comments on the Draft Comprehensive Management Plan for the Mississippi National River and Recreation Area

CF submits the following comments and recommendations on specific provisions in the Draft Plan and Alternative B. The comments are listed in order of priority to CF.

COMMENTS

RESPONSES

1. COMMERCIAL NAVIGATION

- p. 34 - "Barge operations comprise about 1% of the metropolitan area's economy."

CF supports additional study of the barge industry and its impact on the metropolitan area's economy as proposed in the Plan on p. 47. The Plan relies heavily on information gleaned from a study by Temple, Barker & Sloane which "used 1984 as the base year for analysis of commercial navigation activity." (p. 137) While the Plan makes two references to more recent studies, Fruin 1992 and Corps of Engineers 1992, the conclusions in the Plan are reached using

1 outdated information from the Temple, Barker & Sloane study. CF recommends that the proposed study of barge operations be completed before the plan is finalized. Industry should have the opportunity to participate in the study and provide comments on the study as it is developed. It is clear that the potential impact of the Plan on barge operations has not been adequately studied.

- p. 37 - "Decisions about (barge) activity expansion would be based on a balance between desired area resource characteristics and river system capacity."

2 CF recommends that the Commission identify "area resource characteristics" and define "river system capacity." CF believes the industry should assist the Commission or, at a minimum, provide comments on determination of "river system capacity."

- p. 37 - "Decisions about commercial navigation uses would be based on resource values, emphasizing minimal impact on aquatic life."

3 CF requests that the Commission define "resource values" and "minimal impact on aquatic life." If it is determined that aquatic life is impaired, CF recommends that the Commission specify the actions they plan to take to address the situation. CF is very concerned that the plan will result in restrictive use of the river by barges.

Proposed Policies and Actions:

- p. 37 - "Evaluate management alternatives to expanding existing areas or creating additional commercial fleeting areas."

4 CF requests that industry participate in the identification and evaluation of management alternatives and have the opportunity to provide comments to the Commission before final decisions are made.

- p. 37 - "Evaluate the potential for bank erosion caused by towboat wakes before making decisions to locate new (or relocate existing) barge fleeting areas."

5 CF recognizes that towboats as well as recreational boats create wakes. CF recommends that the Commission evaluate the potential for bank erosion from wakes created by towboats and recreational boats operating in the area. In addition, CF recommends that industry be given the

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1. This is beyond the scope of the MNRRA comprehensive management plan. The final plan has been revised to include a proposal for a follow-up surface water use management plan.

2. The sentence was revised per other comments. River system capacity would be addressed in the follow-up surface water use plan. Public involvement will be part of this plan.

3. The sentence was revised per other comments. Resource values are defined in the glossary. Minimal impact on aquatic life is no longer specified in the policy because impacts were generalized to include consideration of all resources listed in the MNRRA act.

4. Public participation will continue during preparation of follow-up plans, including the surface water use plan.

5. The policy was revised and includes consideration of recreational boat wakes.

COMMENTS

opportunity to participate in bank erosion studies and provide comments on potential actions to resolve the erosion problems.

- p. 38 - "Evaluate potential noise and visual impacts before making decisions to expand or locate barge operations."

6 CF requests that the Commission identify how they will measure the noise and visual impacts of barge operations; what noise and visual thresholds will be used for making decisions on barge locations; and, how these thresholds will be determined. CF recommends that industry have the opportunity to participate in the noise and visual evaluation and provide comments before a determination is made on barge locations.

- p. 38 - "Barges must not present an impediment to navigation (either commercial or recreational) and must not damage the integrity of the river."

7 CF recommends that the Commission clearly identify what measures will be used to determine if the "integrity of the river" has been damaged and allow for public comment before any final decisions are made that would limit barge use of the river.

2. ENVIRONMENTAL CONCERNS - RESOURCES MANAGEMENT

- p. 39 - "Following completion of this comprehensive management plan, the NPS would work with other partners having a major interest in resource management in the corridor to prepare a more detailed resources management plan (RMP) for the area. The resources management plan is an implementation plan prepared to detail research needs and proposals for managing resources in the corridor."

8 CF requests that the Commission identify the "other partners having a major interest in the resource management of the corridor" and recommends that industry representatives be included in the group. CF recommends that the Commission include provisions that require public input on the resource management plan as it is being developed and before it is finalized.

National Resource Management - Pollution:

- p. 39 - "This plan encourages an emphasis on air and water pollution prevention and increased efforts for control and cleanup where necessary to address existing problems..."

9 CF requests additional information on the specific pollution prevention requirements the Commission and NPS envision for the corridor.

- p. 39 - "Pollution prevention policies should focus on nonpoint sources because of the relatively greater impact it now has on the river."

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RESPONSES

6. This is beyond the scope of the plan and will be addressed in follow-up work.

7. This is beyond the scope of the plan. The final plan emphasizes the need for public involvement in plan implementation.

8. Public involvement would continue during CMP implementation.

9. This is beyond the scope of the plan and will be addressed in follow-up work by the Minnesota Pollution Control Agency and others.

10 CF recommends that the Commission and NPS review and monitor existing federal programs designed to address nonpoint source pollution. The federal programs are presented on pages 6 and 7 of this document.

- p. 39 - "Increased monitoring and enforcement would be provided by agencies currently responsible for managing air and water quality in the corridor."

CF supports the involvement of agencies currently responsible for managing air and water quality.

National Resource Management - Proposed Policies and Actions:

- p. 40 - "(1)....provide incentives for reducing air and water pollution and exceeding federal and state standards. Efforts would be made to prevent new sources of pollution... (4) Ensure strict enforcement of existing pollution control regulations. Increase cooperative ventures with industry to prevent or minimize pollution at the source through incentives and voluntary standards. (5) Encourage pollution prevention and increased pollution control in selected areas to protect sensitive resources in the corridor."

11 The CF Pine Bend facility will face significantly increased pressure on the environmental regulation front, especially since portions of our land are likely to be considered "sensitive natural resources." Efforts to prevent new sources of pollution could seriously limit facility modifications, expansions and new development at Pine Bend. Pollution prevention and source reduction, while voluntary at this time, could lead to NPS and Commission involvement in CF's Pine Bend day-to-day operations with little regard to the potential economic impact of such measures.

- p. 40 and 41 - "(6) Reduce the use of chemicals for fertilizer and pest control in agricultural and residential areas, which would support sustainable land treatment activities and integrated pest management practices. (14) Encourage alternatives to grass lawns in the shoreline area to reduce fertilizer and pesticide runoff into the river."

12 CF recommends that the NPS monitor implementation of existing programs addressing nonpoint source pollution before establishing additional programs. Currently, there are a number of federal programs in place addressing water quality and runoff from agricultural practices. For example:

- **Water Quality Incentive Program** - Initiated when Congress passed the 1990 Farm Bill, the goal of the program is to achieve source reduction of agricultural pollutants by implementing management practices in an environmentally and economically sound manner on 10 million acres of farmland by the end of 1995.
- **Conservation Environmental Easement Program** - Another program established under the 1990 Farm Bill, the CEEP is designed to provide long-term protection of environmentally sensitive land or reduction in the degradation of water quality on farms through permanent easements.

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10. The National Park Service and the commission would monitor the effectiveness of existing programs that address nonpoint source pollution.

11. Efforts to protect sensitive natural resources would be led by state and local governments under existing state law and existing (or possibly updated) critical area plans and ordinances. Where latitude is allowed under state law, the plan supports voluntary efforts, and economic effects are normally considered in the decision-making process. The plan encourages somewhat greater emphasis than may have been given before the area was established as a unit of the national park system, but it recognizes that many factors, including impacts on economic resources, must be considered in the process.

12. The plan does not advocate the establishment of new programs, as envisioned by the comment, but rather the effective implementation of existing programs, with some added emphasis and coordination to ensure protection of resources identified in the MNRRA act. The National Park Service and the commission would monitor the effectiveness of existing programs that address nonpoint source pollution.

- **Integrated Farm Management Program Option** - As part of the 1990 Farm Bill, Congress authorized this program to add planting flexibility and encourage farmers to adopt resource conserving crop rotations to help prevent soil erosion and protect water quality. The enrollment goal is five million acres.
- **Rural Clean Water Program** - Offers financial and technical assistance to farmers in 21 selected U.S. areas where Best Management Practices are needed that specifically target significant agricultural-related water pollution and water quality problems.

In addition, the U.S. Congress is debating legislation to reauthorize the Clean Water Act which includes a number of new provisions intended to address nonpoint source pollution.

13

- p. 40 - "(7) Seek cleanup of corridor lands that are adversely affecting or may adversely affect the river environment."

This statement is vaguely written and grants the Commission and NPS broad authority to require landowners to implement costly measures for land that "may" adversely affect the river environment. CF recommends that the Commission clarify the phrases "adversely affecting" or "may adversely affect" by referring to existing federal and state standards and regulations for water and air quality.

- p. 41 - "(17) Ask watershed management organizations to establish ongoing water quality monitoring programs to determine the types, loadings, and sources of pollutants being discharged to the river from each tributary, and develop programs to prevent and control these pollutants as part of their revised plans."

CF recommends that the watershed organizations review existing programs at the state and federal level designed to address point source pollution and runoff from agricultural operations before establishing additional programs with similar goals. CF is committed to complying with all applicable environmental laws, rules and regulations.

14

- p. 41 - "(20) Review federal regional air quality permits to assist in preventing further deterioration of the corridor's air quality from pollution sources inside and outside the MNRRA boundaries."

The CF Pine Bend facility has a permit, required under the Clean Air Act, for emissions from conveyor belts, flares and storage tank heaters. CF's permit would be reviewed under this proposed policy.

15

p. 43 - Map of Sensitive Natural Areas - "Wetlands, floodplains or slopes exceeding 12%."

CF recommends that the Commission and NPS clearly identify sensitive natural areas by citing the specific locations. Currently, the Plan only provides a map of sensitive natural areas. It is difficult to ascertain from the map if CF land or portions of it, would be considered a sensitive natural area. CF Pine Bend personnel believe portions of our land may be considered "sensitive" because of wetlands and a bluff slope on CF undeveloped land that exceeds 12%.

13. This statement is simply a goal to clean up polluted sites. It does not grant the National Park Service authority to require private landowners to clean up their land. Existing federal and state standards and regulations are the authorities that would be used to accomplish pollution reduction policies identified in the plan. It is hoped that additional cleanup could be accomplished through incentives and voluntary efforts.

14. Only new permit applications and renewals would be reviewed, not existing permits.

15. This recommendation is not possible at the scale of this plan for the entire 72-mile corridor. However, as local communities prepare or update their plans, they can identify these sensitive areas in their plans. Also, developers are typically required to provide this kind of site information in their permit applications.

Economic Resource Management and Research Needs:

- p. 47 and 48 - "Existing economic resources in the corridor should be more intensively inventoried and evaluated. The NPS would encourage and facilitate this research, which would be carried out primarily by others. A more thorough inventory is needed following plan approval to assist in plan implementation. The inventory should be preceded by more analysis (based on legislative history), agreement on the definition of economic resource, and a comprehensive identification of what should be included in the inventory...There is a need for new forecasts and analyses of barge traffic trends by commodity and by terminal. Along with additional analyses and a comparison of barge transportation costs with competing modes, an assessment should be made of the long-term effectiveness of barge transportation and its impact on regional commodity producers and consumers. Previous barge fleeting requirements analyses and studies on the direct, indirect, and induced economic impacts of commercial navigation should be updated."

16 CF supports additional study of the economic resources and questions why such action has not been taken to date. CF strongly recommends that the Commission and NPS identify who will be conducting the study and allow public input throughout the study. CF is concerned that potential limits proposed in the plan on barge traffic, modifications to existing facilities and new development will be imposed without a thorough economic study. CF opposes adoption of the Plan before a full economic analysis is completed.

Visitor Use Resource Management - Proposed Policies and Actions:

- p. 51 - "(5) Encourage water surface-use regulations such as no-wake zones on the main channel and in backwater areas to protect selected shorelands from erosion and reduce conflicts among recreational activities on the river while not significantly affecting the existing commercial navigation industry."

17 CF requests that the Commission clarify the phrase "not significantly affecting the existing commercial navigation industry" and identify the shorelands that could be subject to no-wake zones. CF recommends that industry have the opportunity to provide comments on proposed no-wake zone before they are established. CF is concerned that imposing no-wake zones could slow traffic down and decrease barge tows, resulting in increased transportation costs for CF and ultimately the farmer owner.

Plan Implementation - Proposal for Consistency, Coordination and Streamlining:

- p. 80 - "The following recommendations define responsibilities for improvements in coordination and consistency: streamlining of permits and regulations - a temporary task force.

18 CF recommends that the Commission and NPS identify members on the task force and suggests that industry be at least one of the members. CF also recommends that the Commission and NPS note that public comments will be sought on the permit streamlining plan development and

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16. See response to comment G-46-3.

17. It is beyond the scope of the comprehensive management plan to identify specific no-wake zones. This issue would be addressed in follow-up planning. Legal designation of no-wake zones would be done by corridor cities or counties.

18. This is beyond the scope of the plan. The final document has been revised to emphasize that public involvement would continue during plan implementation.

draft before it is finalized. CF suggests that the Commission and NPS issue a schedule for development of the permit plan that includes a firm deadline for completion.

3. LAND AND WATER USE

General Concepts

- p. 17 - "The most significant visual resources would be protected and restored where practical, including historic structures and landscapes, shorelines, wetlands, steep slopes, and other sensitive resources."

19 CF recommends that the Commission and National Park Service (NPS) specifically identify all "significant visual resources" in the corridor and clearly specify what actions will be required to "restore" resources. CF changed the landscaping at the Pine Bend facility, so the shoreline and slope leading to the warehouses may be required to be restored. This may not be a serious problem for CF if NPS does not prescribe the vegetation that must be planted. (i.e. p. 9 - "Indigenous vegetation along the shoreline, in wetlands and along the bluffs is important to the visual character of the corridor and support of natural systems. Unrestricted development can strip vegetation if established regulations and guidelines are not followed."). The developed shoreline at the CF Pine Bend facility has been cleared for the dock, conveyor belts, conveyor belt loaders (hoppers) and dock shack. The slope leading to the warehouses also has been cleared for the conveyor belts.

20 The CF Pine Bend site also includes a wetlands area which will likely be subject to "protection' under the MNRRA plan. CF currently complies with all state and federal regulations pertaining to wetlands. However, CF has a permit for a dredged material site which is located adjacent to the wetlands area on the shoreline. It is unclear from this provision whether or not this site will continue to be allowed to operate. The permit for the site is issued by the Minnesota Department of Natural Resources. The Corps of Engineers placed dredged material at our site many years ago. In addition, CF recently employed a contractor to dredge the channel in front of our unloading dock and placed the dredged material at the CF site. CF is not required to test the sediment for contamination and has not conducted a test.

Planning Assumptions:

- p. 18 - "Land and Water Use - Development compatible with resource protection can take place in the corridor using vegetative screening or excellence in building design."

21 CF requests that the Commission and NPS define "vegetative screening" and "excellence in building design" in the MNRRA plan. CF is concerned that the provisions could limit modifications to existing facilities. In addition, CF may encounter serious obstacles to expansion on currently owned, undeveloped land, or new development on new land in the corridor.

19. This is beyond the scope of the comprehensive plan. The plan is primarily aimed at new development and emphasizes an incentives approach, especially for restoration activities.

20. This is a site-specific issue. See responses to comments G-17-9 and G-22-1.

21. This is beyond the scope of the comprehensive management plan. More detailed interpretation of planning concepts would be developed in follow-up work with the Metropolitan Council, Department of Natural Resources, and in individual community plans and ordinances.

- p. 19 - "Eminent domain should only be used as a last resort to protect corridor resources as specified in the MNRRA legislation after a Secretarial finding of noncompliance with the plan and all other procedures specified in the Act have been exhausted."

22 CF questions how the eminent domain authority will be used in cases of "open space." Will private landowners, who do not allow currently undeveloped land to continue as open space, face eminent domain actions by NPS? The CF Pine Bend facility consists of 369 acres of which approximately 225 acres are undeveloped. CF recommends that the Commission include more specific procedures with regard to eminent domain.

General Land and Water Resource Protection Concept:

- p. 19 - "Except in existing commercial and industrial developments, downtown areas, and historic districts, the riverfront and bluff area would appear mostly natural from the river and its shoreline areas (as observed from the opposite bank)...Where the natural appearance has been altered in other areas, design guidelines and rehabilitation programs would be established to encourage shoreline restoration to a more natural appearance."

23 The two statements appear to be contradictory. CF recommends that the MNRRA Commission and the NPS clarify the term "in other areas." It is not clear if existing commercial and industrial development would be required to restore their shoreline to a more natural appearance. In addition, CF believes "a more natural appearance" is vague and suggests that the Commission identify procedures that would be required. CF may be required to improve the view from the river by planting trees to cover up conveyor belts moving up the bluff and the warehouses located beyond the bluff.

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- p. 20 - "Nothing in this plan would deprive corridor landowners of all use and enjoyment of their land."

24 CF does not believe the proposed plan will allow the company "all use" of our owned land, especially when it comes to potential modification or expansion of existing facilities or development of new facilities on currently owned land.

CF is concerned that the flexibility necessary to run our operations will be significantly hindered as a result of the proposed development preservation guidelines in the Plan. For example, in the "bluff preservation area," CF is considering clearing an area for a rail car cleaning facility, but it is unclear if such a facility could be constructed under the proposed Plan. In addition, CF may encounter restrictions on reconfiguring the conveyor belts used to move product up the slope or may be required to establish natural landscaping to cover the conveyor belts and warehouses when viewed from the river. CF has 225 acres of undeveloped land and is concerned that "all use" of this property will not be allowed due to the "open space" policies proposed in this plan. CF recommends the Plan be specific on the use of undeveloped land or "open space."

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22. The policy for NPS land acquisition in the plan states that NPS "eminent domain should only be used as a last resort to protect corridor resources as specified in the MNRRA legislation after a secretarial finding of noncompliance with the plan and all other procedures in the act have been exhausted." The pertinent language in the legislation regarding eminent domain is repeated in the plan. Park land acquisition and trail development will be the responsibility of local government. The National Park Service does not intend to use condemnation for these purposes. The final plan further clarifies this issue.

23. "In other areas" means outside existing downtowns and historic districts. The plan was revised to clarify this. The MNRRA plan encourages but does not require these improvements.

24. There was some confusion on the meaning of this statement in the draft plan. In fact, some reviewers read the opposite of what was intended. State and U.S. Supreme Court decisions have generally held that a taking occurs only when a parcel of land is regulated to the point where there is no reasonable use available to the landowner. In other words, the land use regulation does not have to permit the highest and best use or the most profitable use, but only reasonable use. To have a taking, regulation would normally have to be so extreme as to allow the landowner absolutely no viable use. The courts have held that even uses that generate lower levels of income can be legally mandated by an ordinance. The MNRRA plan was clarified to include this explanation. Also, because the proposal for state legislation mandating conformance with the plan was removed, it is highly unlikely that this plan could be construed to initiate a taking.

COMMENTS

Land Use and Protection Policies:

- p. 20 - "Although economic development activity (promotion of new business and development) for the area is an important element of community growth and development strategies, it is not a major component of this plan and would continue to be the function of local plans and programs in the area. This plan does encourage growth and redevelopment in the corridor that protects the nationally significant resources listed in the MNRRA act and enhances the appearance and livability of the river environs."

25 CF is very concerned that the MNRRA Commission and NPS have not made economic development activity a "major component of this plan." The Commission proposes to conduct a more thorough economic analysis after the plan is passed. CF opposes this approach and recommends that the Commission thoroughly study the possible economic impact of the plan before it is finalized.

It is not clear if resources currently owned by CF would be considered a "nationally significant resource" under the proposed plan. The legislation establishing the River Area does not specifically list the "nationally significant resources" and CF recommends that the Commission and NPS provide such a list before finalization of this plan.

CF also requests that the Commission and NPS clarify the terms "enhances appearance and livability of the river environs." Specific requirements are necessary for industry and business to more fully understand the potential impact this plan could have on modification or expansion of existing facilities or development of new facilities.

- p. 20 - "Land use location decisions for development proposals would be based on a balance between resource protection, visitor use, and development needs in the corridor. Resource protection (including existing natural, cultural, and economic resources) would be the primary determining factor in case of a conflict. Currently undeveloped land areas in the corridor would continue to appear open from the river and its shoreline areas (as observed from the opposite bank), although there could be intensive development away from the shoreline. New developments would in most cases be clustered near similar developments in the most appropriate places in the corridor and would be consistent with local plans."

26 CF is concerned that the potential economic benefits of new development does not receive adequate attention under the proposed plan. CF recommends that the potential economic benefits be considered as well as resource protection when there are conflicts with land use decisions.

27 CF suggests that the Commission and NPS clearly identify and prioritize resources in the River Corridor subject to protection in case of a conflict.

28 CF is concerned with the proposal for "currently undeveloped land areas" to appear open from the river. CF may encounter stringent limitations on the future use of our undeveloped land as a result of this provision. In addition, the plan allows for new development most likely "clustered near similar developments." CF's undeveloped land is adjacent to a park and there is a potential that the provision also will prevent CF from developing this land in the future.

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RESPONSES

25. The MNRRA legislation directs that the natural, cultural, and economic resources be protected and enhanced in the corridor. Economic development activity as defined in the glossary (to promote new business and job growth), is encouraged where it takes advantage of the corridor's attributes and does not degrade natural and cultural resources. Local governments and private sector business development organizations would continue to have the lead role in economic development activity.

26. See response to comment B-7-25.

27. This is beyond the scope of the plan.

28. The text was revised to say that an open appearance could be maintained through setbacks and screening, which would allow new developments in many areas of the corridor.

- p. 23 - "New land use and development in the riverfront area (the first 300 feet back from the river) would include those activities relating to or requiring a location next to the river, activities preserving historic structures located along the river, or activities enhancing the river front.

29 This statement reinforces CF's concern that the plan will not allow current landowners "all use" of their land as stated on page 20 of the Plan. CF may face restrictions if the Company chooses to expand on the undeveloped land at Pine Bend.

- p. 23 - "(3) Resource protection and site development policies would result in increased protection of wetlands....."

30 CF recommends that the Commission and NPS identify the new requirements that must be complied with as a result of their efforts to "increase protection" of wetlands. CF's land parcel at Pine Bend includes an area designated as a wetland. CF complies with all existing local, state and federal regulations governing wetlands.

- p. 24 - "New development would occur in accordance with building setbacks and landscaping guidelines and would include trail easements and other site stipulations identified by local governments."

31 This statement reinforces CF's concern that existing landowners will not have "all use" of their land. CF recommends that the Commission and NPS identify the "landscaping guidelines," particularly if specific vegetation is required, and "other site stipulations" for new developments in the plan before it is finalized and allow the public to comment on the specific requirements.

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Location Policies:

- p. 24 - "(1) All new development in the riverfront area (defined as the first 300 feet back from the river's ordinary high-water level) should have a relationship to the river, a need for a river location, or the capability to enhance the river environment."

CF supports this provision, but recognizes that the new development must meet other requirements specified in the plan: "landscape design; building setbacks; natural, cultural, and economic resource protection needs" (p. 18); "vegetative screening or excellence in building design" (p. 18); "trail easements and other site stipulations identified by local governments." (p. 24).

- p. 24 - "(1) Following are examples of the types of uses that would be acceptable along the riverfront: industry that requires the river for its function, such as those with commercial navigation or water appropriation needs."

CF supports this provision.

29. Without details on an expansion proposal it is hard to predict what the effect of the MNRRA plan might be. Some restrictions could apply but would be subject to local control.

30. The plan emphasizes better implementation of existing requirements, not new requirements.

31. This sentence was deleted from the plan. Sample site development guidelines are included in appendix C. Local governments would develop landscaping guidelines for their community.

COMMENTS

- p. 26 - "(3) and (6) If the land meets criteria for open space acquisition, encourage owners to leave the space open; otherwise appropriate private redevelopment should occur. Encourage a greater variety of land use activities with additional open space in the lower river corridor (below the I-494 bridge at the city of South St. Paul)."

32 The CF Pine Bend facility is located below the I-494 bridge. This statement reinforces CF's concern about restrictions the plan could place on undeveloped land owned by the company at Pine Bend.

Site Development Policies:

- p. 26 and 27 - Specific site development requirements are presented in this section as well as Appendix C.

33 This section presents the restrictions on new development in the corridor and modification or expansion of existing facilities. CF recommends that the Commission clearly identify the sensitive resources which will be protected under the plan. Note that the Pine Bend facility is located in the Critical Area Program.

Variance Policies:

- p. 29 - "The variance procedures would be in accordance with state statutes and would include the following criterion: the variance would not adversely affect significant resources in the corridor; the property owner would not have reasonable use of land without the variance; the variance request is not based solely on economic considerations; and, the variance request would not have adverse impacts to the surrounding properties."

34 CF supports establishment of variance policies, but is concerned that the measure as currently drafted is too broad. CF recommends that the Commission and NPS assure opportunity for public input on variance proceedings and requests.

Open Space and Trails; Land Acquisition Concepts:

- p. 30 - "The (Plan) does not show proposed land acquisition, but only potential open space opportunities. The actual amount of open space would probably be considerably less..."

35 CF needs clarification as to whether our undeveloped land is an "open space opportunity" under the proposed Plan.

- p. 33 - "Open space would include public and private lands that remain primarily undeveloped. They may include lands devoted to active or passive recreational use or lands retained for visual or natural resource protection purposes. A continuous trail system using available corridors such as nearby streets and utility easements is an important component of this plan. The potential for open space is greatest in the lower river area (below the I-494 bridge)."

RESPONSES

32. Please see the revised concepts and policies. The plan encourages more open space in the corridor, especially within the floodplain or 300 feet of the river, but does not mandate it.

33. This is beyond the scope of the plan and will be identified in follow-up critical area planning by communities or in project-specific site plan applications by developers.

34. The text was revised to encourage public input in variance proceedings. Variance proceedings will be in accord with state law.

35. It is a concept map showing potential lands only. Specific proposals would be developed in follow-up work, and local governments would have the lead in acquiring additional park land.

36 The CF Pine Bend facility is located below the I-494 bridge and it is unclear as to whether a portion of our undeveloped land is included in the open space plan. In addition, the proposed trail runs along Highway 55 south of CF property. However, if the trail were moved away from the highway for safety reasons, CF is concerned that we might be required to provide an easement or a "buffer zone" along the trail. CF needs to be provided with clarification on these points.

ALTERNATIVE B

Land Resource Protection Concept:

- p. 94 - "In the event of conflicts between resource management goals, natural and cultural resource preservation would be given preference."

37 CF believes the potential economic impact of decisions must be given consideration in cases of conflicts and opposes this provision. As mentioned previously, we believe a thorough economic impact study should be completed before finalization of the Plan.

- p. 94 - "Further degradation or alteration of these (sensitive) features would be strongly discouraged"

38 CF recommends that the Commission and NPS identify "sensitive features."

Land Use Protection Policies:

- p. 94, 99 - "There would be a more extensive land acquisition program than in any other alternative; the NPS would work with other agencies to develop a detailed land acquisition plan."

39 CF questions whether the land acquisition program would include private lands. CF supports development of a detailed land acquisition plan and requests that we have the opportunity to participate and provide comments on development and finalization of such a plan.

- p. 95 - "No river dependent uses would be developed in conjunction with open areas or in isolated or unrelated sites, and none would impair public access to or views of the river."

40 CF is concerned this provision could seriously restrict our ability to build on currently undeveloped land at the Pine Bend facility and would limit our flexibility to serve our member-owners. CF recommends this provision be deleted.

Open Space and Trails Concepts:

- p. 95 - "More extensive open space and trail development would be provided in this alternative than in the proposal. The amount of open space to be acquired in this alternative cannot be determined at this time."

36. This is a concept map only. Details would be developed in follow-up work, and local governments would have the lead in determining specific proposals, including trail alignments.

37. See response to comment G-46-3.

38. See response to comment B-7-33.

39. Local governments would develop more detailed land acquisition proposals cooperatively with the National Park Service after the MNRRA plan is approved. Local governments would be encouraged to include appropriate public involvement in their planning activities.

40. This concept was not adopted as part of the final plan but was retained in alternative B. The commenter's objection to it is noted.

COMMENTS

41 CF recommends that the Commission and NPS clearly identify the potential open space and trail development they envision under this proposal.

Commercial Navigation:

p. 96 - "There would be a freeze on new fleeting sites. No-wake zones and other surface use regulations would be established and enforced. The NPS would also cooperate with the commercial navigation industry and respective permitting agencies to ensure that natural and cultural resources are not impaired by current activities."

42 CF opposes the freeze on new fleeting sites and recommends that the Commission and NPS conduct a thorough study, using current figures, on the barge industry and future traffic trends before imposing a freeze. CF is concerned that the no-wake zones and other "surface use regulations" will restrict current barge use of the river resulting in increased costs and serious limits on CF's ability to transport product to our Pine Bend facility and ultimately our member-owners and the farmers they serve.

Natural Resource Management:

- p. 96 - "The NPS would more actively encourage strict enforcement of point source pollution control regulations throughout the entire corridor, setting up its own supplemental air and water quality monitoring program to identify noncompliance and pursue corrective action. Nonpoint source pollution would be reduced through extensive NPS and cooperator education programs and promotion of the use of native species that do not require fertilizers or pesticides."

43 CF would face significantly increased environmental regulation under this proposal. CF is concerned that the NPS would establish its own air and water quality monitoring programs rather than rely on the expertise of local, state and federal agencies currently responsible for air and water quality monitoring. CF recommends that NPS allow such agencies to take the lead on increased monitoring efforts with NPS oversight.

Economic Resource Management:

- p. 97 - "New economic development would be encouraged only when compatible with resource protection objectives."

44 CF is concerned that new economic development will be significantly limited under this plan and recommends that the Commission and NPS review the potential economic benefits to new development as well as resource protection objectives.

- p. 98 - "More liberal use of no-wake zones would also be encouraged to provide additional quiet zones in the corridor and protect shorelines."

45 CF questions the no-wake zone policy and its potential impact on barge use of the river. CF is concerned that this provision will severely restrict our ability to move product up the river to our

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RESPONSES

41. See response to comment B-7-33.

42. While a freeze is retained in alternative B, the proposed plan does not include a freeze on new fleeting sites. However, it now includes a proposal for a surface water use management plan that will address these concerns.

43. The text for alternative B was revised to say that NPS efforts would supplement the efforts of others. This alternative was not adopted as the final plan.

44. New economic development would be more limited under alternative B but not prohibited.

45. Impacts on commercial activities would be considered in this alternative as well as under the proposed plan. Alternative B was not selected as the proposed alternative by the commission and the National Park Service.

Pine Bend facility. CF requests that the Commission and NPS identify the shorelines that need protection as a result of wake damage and provide an opportunity for public comment.

Coordination and Consistency:

- p. 100 - "Additional federal legislation to grant regulatory authority to the NPS or the MNRRA Commission."

46 CF agrees that the NPS and Commission will be required to obtain additional authority from Congress to carry out Alternative B. This illustrates CF's belief that the NPS is planning to implement an alternative that extends beyond the intent of the legislation establishing the MNRRA corridor.

Environmental Consequences:

- p - 164 - "Costs of Complying with Land Use and Environmental Protection Policies."

47 CF recommends that the NPS and Commission conduct further analysis of the potential economic impacts of the proposed land use and environmental policies before adopting the final Plan.

CF appreciates the opportunity to provide comments on the Draft Plan and looks forward to working with the Commission and the National Park Service on revisions to the Plan. If there are further questions, please contact me at (202) 371-9279.

Sincerely,

Rosemary L. O'Brien

Rosemary L. O'Brien
Vice President, Public Affairs

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46. This alternative was not selected as the proposed alternative by the commission or the National Park Service.

47. Some additional text was included in the economic impacts section. The final environmental impact statement is sufficient.

THE RAILROADS SERVING MINNESOTA

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September 10, 1993

Ms. JoAnn Kyral, Superintendent
Mississippi National River and Recreation Area
175 E. Fifth St., Suite #418
Box 41
St. Paul, MN 55101

Dear Ms. Kyral:

Subject: **Draft Comprehensive Management Plan and Environmental Impact Statement**

The undersigned railroads and association members serving the state of Minnesota are grateful for the opportunity to comment on the Draft Comprehensive Management Plan and Environmental Impact Statement (the Plan) for the Mississippi National River and Recreation Area (the Corridor). We are vitally interested in any activities which affect the management of the Corridor. This corridor is important, not only to our day-to-day operations, but to the services we provide individually and in cooperation with other railroads throughout the entire nation.

A number of us are signatory to the comments filed by The Stakeholders' Coalition, and all of us endorse and agree with those comments. Further, we have read the comments filed by the Minnesota Department of Transportation and fully support Commissioner Denn's statements concerning rail transportation, intermodalism and river crossings.

Transportation facilities in the Corridor cannot be viewed as self-contained, independent segments or entities. They must be looked at as integral parts of a transportation network that links the Twin Cities and Minnesota to national and international markets. For example, one jointly owned segment of railroad track in the Corridor handles 95 million gross tons of freight each year. This volume of traffic would equate to one loaded 80,000 pound semi-trailer truck passing a point every 13 seconds.

1 We believe the Plan is deficient in that there is very little economic analysis in general, and none at all concerning the railroad industry. It is imperative no final plan be adopted without the benefit of this analysis, as it may well result in undesired consequences. Analysis of the rail industry should focus on its role in a global economy, the present rail facilities in the Corridor, the future requirements of the industry it serves, both in the region and its obligations as an interstate common carrier.

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1. See response to G-46-3.

2 In its present form, the Plan disregards national policy as established by the Intermodal Surface Transportation Efficiency Act (ISTEA). As embodied in ISTEA, the federal government recognizes the importance of considering transportation as an integrated network, utilizing the strengths of each mode. The Corridor is an excellent example of a multi-modal network combining to serve the commercial needs of the region and nation with barges, railroads and trucks working together.

The Plan treats the barge industry in an incomplete manner, indicating that more research should be done. There is not any consideration given to railroads or other modes of transportation, let alone a need for any research. The Plan is seriously flawed when some of the major activities in the Corridor receive no consideration.

As important as freight transportation is to the economic vitality of the region, the movement of people must also be considered. Both ISTEA and the Clean Air Act Amendments set requirements and policies which may be impacted by the Plan, or impact its implementation. Minnesota has embarked on initiatives in several areas such as High Speed Rail and Light Rail Transit, as well as the existing Amtrak service, which

3 should be considered in any comprehensive plan affecting the Corridor. Projects such as these could require major changes in the configuration of facilities not contemplated by the Plan.

4 Another deficiency in the Plan is it does not appear to provide a mechanism for future amendment, should the need arise, short of continually applying for variances. The Corridor is dynamic, and its ability to accommodate change in uses by its residents and businesses should be considered.

There are recommendations in the Plan that are in conflict with existing federal regulation of rail operations and maintenance. The United States Department of Transportation, through the Federal Railroad Administration (FRA), has jurisdiction over railroad operations, maintenance and safety practices. The Plan ignores the FRA as having any jurisdiction and proposes regulations that would severely conflict with FRA rules and standards.

For example, the Plan would restrict erosion control activities to natural methods or native vegetation, not allowing the use of culverts, ditches, walls or rip rap. Yet the FRA has in place rules and standards that deal, directly or indirectly, with drainage and

5 erosion control which can only be complied with utilizing methods restricted by the Plan. The FRA and rail industry recognize that water run off or intrusion is one of the most severe problems in maintaining the safety of track used to transport passengers and freight.

The track along the Mississippi River now has rip rap in place to control erosion and protect the track and bridge approaches, as well as piling for bridge pier protection. The importance of these forms of protection were evident just this summer during the flooding that occurred on the Mississippi River and throughout the midwest. Without these forms of protection, the lines so vital to the region and the national rail system would have been lost.

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2. A reference to Intermodal Surface Transportation Act was added to the Land and Water Use section of the plan.

3. This is beyond the scope of the comprehensive management plan.

4. The MNRRA legislation specifies that the commission may modify the plan, subject to review by the governor and approval by the secretary, if the commission determines that a modification is necessary. This plan is intended to be a comprehensive policy framework. With the modifications made to address the many comments on the draft plan, it is hoped that frequent amendments to the final plan will not be needed. Because the plan is not a regulatory document and could be tailored by communities for their stretch of the river, there would be no requirement to apply for variances. The final plan was revised to clarify the amendment process.

5. The final plan has been revised to state that it is not the intent of this plan to impose on any federal- or state-regulated industry standards or requirements related to construction, operation, and maintenance that conflict with those enforced by existing federal or state agencies for the safe and environmentally sound conduct of business. It is also recognized, however, that additional standards or requirements that are necessary to protect the sensitive resources of the corridor and that do not conflict with these legal mandates may be enacted and enforced by the appropriate federal, state, or local agency. The National Park Service is not a regulatory agency in the corridor but would work to coordinate the activities of others to achieve the purposes of the MNRRA act and to encourage implementation of the comprehensive management plan.

COMMENTS

The use of vegetation for embankments will simply not provide the protection required. Not only would there be insufficient protection, but vegetation would actually destabilize the roadbed by attracting water and weakening the subgrade. For the safety of the traveling public and freight customers, these regulations must conform to existing industry safety and engineering practices.

6 Another recommendation within the Plan which causes the railroad industry problems is the height limitations placed on structures in the Corridor. Facilities such as signal bridges and pole lines are constructed in the manner, and at the height they are, for both safety and operational reasons. They must be high enough to accommodate the proper clearance and safe movement of the equipment we operate. The height and location of signal bridges is determined by that which is necessary to provide sufficient visibility for safe train operations. The Plan should place no arbitrary restrictions in these areas.

7 The Plan does not contain the specificity necessary for the rail industry to determine restrictions that may be imposed on it by the Plan. Rail operations, maintenance, construction and rehabilitation are regulated by the FRA, Army Corps of Engineers and accepted industry practices prescribed by the American Railway Engineering Association. Individual company policies may require a higher standard. The federal, association and company standards are designed to assure that rail transportation is safe and efficient for customers, the general public, the environment and rail employees. Hazardous materials transportation is also tightly regulated by the U.S. DOT/FRA, with the primary requirement of safe efficient transportation. Conflicting regulations could lead to unsafe or dangerous situations, resulting in Plan requirements being unattainable in light of safety considerations.

In summary, the problems we have identified with the Plan could be addressed by recognizing that railroads must comply with existing or future federal rules, standards or regulations, which may be in conflict with the final adopted plan. Further, the final plan should not be approved until the Commission completes its assignment concerning economic activities and analysis in the area.

We appreciate the opportunity to comment on the Plan. Minnesota's Railroads are available and look forward to working with the Commission and staff to produce a Plan which will insure the natural and recreational resources of the Corridor are enhanced and protected, while not jeopardizing the economic interests we, and those who use and benefit from our services, represent.

Sincerely,
THE RAILROADS SERVING MINNESOTA

/s/ Robert S. Howery
General Manager, Northern Corridor
Burlington Northern Railroad

/s/ Charles N. Wollack
Director Administration & Claims
Duluth, Winnipeg & Pacific Railway

/s/ Jerome W. Conlon
Senior Vice President-Administration
Chicago & North Western
Transportation Company

/s/ John W. Gohmann
Chairman & President
Minnesota Commercial Railway Company

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RESPONSES

6. The height limits are similar to those of the state critical areas program and the shoreland rules. The subject policy was revised to say that exceptions to height limits may be made where necessary for safety, such as for railroad signal masts. Also see response to comment B-8-5.

7. This is a conceptual policy plan that does not contain the level of detail requested. See response to comment B-8-5.

/s/ Patrick A. Pender
Vice President &
Chief Operating Officer
CP Rail System (Soo Line)

/s/ William F. Drusch
President
Twin Cities & Western Railroad Company

/s/ Janet H. Gilbert
Assistant General Counsel
Wisconsin Central Limited

/s/ Lynn A. Anderson
Vice President-Marketing &
Public Affairs
Dakota, Minnesota & Eastern Railroad
Corporation

/s/ Robert T. Bennett
Administrative Manager
Duluth, Missabe & Iron Range Railway Co.

/s/ John W. Gohmann
President
Minnesota Regional Railroad Association:
Chicago & North Western Transportation Company
Dakota, Minnesota & Eastern Railroad Corp.
Duluth, Missabe & Iron Range Railway Co.
Duluth, Winnipeg & Pacific Railway
International Bridge & Terminal Co.
Minnesota Commercial Railway Co.
Minnesota, Dakota & Western Railway Co.
North Shore Scenic Railway Co.
Red River Valley & Weestern Railroad Co.
St. Louis & Lakes Counties Regional Railroad Authority
Twin Cities & Western Railroad Co.
Wisconsin Central Limited

(JSB\MNRRA)

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612/347-8271

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Transportation Co.
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Chicago, IL 60606
312/633-4312

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Executive Director-
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200 W. Madison St., Suite #1003
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312/853-2453

Railroads of

Minnesota



Fast Fact *More rail-tons of ores originate in Minnesota than in any other state.*

Key 1991 Railroad Statistics and Rank Among the States

Number of Railroads	17	20th
Total Rail Miles	4,986	7th
Rail Carloads Handled	2,278,004	16th
Total Tons Carried by Rail	165,347,002	13th
Total Railroad Employment	7,616	10th
Total Wages of Rail Employees	$302,044,000	11th
Average Wages per Rail Employee	$39,659	—
Average Fringe Benefits per Rail Employee	$15,706	—
Railroad Retirement Beneficiaries	24,700	10th
Payments to Railroad Retirement Beneficiaries	$209,492,400	10th

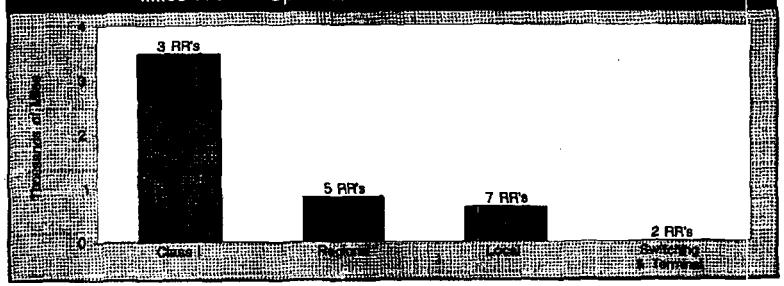
1991 Top Commodities — Rail Tonnage Originated Within State / Percent of Total

Ores	49,063,421	61%
Farm Products	15,323,231	19%
Coal	4,164,595	5%
Food Products	3,978,418	5%
Nonmetallic Minerals	1,489,808	2%

1991 Top Commodities — Rail Tonnage Terminated Within State / Percent of Total

Ores	31,759,782	43%
Coal	20,881,248	28%
Farm Products	9,430,786	13%
Chemicals	3,559,583	5%
Glass and Stone	1,581,404	2%

Miles of Road Operated and Number of Railroads in 1991



Railroads Operating In Minnesota

Class I Railroads

Burlington Northern, Inc.
Chicago & North Western Transp. Co.
Soo Line Railroad Co.

Regional Railroads

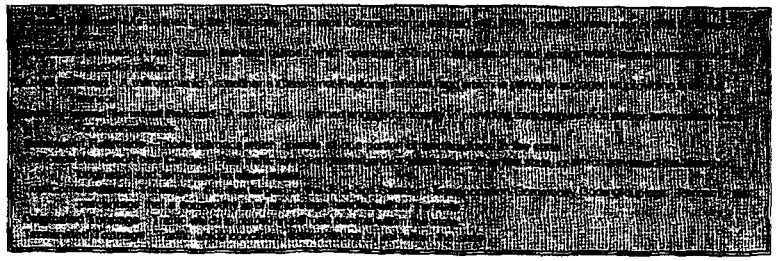
Dakota, Minnesota & Eastern Railroad
Duluth, Missabe & Iron Range Railway
Duluth, Winnipeg & Pacific Railway
Red River Valley & Western Railroad Co.
Wisconsin Central Ltd.

Local Railroads

Buffalo Ridge Railroad Company
Cedar River Railroad Company
Dakota Rail Inc.
Minnesota Commercial Railway
MNVA Railroad, Inc.
Otter Tail Valley Railroad
Twin Cities & Western Railroad Co.

Switching & Terminal Railroads

Duluth & Northeastern Railway
Minnesota, Dakota & Western Railway



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Chamber of Commerce

RESOLUTION TO MAINTAIN ECONOMIC AND ENVIRONMENTAL VITALITY IN THE MISSISSIPPI RIVER CORRIDOR THROUGH BALANCED PUBLIC POLICY

Whereas **the Mississippi River Coordinating Commission is drafting a report to evaluate and guide future public policy in the Mississippi Corridor;**

Whereas **this report will be submitted to the Secretary of the Interior and will directly affect those who work and live near the Mississippi River;**

Whereas **it is crucial that the report maintain the current balance of cultural, environmental and economic resources;**

Whereas **the draft report clearly states that local management of the River Corridor has preserved the river in good condition for over 140 years;**

Whereas **control of the river should continue to rest with local units of government with input and review from outside agencies;**

Whereas **thousands of businesses and over 100,000 jobs depend on the Mississippi River;**

Whereas **the Mississippi River Corridor can and must maintain economic and environmental vitality side-by-side to thrive;**

1 **Therefore; be it resolved that a coalition of citizens, businesses and homeowners requests that the Mississippi River Coordinating Commission continue to balance the needs of the community and the environment. These are compatible goals and in fact one depends upon the other for a productive Mississippi River Corridor.**

We support Minnesotans for the Mississippi and a balanced approach to the Mississippi River Corridor.

Chairman of the Board

President

1. The plan does this.

Young Quinlan Building
81 South Ninth Street
Suite 200
Minneapolis, Minnesota 55402-3223
Phone: 612/370-9132
Fax: 612/370-9195



September 7, 1993

Ms. JoAnn M. Kyral
Superintendent
Mississippi National River and Recreation Area
175 East Fifth Street
Suite 418, Box 41
St. Paul, MN 55101

Dear Ms. Kyral:

The Greater Minneapolis Chamber of Commerce and its membership have a long-standing interest and involvement in the Mississippi River Corridor. The river has been and continues to be a most vital source of commerce and other economic activity for our entire region. In addition, the importance of the river corridor's environmental resources, recreational potential, historical and cultural significance can not be overstated.

We are indeed fortunate that the combined efforts of citizens, including business and all levels of government have shared a longstanding commitment to manage this precious resource well. Unquestionably, the successful balanced approach to managing the Mississippi River, recognizing the importance of all of its resources, has preserved it in excellent condition, as recognized by the initial draft of this plan.

However, the Chamber is very concerned that the current draft Plan of the Mississippi River Coordinating Commission does not maintain a "balance of all resources" approach to managing the river corridor. Though federal law (P.L. 100-696) directs that the economic resources of the area are to be protected, preserved and enhanced, we are of the opinion that this draft plan may have an adverse effect on jobs and economic growth in Minnesota.

1 Specifically, we believe the draft Plan is overly vague with respect to "new" regulations and permitting processes that businesses and communities, along the riverway and those beyond the river but affected by river activities, may be subjected to. This can only serve as a negative impact on future investments that will sustain and/or create new jobs in Minnesota.

2 In essence, rather than the consolidation and coordination of existing regulatory efforts which is the stated goal of P.L. 100-696, we see a new federal bureaucracy being created with the National Park Service being a strong advocate for and willing recipient of a new dominion over local and state process and interests. It is ironic that the draft Plan's affected communities and businesses may face even more regulatory burdens, at a time when there are current efforts under Governor Carlson's leadership, like CORE and the Minnesota Sustainable Development Initiative, to streamline the state's regulatory activities.

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1. See response to comment G-2-2.

2. While Congress directed that the National Park Service be involved in managing the Mississippi River corridor, the plan emphasizes local control and the use of existing state and regional agencies and processes for implementation.

3 The Chamber urges the Commission and the National Park Service (NPS) to revise the draft Plan to correspond to the clear directive in the law which is to develop a program for coordinating and streamlining the permit process. The implementation of any new land use regulations should be prohibited until a coordination/consolidation study of existing local/state/federal regulations has been completed and considered by the Commission.

4 Further, the draft Plan, in our view, inadequately addresses the economic benefits derived from activity on and along the Mississippi River. We strongly urge the Commission and the NPS to consider economic interests in the same manner as other interests are considered. The draft Plan should be modified to underscore the importance of a working river corridor on jobs and economic growth in Minnesota. We must not lose sight of the fact that there is a long history, whereby the environmental, recreational, cultural as well as economic benefits of the river have been compatible and successfully managed.

Thank you for your consideration.

Sincerely,

Connie M. Levi
President

cc: Governor Arne Carlson

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3. The proposal for coordination and consistency in the plan was selected because a detailed study was impossible within the mandated time frame and available budget, and it would duplicate current efforts by the state. The legislation does not require that a program be implemented. The state, in response to an executive order from the governor, has initiated such a study. It seems logical to allow the state, which is heavily involved in the permitting system, to perform this function. The plan does outline a process for streamlining. A moratorium on development regulation is not required nor necessary under the final plan. Additional MNRRA-initiated efforts for coordination and consistency would be a high priority if the state effort does not provide sufficient results.

4. Economic resource protection and the potential impacts of the proposed plan and alternatives on the area economy were considered extensively in the planning process.

Shiely Company
2915 Waters Rd., Suite 105
Eagan, MN 55121
(612) 683-0600
Fax (612) 683-8108

September 9, 1993

Ms. JoAnn Kyral, Superintendent
Mississippi National River and
Recreation Area (MNRRA)
175 East Fifth Street, Suite 418
P.O. Box 41
Saint Paul, Minnesota 55101

Dear Superintendent Kyral:

The Shiely Company is in general agreement with the intent of the Federal Legislation which established the MISSISSIPPI RIVER CORRIDOR STUDY COMMISSION. The Mississippi River is an important and beautiful natural resource. It is also a critical commercial resource to the Metropolitan area and also to the agricultural economy for hundreds of miles around the Metropolitan area. Both of these resources are important and must be preserved.

1 The Shiely Company's greatest concern with the DRAFT COMPREHENSIVE MANAGEMENT PLAN is that the end result; the regulations and the regulators who interpret the regulations, will create new hurdles and additional time constraints in the permitting process. The river economy has to be able to survive and even thrive in this Mississippi River Corridor into the future. In order to do so, industry has to be able to respond quickly to opportunities and requirements. It is very important to the Shiely Company that it be permitted to modify and expand existing operations along the river and to open new locations. This is critical to the company's ability to stay profitable in a very competitive industry.

2 We specifically urge you to rewrite the sections of the Plan which allude to and even prescribe additional layers of review and approval authority. For example; on page 37, the Plan provides for the National Park Service to review all fleeting proposals for conformance with the MNRRA Plan. The Corps of Engineers and the Minnesota Department of Natural Resources are currently responsible for reviewing fleeting proposals. One of these agencies should merely add the MNRRA Plan Compliance to its review criteria.

3 Proposal #1 under PROPOSED POLICIES AND ACTIONS, on page 37, would establish a monitoring program which would determine the need for new or adjusted fleeting areas. The need for change in our industry is identical to that in any industry. It is market driven. This industry is better able to determine the need for change than any agency would be. We submit that the regulatory authority should remain narrow and focused only on the suitability and compatibility of a use for a particular area along the river. Broadening of regulatory authority to include market analysis is clearly beyond the expertise of the public sector and should not be part of a review for compatibility.

The Shiely Company has and will continue to cooperate with the various regulatory authorities in the State of Minnesota. The Company is supportive of the overall intent of Public Law 100-696 to preserve the significant values of the Mississippi River Corridor, to coordinate Federal, State and Local programs and to ensure orderly public and private development in the area. Our greatest

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1. The MNRRA plan is built on existing plans and uses existing regulatory processes. Permitting reviews would use existing time frames to the maximum extent practical.

2. If a fleeting proposal requires a federal action, such as a permit from the Corps of Engineers, the National Park Service is required by law to review it. Reviews would be done concurrently and within existing review processes to the extent practical.

3. To responsibly manage commercial activities that use public resources and to adequately perform environmental review under the National Environmental Policy Act, a basic level of need assessment should be included in the program. This does not imply a full-scale market analysis by public sector employees, but the plan does propose new forecasts and analyses of barge traffic and fleeting needs under the section entitled Economic Resource Research Needs, which would probably be contracted out to experts in the field.

COMMENTS

Ms. JoAnn Kyral
September 9, 1993
Page 2

4 concern about this planning process and about the regulations which will eventually be written is time delays; project killing time delays in the permitting process. It is important, therefore, that there be no new layers of government and that the authority and responsibility for regulating the riverway remain at the Local level.

5 In addition to these specific concerns, we share the concerns expressed in the letter from the Stakeholders' Coalition (copy attached).

Thank you for this opportunity to comment and for your consideration of our comments and concerns.

Sincerely,

Robert H. Bierauger
Environmental Affairs Manager

/da
Attachment

RESPONSES

4. The plan calls for the use of existing processes and time frames, and primary land use decision-making would remain at the local level.

5. Attachment: See letter B-12

September 10, 1993

National Park Service
Ms. JoAnn Kyral, Superintendent
Mississippi National River and Recreation Area
175 E. Fifth Street, Suite 418
P.O. Box 41
St. Paul, MN 55101

Dear Superintendent Kyral:

All members of the Stakeholders' Coalition believe in the continued enjoyment, protection, and multiple use of the Mississippi River. The success of this region in protecting the river and responding to new opportunities to improve the Mississippi River speaks volumes to the care and concern extended by Minnesotans.

The Stakeholders' Coalition further supports the request that went to Congress in 1986 from the Metropolitan River Corridors Study Commission (MRCSC). That study recommended a national designation for the corridor, federal matching funds for completion of the existing trail plan, and coordination and consolidation of governmental regulations in the area.

Significant amounts of time have been expended to date, and all members of the Mississippi River Coordinating Commission (MRCC) are applauded for their time spent reviewing many pages of materials. As stated in previous draft plans, Minnesotans have done an outstanding job of caring for the Mississippi for more than 140 years. The MRCC is a continuing demonstration of that commitment.

Nonetheless, this plan requires significant additional definition and refinement before being approved and forwarded.

The Stakeholders' Coalition presents the following three (3) major points as the foundation of our response to the Draft Comprehensive Management Plan, Environmental Impact Statement on the Minnesota National River and Recreation Area (herein referred to as "the draft Plan"). These points are supported, and recommendations for corrective action are taken, in the attached document.

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1 **First, the draft Plan does not meet all of the requirements of the law.**

- The draft Plan does not adequately meet significant requirements of the federal law (P.L 100-696). The people of Minnesota requested, and the United States Congress directed, the development of a program to:
  - coordinate and consolidate the "permitting" processes,
  - use federal matching funds (primarily) to complete the walking/biking/skiing trail system as already planned along the corridor, and
  - create "policies and programs for the commercial utilization of the Area and its related natural resources, consistent with the protection of the values for which the Area is established as the MNRRA."

1. It is the NPS and commission opinion that the plan does meet all the requirements of the law.

- This draft Plan may have a serious *negative* effect on jobs and economic growth in Minnesota. The draft Plan's unnecessary vagueness about new regulations and permitting processes leaves employers and communities along the riverway, and those beyond the river but affected by river activities, uncertain about what existing operations, new developments or expansions of existing facilities will be permitted. Because of this uncertainty, businesses are less likely to invest in this area or in Minnesota, which means they cannot sustain existing jobs or create new jobs.

- The law directs the Plan be built upon existing local plans and programs. Instead the draft Plan is replete with statements that laws will be passed, either at the state or federal level, to *force* compliance. The draft Plan suggests local control may be severely restricted, which would be detrimental to effective policy creation and implementation.

- The draft Plan has not adequately recognized transportation issues regarding the relationship between the activities within the designated river corridor and the region's transportation systems, as defined by the Metropolitan Council. Furthermore, the draft Plan does not acknowledge transportation's integral role in Minnesota's economic success in the global economy.

- As currently drafted, the Environmental Impact Statement (EIS) for the draft Plan does not appear to meet the requirements of the National Environmental Policy Act (NEPA).

2 **Second, the draft Plan fails to provide for the preservation, protection, and enhancement of economic resources.**

- The draft Plan does not provide "policies and programs for the commercial utilization of the Area and its related natural resources, consistent with the protection of the values for which the Area is established as the MNRRA." For example, an essential inventory of economic resources is deferred, while other resources are exhaustively detailed, charted, and quantified. In addition, the draft Plan recommends alternatives that "open space acquisition would place a greater emphasis on natural and cultural resource protection."

- A clear process for fair compensation for the acquisition of land or interest in land is not provided for, when land is acquired under this draft Plan. Landowners (public and private) fear that they may have to go through a lengthy and costly legal process in order to be fully compensated for the value of any MNRRA-acquired lands.

- The variance definition and procedure summarized in the draft Plan are inconsistent with local ordinances which are based on existing standardized state statutes. This inconsistency will likely cause confusion and delays in local ordinance administration -- negatively impacting reasonable economic planning and development in the corridor.

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2. In addition to considerable material under Land and Water Use, the plan specifically provides for this under Economic Resources Management.

3 **Third, the draft Plan goes far beyond the intent and history of the law.**

- The draft Plan is inconsistent with the legislative history, intent and the "findings" of the law (P.L 100-696). The draft Plan contains programs and policies that go far beyond the request from Minnesotans, the original intent of the law and the law itself, by creating additional levels of bureaucracy and attempting to grant powers not authorized under the law.

- The law defines the requirement that the Plan "recognizes economic activities within the area and provides for the management of such activities, including barge transportation and fleeting and those indigenous industries and commercial and residential developments which are consistent with the findings and purposes of this subtitle." The draft Plan could convert land to open spaces, regardless of the current owners' use and intent, or the existing Comprehensive Plan approved by the Metropolitan Council.

- Because of the vagueness and ambiguities of the draft Plan, there is a strong concern that the National Park Service's traditional authority to regulate in National Parks will be applied along the river corridor and will lead to the imposition of many "administratively initiated" sections of the Code of Federal Regulations (CFR).

- Efforts by NPS to review Air Quality permits inside and outside of the corridor, to plan for additional authority to become environmental regulators in addition to the MN Pollution Control Agency (MPCA) and the federal Environmental Protection Agency (EPA), and to change existing zoning by mandate, are not specifically authorized in the law.

Clearly the draft Plan should more precisely reflect the history, scope, vision, and intent of the original law. To do so requires the completion of required components, the elimination of ambiguities, and the removal of federal initiatives and assumption of powers not authorized in the law.

The attached pages detail some of the changes necessary to ensure that economic vitality, as well as important recreational, cultural and environmental resources, are adequately protected. Without written assurance of this protection, the draft Plan should not go forward.

We appreciate the opportunity to comment on this draft Plan.

Sincerely,

The Stakeholders' Coalition

101 Norwest Center, 55 East Fifth Street, Saint Paul, Minnesota, 55101-1713
(The following page lists the organizations and their representative members signing this document)

Attachments A and B

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3. The National Park Service and the commission believe that the plan meets the requirements of the law and is consistent with its legislative intent. The draft MNRRA plan was based on local plans and regulations. The Park Service would not have had approval authority, but there was a proposal for state legislation to mandate consistency and have the Department of Natural Resources monitor consistency. The final plan deletes the proposal for new state legislation in favor of existing state authorities. This should reduce the impression that NPS involvement in local zoning decisions would be heavy handed. This revised approach is explained in several sections of the final plan.

SIGNATORIES TO THE STAKEHOLDERS' RESPONSE DOCUMENT

/s/ Robert S. Howery, General Manager
Burlington Northern Railroad

/s/ Timothy H. Minor, Director, State Government Relations
CF Industries, Inc.

/s/ P. A. Pender, Vice President and Chief Operating Officer
CP Rail System

/s/ Jerome W. Conlon, Sr. Vice President - Administration
Chicago & North Western Transportation Company

/s/ John D. Denzer, Mayor
City of Cottage Grove

/s/ Anders J. Rydaker, President
District Energy

/s/ Stuart Maitland, Plant Manager
Twin Cities Assemblies Plant
Ford Motor Company

/s/ Fred Dereschuk, Business Manager
International Union of Operating Engineers, Local No. 49

/s/ Patrick S. Thompson, Regional Manager/Public Affairs
Koch Refining Company

/s/ Thomas O. Cochrane, Executive Director
Minnesota Agri-Growth Council

/s/ David C. Olson, President
Minnesota Chamber of Commerce

/s/ E. Peter Gillette, Jr., Commissioner
Minnesota Department of Trade and Economic Development

/s/ Erin T. Roth, Associate Director
Minnesota Petroleum Council
Representing:
Ashland Oil Company
Williams Pipeline Co.
Conoco Inc.
Mobil Oil Corp.
Texaco
Phillips Petroleum
Fina Oil & Chemical Company

/s/ Charles E. Kiester, Sr. Vice President
3M Corporation

/s/ Clair Murphy, Site Director
3M Cottage Grove Center

/s/ Douglas J. Welszhaar, President
The Minnesota Transportation Alliance

/s/ James D. Schultz, Manager,Recycling Development and Regulatory Affairs
North Star Steel Company

/s/ Ross T. Hammond, Director of Environmental and Regulatory Affairs
Northern States Power Co.

/s/ Carl A. Kuhrmeyer, Chairman
St. Paul Area Chamber of Commerce

/s/ Jonathan J. Wilmshurst, Vice President and General Manager
Shiely Company

/s/ Jody Hencler, President
South St. Paul - Inver Grove Heights Chamber of Commerce

/s/ G.K. Shurb, President
Tow, Inc.

/s/ James C. Hartman, President
Upper Mississippi Waterway Association

/s/ Willie A. Brown, President
Willie's Hidden Harbor Marina

Attachment A

SUPPORTING EXAMPLES AND RECOMMENDATIONS

A. The draft Plan does not meet the requirements of the public law (P.L. 100-696).

Examples:

4 • The clear directive in the law is to develop a program for coordinating and consolidating the permit process, essentially streamlining the existing process. The draft Plan merely indicates a meeting will be held. The draft Plan strongly indicates more regulation and communications will be added by the NPS, before such coordination is considered. Without that program, this draft Plan should not advance as it could thwart the State's current streamlining activities.

5 • With the designation as a National River and Recreation Area, the intent was to secure fifty percent (50%) matching funds from the Federal Government for *completion of the "existing, planned recreation system"* along the 72 mile corridor. This is now shown as the lowest priority for use of federal funds in the draft Plan.

Recommendations:

6 • We recommend that the draft Plan be revised to be consistent with the law's original intent. Specifically, the law was written to recognize the historical, recreational, scenic, cultural, natural, economic and scientific resources derived from activities on and along the Mississippi River. While spending extensive resources and time to detail most of these other values, the inventory and vision for economic activities is left as the weak link. The economic benefits of the working river, and the effect the Plan will have upon

7 economic activity, should be more fully developed. An economic analysis, suggested in the draft Plan, should be performed prior to the adoption of a final Plan.

8 • The prioritized use of the 50% matching federal funds must be consistent with the law, as well as the request of Minnesotans in 1988, which was based upon the findings of the Metropolitan River Corridors Study Commission (MRCSC). Completing the "existing, planned recreation system" should be the highest priority.

9 • A program for coordinating and consolidating the regulatory process should be implemented. The implementation of any new land use regulations should be prohibited until a coordination/consolidation study required by the law *[in Section 703 (i)(4)]* has been completed, reviewed and adopted by the Commission.

B. The draft Plan is inconsistent with the legislative history, intent and the "findings" of the law (P.L. 100-696).

Examples:

10 • The MRCSC Final Report (January 1986) sheds light on the numerous concerns raised in the report that should have been, but were not, addressed and corrected in the draft Plan.

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4. See response to comment B-10-3. The MNRRA legislation does not say that a program must be in place when the plan is completed but only that one be identified. The proposed review process for permits under this plan uses existing mechanisms and process. Therefore, the plan would not thwart but support streamlining activities by others.

5. There is a recommendation in the *Metropolitan River Corridors Study Committee Final Report* to provide a funding program for completing the existing, planned recreation system. While this is an excellent report that contains many good recommendations that were carried forward to the MNRRA plan, the commission and the National Park Service are not restricted to its contents. The criteria listed for land acquisition grants in the MNRRA plan are not listed in priority order. Completion of the existing, planned system is a criterion equal to the others in the plan, and local land acquisition would not be limited to this. The subject section of the plan was revised to explain this.

6. The commission and the National Park Service believe that plan is consistent with the intent of the law.

7. See response to comment G-46-3.

8. See response to comment B-12-5

9. This is in the plan. See responses to comments B-10-3 and B-12-4.

10. The commission and the National Park Service believe that plan is consistent with the MNRRA act. There is no requirement to address concerns raised in the 1986 report.

COMMENTS

11 **First, the law directs the Plan be built upon existing local plans and programs. In other words, local control is integral to fulfill the objectives of the law. The draft Plan, however, proposes to give the National Park Service (NPS) approval authority over local zoning decisions.**

12 In the MRCSC guidelines for legislation, the committee states, "Care must be taken to avoid creating a new level of government. A new organization would not have veto power over the actions of its member agencies; it must not meddle in agency decisions . . . Any selected alternative must not be a new permit agency. Any new organization must be convenient and accessible to local governments." (p. 28).

The draft Plan, however, fails to acknowledge these concerns and recommendations in numerous areas:

13 • The State, through the DNR, is already involved in reviewing local plans and programs under Shoreland and Floodplain legislation, yet the draft Plan proposes that new approval authority ("certification" in the draft Plan) be provided on behalf of the NPS. This authority essentially creates a new level of bureaucracy.

14 • The draft Plan states that "State legislation would be sought to require community plans to be updated to conform to this plan"(page 24). This statement indicates that the Plan will supersede all other programs, adding not only another layer of bureaucracy, but also creating confusion as administrators attempt to discern when existing regulations apply and when the draft Plan's regulations apply.

15 • The draft Plan suggests that the Environmental Protection Agency may grant a permit "subject to NPS concerns." In other words, the NPS becomes a "Superagency." This raises the concern that NPS will have the authority to reject a new project or an expansion that would have otherwise been acceptable. This action appears contrary to the intent of the law.

16 • The draft Plan is defined to be "in effect" until the local plan is approved. This leaves local plans in limbo, for an indefinite time period, while there are no findings that any plan violates the purposes of the law (P.L. 100-696).

17 • The draft Plan is unclear on how many decision making bodies would be involved with land use issues. It proposes that an NPS and MNRRA Commission "review of major land use decisions" and a DNR "review of development proposals." This review period would lengthen the existing review process which would negatively impact economic development.

Recommendations:

18 • The Plan should recognize that the existing local plans and programs are the result of significant time and effort and careful study by officials to develop a system which meets the needs of the affected communities and the region. These existing policies should guide the development of a coordinated system, rather than having new policies and programs nullify them. To this end, "certification" should be clearly defined.

RESPONSES

11. See response to comment B-12-3.

12. The MNRRA plan uses existing agencies and processes and does not create a new permit agency.

13. The final plan was clarified concerning certification. There is no veto authority.

14. The proposal for state legislation was dropped from the plan.

15. Under the MNRRA legislation the National Park Service does not have authority to reject a permit for a new project or expansion. The procedures for reviewing federal permits are clearly articulated in the MNNRA legislation.

16. Local plans would still be in effect regardless of their consistency with the MNRRA plan.

17. The final plan was revised to simplify the process and remove any perceived overlap. Reviews would be concurrent to the maximum extent practical.

18. A statement was added to the opening paragraphs of the proposed plan to clearly state that it does recognize that existing plans, programs, and systems are the result of extensive time and effort. The plan was also clarified to state that the Department of Natural Resources would not have a veto authority.

19 • Specify that all federal agency permit reviews, including NPS project reviews, will be conducted concurrently with the existing timelines provided for by such federal and state statutes. Furthermore, any such review authority should be delegated to appropriate State authorities, so as not to disrupt the streamlining efforts of the State and the coordinating and consolidating mandates of the law.

19. This concept was incorporated into the Partner Roles section of the final plan.

20 • NPS' review capacity should be limited to advisory review comments and should clearly stop short of a "de facto" veto power. Threshold levels for "major projects"

21 should be established to limit NPS review to proposals exceeding the State Environmental Assessment Worksheet (EAW) and/or EIS requirements.

20. The NPS role was clarified, and there would be no veto power.

21. See response to comment G-25-27.

22 **Second, economic resources are not recognized in a manner consistent with legislative intent under the definition of a "working river."**

22. Even though the term "working river" is not used in the legislation, the concept is recognized and incorporated in the plan. Additional recognition of this concept was incorporated into the final plan.

23 • In the MRCSC study, "the committee's study made it clear that economic development on the Mississippi and Minnesota River needs to be recognized and formalized as a legitimate activity. This needs to be done especially at the state and regional levels." (p. 24). As noted earlier, the economic benefits derived from activity on and along the Mississippi River are inadequately addressed in the draft Plan.

23. The subject section of the plan was revised to add state and regional economic development to local economic development activities.

24 • The 1986 MRCSC study also noted that "Economic uses of the river and riverfront development in Minneapolis and St. Paul have significant impact on the national, state and regional economy." (p. 35). The draft Plan, however, mentions the economic importance of the corridor in a limited fashion. This action biases activity away from economic interests which are vital for the continued growth and vitality of the state and region.

24. Several statements were added throughout the plan stressing the economic importance of the corridor.

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Recommendations:

25 • There should be written assurance of full consideration among historical, recreational, scenic, cultural, natural, economic and scientific resources. Economic interests must be considered in the same manner in which other interests are considered. In 1986, the Committee commented that "this problem [considering economic interests] needs to be addressed in any land use plans and resource management plans prepared for the corridor." (p. 30).

25. Text was added to stress the importance of economic resources and considering the economic impacts of corridor decisions.

26 • The Plan should specify the policies and programs for enhancement of nationally significant economic values and economic utilization of the river corridor, as required by the law.

26. The plan does this.

27 • The Plan should provide more favorable consideration of residential, light industrial, and other related economic land uses as recommended by several local units of government at the MNRRA public hearings.

27. See responses to comments G-8-7 and G-10-1.

28 **C. The draft Plan will have a serious negative effect on jobs and economic growth in Minnesota.**

Examples:

29 • The Minneapolis Community Development Agency (MCDA) and the St. Paul Port Authority have been seeking development of various light industrial and/or research and development parks located within the first 300 feet of the river corridor. If these projects are non-river related, they may not be allowed to proceed under the draft Plan. This restriction would essentially negate the positive policies and programs they have developed to spur local community development, create jobs and increase the tax base.

30 • On page 77, the draft Plan states that the NPS will "review major land use proposals and all federal, federally funded, or federally permitted proposals." Our concern is how the NPS defines a "major project." For example, the NPS could determine that a routine plant expansion or change in production process is a "major project" and step in to influence the project. Because this is undefined, businesses will be hesitant to invest capital in the corridor when they cannot anticipate and plan for regulatory impacts.

31 • Many potential and proposed commercial, light industrial and industrial businesses along the corridor could be restricted from growth under the draft Plan. For example, potential land and construction values along the Mississippi River Corridor in St. Paul are estimated at $80 million. Additionally, a proposed $200 million cogeneration plant located in the corridor may be adversely affected by the draft Plan, as could more than $200 million in other potential commercial, industrial and residential projects currently planned for development in Minneapolis.

32 • In discussing the Economic Resource Research Needs, the draft Plan concentrates on barge activity. Barge transport is only one of the several modes of transportation impacted by the Plan. The draft Plan, however, fails to acknowledge the need to develop new forecasts and analyses for trains, trucks and planes economically impacted by the designation.

Recommendations:

33 • The draft Plan should be modified to acknowledge the importance of a working river corridor to Minnesota's economic vitality. Minnesota will only continue to enjoy the recreational and cultural benefits of the river if it has a strong economy to support and sustain its citizenry. The Plan should be more specific in its definitions to remove the uncertainty in the language which discourages businesses from investing along the river corridor.

34 • Threshold levels for "major projects" should be established to limit NPS review to proposals exceeding the Environmental Assessment Worksheet (EAW) and/or EIS requirements.

35 • The Plan should detail what the procedures and criteria will be for certification of local zoning actions, and what the specific qualifying criteria are for determining "substantial conformance."

28. While this opinion is expressed in several of the comment letters, it is generally not substantiated by concrete evidence or examples. Where specific examples of potential adverse impacts have been identified (i.e. low height limits in downtown areas) the plan was revised to address these specific concerns. Based on the available research and many years managing NPS areas, the National Park Service has found that park plans generally have a neutral to positive impact on the local economy. This includes additional employment, amenity values, and tourism expenditures. These impacts are reflected in the Environmental Consequences section of the document.

29. See responses to comments G-8-7 and G-10-1.

30. See response to comment G-25-27.

31. See response to comment B-12-27.

32. A statement was added to the plan regarding economic research needs for a broader inventory of transportation resources, which would be analyzed in the resources management plan.

33. The working river was recognized in the draft plan, and additional recognition was added to the final comprehensive management plan. Additional specific language was added to the glossary.

34. See response to comment B-12-30.

35. The plan was revised to explain that these issues would be addressed in follow-up work during the initial stages of plan implementation.

36 **D. Fair compensation for the purchase of private and public land or interest in land is not clearly provided for, if that land is acquired under this draft Plan.**

Examples:

37 • On page 33, references are made for land acquisition, which would appear to be beyond the plans existing in 1988. An option on page 94 contains the sentence: "Currently undeveloped areas, totaling about 19,000 acres, would be kept open and used for recreation to the maximum degree possible." Another option on page 95 indicates "The NPS would take a *much greater role in promoting additional* park land acquisition in the corridor, including direct NPS land acquisition." Because these options are still open for approval, we are concerned that NPS could acquire addtional lands which currently may be considered available for other development plans.

38 • On page 87, the draft Plan discusses land acquisition facilitated by a grant program authorized in the MNRRA legislation in coordination with existing state and regional funding programs. However, the process is not as clearly defined as necessary for landowners to understand how their property rights will be affected.

39 • The draft Plan refers to land acquisition along the corridor, yet in 1986 "The committee found there is no need for any major additions to the existing, planned recreation system along the three rivers in the Metropolitan area." (p. 40). The committee also limited land acquisition by noting that "the legislation would not provide any new authorization for land acqisition along the Mississippi." (p. 12).

Recommendations:

40 • The Plan should specify that any local, regional, state or federal acquisition of lands or interests in land under this plan are subject to the Federal Real Property Acquisition Act and Uniform Relocation Act. And further specify that land valuations for this purpose shall not consider the impact of the zoning guidelines contained in the MNRRA plan as it constitutes "project influence" under the meaning of those laws.

41 • Consistent with legislative history, the Plan should prohibit the use of federal funding participation in the acquisition of any park or open space lands until after the completion of the "existing, planned regional park system" and those lands recommended to be acquired for land acquisition for NPS administrative purposes.

42 **E. As currently drafted, the Environmental Impact Statement (EIS) does not appear to meet the requirements of the National Environmental Policy Act (NEPA).**

Examples:

43 • The alternatives to the draft Plan are not described in sufficient detail for an adequate comparison/contrast among the different plans. Nor does the draft EIS indicate those

44 alternatives that were considered but rejected.

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36. See response to comment B-1-9.

37. The legislation does not limit land acquisition to 1988 plans. Except for a planned 5-acre donation, the National Park Service does not intend to acquire land under the proposed plan. The commenter is referring to a statement from alternative B, which was not the selected alternative.

38. This is beyond the scope of the comprehensive management plan (see response to comment B-1-9).

39. See response to comment B-12-37.

40. See response to comment B-1-9.

41. See response to comment B-12-5.

42. The National Park Service disagrees with this comment.

43. Adequate detail on the alternatives has been provided to facilitate comparison and decision making.

44. Alternatives considered but rejected were listed in the draft and are highlighted in the final plan with a subheading.

COMMENTS

45 • The description of the affected environment does not contain sufficient detail -- for example, with respect to socioeconomic resources. The descriptions of environmental consequences are often conclusory, and often present no supporting data or citations to supporting data. (For examples, see the descriptions of "cumulative effects" on pages 167, 171, 175, and 178.)

46 • The draft Plan also does not contain any clear description of mitigative measures as required by the statute and the regulations of the Council on Environmental Quality.

Recommendations:

47 • Revise the draft Plan to supply adequate detail, and then assess the impacts in a manner clearly consistent with local, state, and federal standards.

48 • The Plan should specify that the Secretary of the Interior will not seek the imposition of any stricter state or federal air and water quality standards.

49 **F. The draft Plan has not adequately addressed transportation issues regarding the relationship between the activities within the designated river corridor and the region's transportation systems, as defined by the Metropolitan Council. Furthermore, the draft Plan does not acknowledge transportation's integral role in Minnesota's economic success in the global economy.**

Examples:

50 • The draft Plan does not acknowledge the Major River Crossing Study updated in 1989, which assigns a high priority to reconstruct many Mississippi River crossing points (TH 169 in Anoka, TH 61 at Hastings, I-494/Wakota and Wabasha Street among others).

51 • The policies, parkway, and bridge crossing standards listed on pages 24 and 29 are in conflict with the recommendations of the Major River Crossing Study and the Metropolitan Highway System Plan classification of Shepard Road.

52 • The draft Plan does not consider the directives of the Federal Intermodal Surface Transportation Efficiency Act (ISTEA) to integrate intermodal planning in the management of transportation infrastructure. For instance, ISTEA promotes greater linkage between modal systems at terminal locations such as airports, ports, rail facilities, barge and grain terminals. All these uses have historically occurred in the river corridor and will need to continue to do so.

53 • The draft Plan fails to recognize the critical importance that various modes of transportation along the river corridor have upon Minnesota's economy as we compete in the world market. For example, Minnesota farmers depend on trucks and rail moving in-bound to the river and barge transport on the river for export of their products through Mississippi River ports.

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RESPONSES

45. The National Park Service believes that the environmental impact statement is sufficient for decision making.

46. According to pertinent regulations and guidelines, mitigating measures can be described as part of the alternatives or the environmental consequences rather than in a separate section.

47. Adequate detail has been provided for a conceptual management plan and the impacts are assessed in a manner consistent with applicable standards.

48. There is no legal authority to restrict the secretary of the interior from seeking the imposition of stricter standards, but the final plan builds on existing corridor plans and stresses existing standards and processes.

49. A statement was added to the Land and Water Use section of the plan acknowledging transportation's role in the economy. Transportation is necessary to preserve economic resources in the area.

50. A reference to the subject study was added.

51. See response to comment G-15-16. The policy was revised to address these and related concerns expressed by other commenters.

52. A policy was added supporting regional transportation planning, including the concepts embodied in the Intermodal Surface Transportation Act.

53. A statement was added recognizing the importance of the various modes of transportation in the corridor.

Recommendation:

54 • The Plan should call for an inventory to be taken of the current and planned transportation infrastructure in the river corridor prior to developing a strategy for providing adequate transportation access in and through the corridor. This inventory should be developed with the active involvement of local communities, private carriers and terminals, the Metropolitan Council, Minnesota Department of Transportation, and the U.S. Department of Transportation.

54. A statement was added to the plan identifying the need for more transportation infrastructure inventories under the economic research needs. Data was added to the appendix.

55 **G. Because of the vagueness of the draft Plan, there is a concern that NPS efforts to regulate along the river corridor will lead to the imposition of many "administratively initiated" sections of the Code of Federal Regulations (CFR).**

55. Under the MNRRA legislation the National Park Service does not have the authority to issue such CFR regulations, except for activities on lands directly under NPS control. NPS landownership in the corridor would be minimal under the proposed plan and would total only about 50 acres.

Examples:

56 • The review process is not detailed sufficiently to permit validation with existing practices and procedures. Furthermore, the NPS has not specifically stated in the draft Plan their intention to provide concurrent review, in accordance with other review procedures already in effect.

56. Some detail was added to the plan implementation section on the review process; the intent for concurrent reviews was stressed.

57 • On page 40, there is language to extend the 'purview' to the "Mississippi Watershed." This implies that regulations, such as water quality regulations, may be extended beyond the boundaries of the corridor defined in the law. We are concerned that this action would result in numerous and varied levels of environmental regulations depending upon location; this would be extremely difficult to monitor.

57. The subject policy addresses educational programs, not regulatory programs.

58 • There are numerous references to new initiatives into the area of environmental regulation (page 41), including the statement that "federal regional air quality permits" will be reviewed "from sources inside and outside of the corridor." This would extend the boundaries of NPS authority.

58. The MNRRA plan does not extend the authority of the National Park Service. The subject statement was revised to eliminate the phrase referencing sources "outside the corridor." This was done so that the National Park Service would not be obligated to review every air quality permit outside the corridor, but it would have the discretion to choose those outside the corridor that might significantly effect the corridor.

Recommendations:

59 • The Plan should provide a model ordinance for the proposed local land use controls detailing the minimum zoning dimensional standards, uses within the river area, and procedures for local ordinance administration.

59. Providing a model ordinance is beyond the scope of the MNRRA plan but would be done in the early phases of plan implementation.

60 • Provide a specific exemption from 36 CFR (Code of Federal Regulations) for the lands, waters and activities under the law (P.L. 100-696) and the Plan.

60. The National Park Service cannot provide a blanket exemption from 36 CFR. However, the MNRRA legislation states that 36 CFR applies only to NPS-owned land, which would be very limited under the proposed plan.

61 • The Plan should state that project and permitting reviews will be conducted concurrently with existing state and federal review processes.

61. This has been added.

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The Stakeholders' Coalition

The Stakeholders' Coalition was formed in the Spring of 1992 for the purpose of getting communities, businesses, industry and labor involved in the development process of the MNRRA plan. As this group has grown and become more diverse, its members continue to share a common goal: concern for the economic base and a progressively cleaner environment along the MNRRA corridor.

This coalition is dedicated to achieving a balance in the proposed MNRRA plan. Coalition members desire to work with the Commission to obtain a fair and balanced approach to the many complex economic and environmental issues facing the people of Minnesota along the Mississippi River corridor. The stakeholders have also been concerned about issues regarding local control and recognition of the Mississippi River as a "working river." This interest is evident through individual stakeholders' activities and concerns raised at each stage along the formal MNRRA approval process.

CENEX LAND O LAKES CENEX

September 9,1993

Superintendent
Mississippi National River & Recreation Area
U.S. National Park Service
175 East Fifth Street
Suite 418
Box 41
St. Paul,MN. 55101 Re:Draft Comprehensive Mgmt. Plan

Dear Sir/Madam:

Cenex/Land O' Lakes Ag Services,described on the attachment, fully supports the Positions taken by CF Industries,Inc. Salem Lake Drive,Long Grove,Illinois,a Company we have approximately $150,000,000.00 Invested In,in their views on the Draft Comprehensive Management Plan for the Mississippi National River and Recreation Area (MNRRA).

Copies of their proposals are attached to this letter.

Cenex/Land O' Lakes Ag Services relies very heavily on Low-Cost Barge Movement on the Upper Mississippi River. The CF Industries Facilities located at Pine Bend,Minnesota Store and Ship approximately 20% of All of our Fertilizer Products sold in our 15 State Sales Region. It is vital that these Low-Cost Barge Economics continue into the future. Being an Agricultural Regional Cooperative,all Profits made during the year are returned to our member owners,in the form of Patronage. The greater the economics the more Patronage Returned. Barge economics are vital to continued business prosperity and profitability. The Mississippi River Area discussed is a Major Key to this.

If you have any questions concerning this position please do not hesitate to contact us.

Sincerely:

Paul Patterson,Director
Fertilizer Supply & Dist.

P.O. Box 64089, St. Paul, MN 55164-0089 • (612)451-5151 • 5500 Cenex Drive, Inver Grove Heights, MN 55077

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1. The final plan further emphasizes the importance of commercial navigation in the corridor and states that barge transportation would continue on the river.

(Please include the data contained below into the record)

CENEX LAND O LAKES CENEX

THIS IS CENEX/LAND O'LAKES AG SERVICES

Cenex/Land O'Lakes Ag Services is a joint marketing venture involving two of the nation's leading agricultural supply cooperatives. With more than $2.8 billion in annual sales and 130 years of combined experience, the joint venture serves approximately 320,000 farmers and ranchers through nearly 1,600 local cooperatives in 15 states across the Midwest and Pacific Northwest. Cenex/Land O'Lakes Ag Services supplies those local cooperatives with a wide range of petroleum products; feed; seed; plant food; crop protection products; farm products; animal care products; tires; batteries and accessories; agricultural equipment; transportation services; and farm and ranch management services. Cenex/Land O'Lakes customers can count on:

Through Cenex/Land O'Lakes Agronomy Company –

- an agronomy operation that serves the largest network of plant food dealers in North America, backed by Cenex and Land O'Lakes combined 38 percent ownership in CF Industries, one of the nation's leading plant food manufacturers.
- a major supplier of crop protection products that distributes more than 700 products through 25 strategically located Express centers.
- the owner of Imperial, Inc., a crop protection products formulating company which produces Cenex/Land O'Lakes-branded products.
- a provider of a wide range of seed and agronomy technical services available through the retail agronomy services program: Crop Production Specialists, the Croplan Retail Training Program, Centrol, AgriSource and AgriSource Lab.

Through Land O'Lakes –

- one of the nation's leading feed suppliers, with nearly 300 feed manufacturing plants in the system.
- the number one feed program in the Upper Midwest through a growing number of feed consulting and sales programs, and an expanding presence in the Pacific Northwest through Western Feed operations.
- one of the nation's leaders in the manufacturing and sale of animal milk replacers, with major international sales.
- a major member of Cooperative Research Farms, the world's largest livestock research network.
- the expertise of Answer Farm, a leading animal and plant research facility, and more than 10,000 research and development plots across the trade territory, supporting a complete system of crop production and livestock products and services.
- a basic seed producer, with strong research and conditioning plants located throughout the territory.
- a major marketer of hybrid corn, soybeans, forage, sunflowers and turf seed.

Through Cenex –

- a petroleum company that is the nation's 57th largest oil producer and has the 69th largest domestic oil reserves among the top one half of one percent of the nation's oil companies.
- a significant wholesaler/reseller of over 1.4 billion gallons of refined fuels with ownership of a 42,500 barrels per day refinery at Laurel, Montana, and a 74.2 percent ownership in the National Cooperative Refinery Association, with its 75,000 barrel per day refinery at McPherson, Kansas.
- an operator of 918 miles of crude and products pipelines and eight terminals.
- one of the nation's top four propane suppliers.
- a leading operator of card and key activated gas dispensing systems serving more than 500 communities.
- the blender of more than 60 types of lubricants, for everything from small engines to automobiles to heavy equipment and industrial machinery.
- the developer of new petroleum retail outlets including Cenex convenience stores, which rank number 46th of the nation's top 50 C-Stores; Cenex car and truck stops and Cenex Fast Lube.
- a major credit card marketer with the Cenex Convenience Card.
- one of the nation's larger private truck fleets with all of the specialized equipment required to serve the transportation needs of agriculture and rural America.
- a combined Cenex and Land O'Lakes 24.3 percent ownership in Universal Cooperatives, a farm, ranch, home and vehicle (tires, batteries and accessories) products and equipment supplier.

8/93

P.O. Box 64089, St. Paul, MN 55164-0089 • (612)451-5151 • 5500 Cenex Drive, Inver Grove Heights, MN 55077

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MARINE SURVEYORS • GENERAL ADJUSTERS • APPRAISERS

SAINT PAUL, MINNESOTA 55104

September 9, 1993

Ms. JoAnn Kyral, Superintendent
National Park Service
Mississippi National River and Recreation Area
175 South Fifth Street, Suite 418
P. O. Box 41
St. Paul, Minnesota 55101

Dear Superintendent Kyral:

I have been following with great interest the MNRRA meetings and hearings regarding the future of the Mississippi River in the 72 mile designated area.

1 There appears to be a very real danger in creating this new National Park within this large metropolitan area. It will cause a large difference of opinions and legal conflicts on how the river should be used, especially between the commercially interested users and the National Park "purists" who appear to be fighting to return the river to a "natural" or pre-developed condition as far as possible. It will also cause much friction between land owners and the Park Service on lands to be purchased, used, or possibly even confiscated by "eminent domain" laws.

The Minneapolis-St. Paul Metropolitan Area exists because of the river, not by happenstance. The river brought the commercial interests to the area, they developed the area, and continue to use the river for the transportation of Minnesota's commercial products. This includes necessary terminals, railroads, road and bridges to and from the terminals to gain access to the river, which is the most cost effective method of transporting agricultural and industrial products and materials to and from Minnesota and the rest of the world. It also includes facilities to provide barge fleeting for staging their use in the metropolitan area. In other words, the river is their life line to successfully compete in the world of commerce. Do not designate these companies to a back seat place in MNNRA.

I support wholeheartedly the examples and recommendations of the Stakeholders' Group, which I attach for your reference.

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1. The Mississippi National River and Recreation Area is a unit of the national park system but is not a traditional national park. Congress recognized this situation and the plan reflects the need to consider a wide range of uses while protecting important resources.

2 I also support looking into the area of the Mississippi River between St. Cloud and Minneapolis for this National Park. Perhaps a "more natural" section of the park could be designated in that area and undeveloped land be obtained and preserved while it is still available as it is this area where our future clean water must come from, flowing into our new "Metropolitan National Park".

Thank you for allowing me to submit these comments to your office.

Sincerely yours,

G. K. Shurb
President
Tow, Inc.

GKS/tt

Enclosure

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2. This is beyond the scope of the MNRRA plan.

RIVERFRONT REDEVELOPMENT CORPORATION

September 9, 1993

Mr. Peter Gove
Chairman
Mississippi River Coordinating Commission
175 East 5th Street, Suite 418
St. Paul, Minnesota 55101

Ms. Joann M. Kyral
Superintendent
Mississippi National River and Recreation Area
175 East 5th Street, Suite 418
St. Paul, Minnesota 55101

Dear Mr. Gove and Ms. Kyral:

As Ms. Kyral knows from our previous discussions, the Riverfront Redevelopment Corporation (RRC) is committed to effecting the enlightened development of the Mississippi River Valley in the context of a Great River Park. As such, RRC is concerned with balancing economic development, housing, recreational, and cultural uses with the preservation of natural resources. Thus, we have been supporters of the efforts of the Mississippi River Corridor Study Commission (MRCSC), the Mississippi River Coordinating Commission (MRCC), and the Mississippi National River and Recreation Area (MNRRA) legislation.

I have acted as representative of RRC with respect to MNRRA. As such, I am specifically concerned with MNRRA drafting issues. I have the following comments concerning the Draft Comprehensive Management Plan, Environmental Impact Statement on the Minnesota National River and Recreation Area (the "Draft Plan"). I hope that you find these suggestions worthy of consideration as you move toward completion of your task.

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1. ***The very form of the Draft Plan is a source of many problems and it should be rewritten to make it readable and usable by members of the public***

- The Draft Plan is prolix to the point of pain.
- The draft plan needs to be organized around "black letter" principles that can be grasped from an executive summary so that one does not have to read over 200 pages to be certain of the intent of the proposal.
- The present format favors bureaucrats and professional lobbyists and defeats the efforts of mere citizens, who have other obligations and limited time, to fully understand it.
- The vagueness of many parts will encourage wasteful litigation and discourage timely action by persons operating in the river valley.

1. The contents and format of the plan are directed by the MNRRA legislation, the NPS General Authorities Act, and NPS guidelines for preparing general plans. The comprehensive management plan contains a lot of complex land use policy material that is not amenable to simplification. The plan must also serve to guide agency planners and managers, and much detail could be lost in trying too hard to make it a document for the general public. However, some steps were taken to respond to this and related comments on the document. For example, the riverfront policy was simplified, some descriptive material in the plan portion of the document was moved elsewhere, and duplicated policies were eliminated. Final editing increased comprehension and improved the plan's readability somewhat. These steps at least partially addressed this comment.

2 2. ***The effort of the Draft Plan to establish a single set of rules for the entire 72 mile length of the river ignores the diverse economic and natural "microclimates" that exist along its length. A more site specific approach should be used.***

- A single 300 foot set back rule is too tight in areas such as downtown St. Paul but may well be inadequate in rural areas. In the words of your prologue, "The Mississippi is many rivers as it passes through this metropolitan corridor."
- Discouraging uses unrelated to the river within 300 feet of the shore ignores the aesthetic quality of the uses and their contributions or damage to the aesthetics of the river shore. A more flexible rule should be articulated that encourages all uses to compliment and improve the aesthetics of the shore line and its use by everyone without a blanket prohibition of uses unrelated to the river.

3 3. ***The Draft Plan fails to deal clearly with the issue of the expansion of existing uses. A clear policy on this important issue should be stated to avoid litigation and delays.***

- Treating major industrial installations as non-conforming uses that require a variance before any expansion or rebuilding is not a good answer. Some threshold of change before special review is required should be established.
- NPS staff should meet with major industrial stakeholders to develop a better understanding on both sides of the issues involved and a clear statement of principles should be articulated as part of the final plan.

While these comments are negative regarding certain formal aspects of the document, it should be stated clearly the RRC supports many other aspects of the MNRRA efforts. For instance, we applaud your efforts to complete the walking/biking/skiing trail system for the entire length of the corridor. We also strongly support NPS plans for a major interpretive center in St. Paul and limited NPS ownership of land in the corridor. RRC urges NPS to utilize its resources for interpretation and education instead of land acquisition. Acquisition funds should be used to match local and state funds to complete local park plans. Finally, we warmly welcome NPS representations that it seeks a seat at the table during governmental review of development plans and not a separate level of review. Timely review and clear rules regarding development will make it easier for everyone to accept stricter substantive rules regarding the aesthetics of riverfront development.

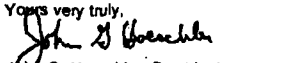
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We fear, however, that the formal weaknesses of the Draft Plan and the MNRRA process encourage a feeling of distrust for NPS and the good goals of MNRRA. Therefore, we urge a thorough rewriting of the plan so that it will be a usable document in the future and not just a playground for lawyers and lobbyists and a trap for the unwary. RRC stands ready to further assist MRCC and NPS, various stakeholders, and others in guiding the enlightened development of the MNRRA corridor.

Please feel free to call me if you have any questions or requests.

Yours very truly,



John G. Hoeschler, President
Riverfront Redevelopment Corporation
420 Pillsbury Center
Minneapolis, Minnesota 55402
612-337-9206

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2. A visual analysis was conducted along the river. Several schemes to recognize the diversity of the 72-mile length and segment the corridor were rejected by the commission in favor of an overall framework. The revised plan clearly gives local governments the flexibility to address the unique aspects of various stretches of the river and resolve site-specific issues within the overall framework of the plan.

3. See response to comment G-24-2.

4. See response to comment B-1-9. Local government land acquisition would be facilitated by the NPS grant program if it is funded by Congress.

5. This was revised and commits the National Park Service to concurrent review to the maximum extent practical.

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Minnegasco
A Division of Arkla, Inc.

11 October 1993

Ms. JoAnn M. Kyral, Superintendent
Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418, Box 41
St. Paul, Minnesota 55101

RE: Minnegasco Comments to Draft Comprehensive Management Plan and Environmental Impact Statement, Mississippi National River and Recreation Area, Minnesota.

Dear Ms. Kyral:

I am writing on behalf of Minnegasco to provide comments to the above-referenced draft plan (Plan) and Environmental Impact Statement (EIS) for the 72-mile Mississippi National River and Recreation Area (MNRRA) corridor through the Minneapolis/St. Paul metro area. We respond in our capacity as a commercial property owner along the Mississippi River in Minneapolis. I am faxing this comment letter to meet the 11 October (holiday) deadline and will follow up with a hard copy by courier. Our comments, summarized below, are presented as general concerns and recommendations.

1 1) **The overall draft Plan/EIS is too general and vague in its findings and recommendations.** The goals and visions of the Plan are far-reaching. Minnegasco is concerned that the MNRRA Commission (Commission) and the National Park Service (NPS) are attempting to undertake too much, and that the specifics and the related costs associated with implementing the proposed plan have not been adequately considered and calculated for public review. We question the document's ability to meet the requirements set forth in the "Plan" section (703(i)) of the MNRRA enabling legislation (Public Law 100-696, 11/18/88). The remainder of our comments provide more specific examples of this overriding concern.

2 2) **The Commission did not adequately undertake a comprehensive and detailed assessment of existing regulations and programs, their effectiveness, and the entities administering them to develop specific Plan recommendations accordingly.** The Plan commends the residents and communities of the metro area for the existence of policies, plans, and regulations that protect the Mississippi River (River). It states on page 2 that "the river corridor remains a remarkably natural retreat in the midst of a major metropolitan area," due largely to these existing efforts, which have resulted in considerable public land, impressive existence of native plant species, an extensive recreational trail system, etc. The Plan later

201 South Seventh Street
Minneapolis, MN 55402

1. The plan was revised to add some specifics for the other issues discussed in this report. Added text explains that this is a comprehensive plan that is not intended to provide all the details individuals might like to see. Much of this detail would require more work with the partners, and elements need updating more frequently than is feasible with a comprehensive plan.

2. See responses to comments B-10-3 and B-12-4.

implies (on page 79) that there has been little coordination or communication in these efforts.

It appears that the Commission and the NPS are being quick to criticize existing state and local efforts, without adequate review, in their quest to develop a new management plan for the corridor. Minnegasco would like to see the Commission complete a comprehensive review of these existing programs in order to meet their obligations under Section 703(i) of the MNRRA enabling legislation (Act).

3

3) **Significant related past studies and programs are not referenced in the Plan.** Minnegasco is disappointed to find no reference to the landmark study completed for the Metropolitan Council in 1969 under the direction of land-use guru Ian McHarg. This groundbreaking study continues to be touted as the first complete ecological survey of a metropolitan area. It would seem that any current Mississippi River corridor study or plan could benefit *from* what has already been invested in this work.

There is also a lack of references to a variety of past efforts by the University of Minnesota, community Park and Recreation groups, the individual counties in the corridor, etc. The Plan does reference the State Statute that formally redesignated the Mississippi as a state critical area in 1991 (page 80), and finds fault with implementation of a related program, but does not provide either an assessment or status of such a program.

4

4) **It is a duplication of effort, and therefore a waste of public funds, to have the Commission and the NPS undertake the task of streamlining existing permits and regulations.** The Minnesota Governor's office has been working on this very same complex and cumbersome task for the past several years. No reference is made within the Plan to any of the activities or reports of CORE, the Governor's Commission on Reform and Efficiency, which has had a lead role in this endeavor. The Commission and NPS would no doubt be more than welcome to provide input to this existing effort rather than launching a new and separate one of their own.

5

5) **What jurisdictional authorities will prevail, and under what circumstances, once a final plan is drafted and implemented?** The Plan states that the NPS is prepared to help fund the MNRRA-related efforts of existing state and local governments, but in doing so it appears that the NPS reserves the right to comment on all undertakings of these government entities under the Plan. Will this result in NPS having ultimate

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3. Additional references were added (such as the River Crossing Study). The plan emphasizes corridor-specific studies and does not reference the plethora of studies that exist for the entire metropolitan area, such as the McHarg study.

4. This is a major reason why the strategy in the MNRRA plan was proposed. This includes using the recently initiated state efforts before launching new efforts.

5. Existing approval authorities would continue; review processes have been clarified in the final plan.

jurisdiction over the entire MNRRA corridor? Minnegasco recommends that the exact extent of NPS jurisdiction in these matters, as well as during general conflict resolution of future issues under the Plan, be determined and drafted for public comment.

6 6) **Environmental concerns and pollution problems along the corridor are not adequately addressed.** Additionally, there does not appear to be a provision in the draft Plan to do additional assessment. These items will probably come up during the implementation of every aspect of a corridor plan such as the one proposed. It raises the question of jurisdiction over existing environmental contamination and Superfund sites identified within the MNRRA corridor. Acknowledgement of these issues, as well as a determination of the jurisdictional authority over affected properties, needs to be included in the Plan.

The Minnesota Pollution Control Agency (MPCA) is noticeably absent from the Plan, except for their "lead role to clear away waste and debris along the shoreline" (page 39). Unfortunately, the reality that the Commission and the NPS need to understand, is that pollution problems along the River are literally present to a far greater depth and complexity than currently represented in the Plan.

7 7) **The environmental impact assessment (EIS) process hinges on the ability to adequately compare alternatives.** Minnegasco is concerned about the admitted "incomplete development of Alternatives" (page 87). The reasons given for this deficiency on page 87 provide considerable insight into what is perhaps the overall deficiency of the Plan: "Due to the conceptual nature of the proposal and the extensive reliance on cooperation for the MNRRA plan, alternatives cannot be developed in great detail at this time." When will detailed alternatives be developed? Minnegasco maintains that this will not be possible until existing programs and jurisdictional conflicts are addressed and the specifics are incorporated throughout the Plan. Until then, the document and the MNRRA effort will remain too conceptual for acceptance by the River community they are designed to serve.

8 8) **The NPS should focus their involvement with a Mississippi River corridor project in the area of "Visitor Use and Interpretation,"** as detailed on pages 49-74 of the Plan. It is apparent from reading the draft document that this represents the area of expertise of the NPS, as this is the most clearly drafted portion of the Plan.

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6. Additional text was added to the plan to address these comments. The National Park Service and the commission believe that level of effort documented in the environmental impact statement is considered adequate for a comprehensive management plan. Additional assessments would be carried out in follow-up work.

7. The plan did not say that there was an "incomplete development of alternatives." It said that the elements in common with the proposed action would not be repeated. The final plan was clarified to state that due to the conceptual/policy plan nature of the document, all alternatives, including the proposed action, could not be developed in great detail.

8. This is a major role of the National Park Service in the plan, but it would not meet the letter or intent of the MNRRA legislation if the National Park Service restricted its involvement to this area.

Minnegasco recognizes the willingness of the Commission and the NPS to work with existing agencies and businesses as critical to the success of the MNRRA effort. We appreciate your serious consideration of our comments, and look forward to reviewing the next draft of this Plan/EIS document.

Please direct future correspondence concerning this project directly to Janet Rowe, Principal Environmental Specialist, Minnegasco, 201 South Seventh Street, Minneapolis, MN 55402. If you have questions or wish to discuss Minnegasco's comments further, don't hesitate to call Janet at (612) 342-5137.

Sincerely,

Janet M. Rowe
Principal Environmental Specialist

JMR/ap
MNRRAEIS.NPS

cc: Karen Studders Lampert, Minnegasco

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FRED J. CORRIGAN
Executive Director
JERRY ANDERSON
Assistant Executive Director

THE MINNESOTA TRANSPORTATION ALLIANCE

HAND DELIVERED

October 11, 1993

JoAnn Kyral, Superintendent
Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418
P.O. Box 41
Saint Paul, Minnesota 55101

RE: DRAFT COMPREHENSIVE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT

Dear Superintendent Kyral:

The membership of The Minnesota Transportation Alliance represents those interested and responsible for the development and maintenance of the transportation infrastructure in Minnesota and as such has been intimately involved with the Mississippi River as a primary transportation corridor since the founding of our association in 1893.

Our members support the continued enjoyment, protection and multiple use of the river and supported the request that went to Congress in 1986 from the Metropolitan River Corridors Study Commission (MRCSC). That study recommended a national designation for the corridor, federal matching funds for completion of the existing trail plan and coordination and consolidation of governmental regulations in the area.

1 The draft Plan has not adequately recognized transportation issues regarding the relationship between the activities within the designated river corridor and the region's transportation systems, as defined by the Metropolitan Council and including waterways, railroads, airports and streets, highways and bridges. Furthermore, the draft Plan does not acknowledge transportation's integral role in Minnesota's economic success in the global economy.

2 The draft Plan is inconsistent with the legislative history, intent and the "findings" of the law (P.L.100-696). The draft Plan contains programs and policies that go far beyond the request from Minnesotans, the original intent of the law and the law itself, by creating additional levels of bureaucracy and attempting to grant powers not authorized under the law.

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1. The final plan was revised to acknowledge the importance of transportation in the area and the interrelationships among vhe various transportation modes.

2. The National Park Service and the commission believe that the MNRRA plan is consistent with the legislative history, intent, and findings in the law.

Superintendent Kyral
October 11, 1993
Page Two

3 The Minnesota Transportation Alliance supports the statements concerning transportation issues in the corridor presented to you by the Minnesota Department of Transportation, the Upper Mississippi Waterway Association and the Metropolitan Council and its Transportation Advisory Board. While the draft Plan has attempted to address the barge issues on the river, it has not adequately recognized the intermodal activities in the corridor, most obvious in the Plan's total ignoring of rail services. Specifically, the Alliance does not feel the Plan is consistent with the federal Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991 and its emphasis on intermodalism and regional and local control of federal investments in transportation. ISTEA endorses the authority of Metropolitan Planning Organizations (MPO), represented in the Twin Cities by the Metropolitan Council. The Plan states that "communities in the corridor would incorporate the policies articulated below when updating their plans." "State legislation would be sought to require community plans to be updated to conform to this plan." (page 24). The Alliance believes that the Metropolitan Council and its Transportation Advisory Board should continue to develop transportation policy in the corridor and the metropolitan area as part of the comprehensive planning process currently in effect and without additional state or federal agency involvement. Continued cooperation should be a part of that process, including Metropolitan Council participation in MNRRA planning.

4 The Alliance further believes that endowing the National Parks service with even limited powers of eminent domain or authority to recommend sanctions of federal funding for Plan violations is inconsistent with federal ISTEA legislation. The Plan seeks to "evaluate noise standards and sources, including levels of commercial and recreational boat traffic on the river and vehicular traffic on parallel roads and bridge crossings. Improve standards, education mitigation and enforcement if they are determined inadequate." (page 40, #8) "Advocate an accelerated conversion to double-hull barges and encourage efforts to reduce the potential for spills from rail cars and tanker trucks carrying hazardous cargo through the MNRRA corridor. (page 40, #11); and "review federal regional air quality permits to assist in preventing further deterioration of the corridor's air quality from pollution sources inside and outside the MNRRA boundaries." (page 41, #20) The Alliance believes current federal and state law provides adequate authority in these areas without adding the National Parks Service and powers of recommended sanctions of federal funding that could threaten transportation projects in the MNRRA corridor and statewide.

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3. These were addressed in the final plan (see responses to the referenced letters).

4. The National Park Service and the commission disagree with this comment. Also, the MNRRA legislation reference to acquisition and development grants is specific on these issues and would take precedence over general legislation. The National Park Service does not have the authority to prohibit federally funded transportation projects.

5. Current federal and state law would not change per the final plan.

Superintendent Kyral
October 11, 1993
Page Three

6 The Alliance is very concerned with the definition of the term "scenic parkway road design" (page 29, #17: appendix C, design guidelines). Roads and railroads provide the critical links to intermodal facilities serving the barge traffic on the river. To "avoid construction of new roads and utilities within 300 feet of the shoreline" and to "limit roads within 300 feet of the river to scenic drives and parkways" would effectively eliminate intermodal connections in the MNRRA corridor. The Alliance is also concerned about the source of funding for architectural treatments of bridges in the corridor in a period of constrained transportation funding.

The Alliance appreciates the opportunity to comment on the draft Management Plan and would urge the Commission and the National Parks Service to continue to define the transportation elements of the Plan before approving a final Plan. We believe the Metropolitan Council can provide the MNRRA corridor with a comprehensive transportation element to the Plan and is the appropriate body to work with the communities in the corridor to develop, implement and enforce transportation policies developed by the Council.

Yours sincerely,

THE MINNESOTA TRANSPORTATION ALLIANCE

Douglas J. Weiszhaar, Alliance President

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6. The plan was revised to address this concern. See response to comment G-30-7.



PADELFORD PACKET BOAT CO., INC.

Wharfboat Office • Harriet Island • St. Paul, Minnesota 55107
Phone: (612) 227-1100
FAX ONLY: (612) 227-0543

September 21, 1993

JoAnn M. Kyral, Superintendent
Mississippi National River & Recreation Area
175 Fifth St. East, Suite 418, Box 41
St. Paul, MN 55101-2901

Dear JoAnn:

The Padelford Packet Boat Company Inc. is very pleased with the work and effort of so many diverse groups who have contributed to the Comprehensive Management Plan Environmental Impact Statement.

We have gone over the Plan page by page. Our comments are attached along with suggestions that we feel are important to the betterment of the 72 mile corridor.

Our firm has worked tirelessly for the past 24 years to upgrade the public's concept of the Mississippi River as it runs through St. Paul and Minneapolis. Most of this time we have been a lone voice. Over two million passengers have ridden our boats during the past 24 years.

We are excited to have the National Park Service involved as a leader to further the cause.

With kindest personal regards,

Capt. William D. Bowell, Sr.
President

Enclosures

Padelford Packet Boat Co., Inc. Review of Comprehensive Management Plan Environmental Impact Statement.

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Presentation made to the St. Paul City Council on May 22, 1992 regarding the Padelford Packet Boat Co. and its value to the city.

Brief history of the Padelford Packet Boat Co., Inc.

Padelford Packet Boat Co. St. Paul Historical Narration

Padelford Packet Boat Co. Minneapolis Historical Narration

Map showing historic sites in both Minneapolis and St. Paul

Photocopy of Mormon brochure on Sculpture Garden to Women

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PADELFORD PACKET BOAT CO., INC. REVIEW
OF COMPREHENSIVE MANAGEMENT PLAN
ENVIRONMENTAL IMPACT STATEMENT

The Padelford Packet Boat Co., Inc. staff reviewed the Comprehensive Management Plan Environmental Impact Statement carefully and wishes to make the following page-by-page comments:

We agree with the "proposed plan" on Page VII in every instance but two:

PAGE VII
EXCEPTIONS:
1. Land Use/Landscape:
Character Concept
We agree with alternative "C"

2. Barge Fleeting Areas:
We agree with alternative "B"

1	PAGE 2 PARA #3	The Mississippi River has been a working river for over 200 years. The first settlement in the Mississippi Valley was the Iberville settlement at Biloxi in 1699. Keelboats and flatboats plied the river a long time before steamboats arrived at New Orleans in 1812.
2	PAGE 4 PARA #6	Barge fleeting rules should be more stringent and disciplined in the 72 mile corridor. Policing of the rules regarding safety lights and number of barges allowed side by side in a fleet should be enforced. They are currently pretty much ignored.
3	PAGE 9 PARA #3	This year we were surprised to see an unusual amount of marine growth on one of our metal paddlewheels. We attribute the phenomena to the 1993 flood and the amount of agricultural run off that came down the Minnesota River.
4	PAGE 9 PARA #3	We are also concerned with ugly looking affluent from a barge cleaning operation up river. This is residue that is washed out of chemical or grain barges and dumped into the river. It turns into an unsightly brownish debris laden foam floating on the surface. We are embarrassed to have our boarding passengers see it.
5	PAGE 10 PARA #4	A national heritage corridor for the entire Mississippi River in the eyes of an unbiased observer must be accepted as a good idea. It would be our gift to future generations. But it must be phased in carefully so that river industry is not overly hurt.
	PAGE 13 PARA #3,4	Pleasure boater operators are not licensed and are often inexperienced in the use of their boats. Towboat operators are licensed and in most cases well trained. The 72 mile

1. The plan recognizes that the Mississippi is a working river and has been for may years. Additional recognition was added to the final plan.

2. This is a detailed commercial navigation management comment that is beyond the scope of the MNRRA comprehensive plan. The National Park Service does not have the authority establish or enforce barge fleeting rules and regulations.

3. Water quality is identified as a major concern in the MNRRA plan.

4. The MNRRA plan says the follow-up resources management plan would address these issue.

5. The subject designation is under study by a separate commission. National heritage corridors are not considered affiliated areas or units of the national park system.

6 corridor should require towboat operators to take a special sensitivity course acknowledging the difference between pleasure craft and commercial craft operators.

Many towboat operators take more of an offensive attitude toward pleasure boaters rather than the protective attitude that should be taken.

7 In addition serious consideration should be made to curtail towboat traffic on weekends in congested areas of the river.

In general, there should be special operating rules in the 72 mile corridor for both towboats and pleasure craft.

PAGE 25 Utilities--
One of the most beautiful sections of the Mississippi in the St. Paul area is just above Ft. Snelling. Unfortunately the marvelous incomparable beauty is marred by ugly electrical high line towers right on the river bank. The towers run up river through Hidden Falls Park. This is also true of Boom Island Park.

8 Priority should be given to getting Northern States Power to go underground with their high lines along the river.

PAGE 24 The outstanding job that the city of Minneapolis and their park department achieved in implementing a parkway above the St. Anthony Locks should be studied. It is an example of what can be accomplished in a short span of time and should be a model of what other cities can do.

9 It is a direct contrast to St. Paul which has gone through innumerable commissions and committees and proposals but accomplished nothing.

PAGE 25 Item #2 at top of page.

10 Our company is seriously considering bringing the canoe rental business back to the Twin Cities.

This past year we were able to secure an agreement with the Anoka County Park Department to launch canoes just below the Coon Rapids Dam. Canoeists will be able to float or paddle 12 miles down to Boom Island. This section of the river is beautiful, wild and interesting. Very few people have traveled or seen it.

The difficulties of providing a continuous trail system along the river banks in the area from Coon Rapids to St. Paul makes the availability of a professional canoe rental operation all the more desirable.

Canoeists will park their cars at Boom Island and we would transport them and the canoes to Coon Rapids by van and

6. This level of detail is beyond the scope of the MNRRA plan. The plan does generally promote safety education for all users in the MNRRA corridor.

7. These concerns would be considered by the involved agencies during preparation of follow-up plans and management for the corridor.

8. A policy was added to the Land Use section promoting the placement of utilities underground where practical in new development and encouraging the replacement of existing utilities underground where possible in existing development.

9. The general history of riverfront improvement in St. Paul is acknowledged in the plan.

10. Canoeing is an encouraged activity in the plan.

COMMENTS

trailer.

We expect we would have a similar operation from Shakopee on the Minnesota River to Harriet Island, St. Paul. Also destinations down river from St. Paul with routes through the sloughs and back waters away from commercial or other river traffic.

11 PAGE 26 PARA #5 Residential or any other type of building above the I-694 bridge at Fridley should be discouraged and the area should be kept wild and natural as it is in its current state. This area is much like the St. Croix above Stillwater and should be kept that way! The same is true of the area below the Inver Grove swing bridge. It is wild and scenic and commercial growth should be absolutely forbidden.

PAGE 28 PARA #6 The Padelford Co. conducted riverfront cleanup programs in both Minneapolis and St. Paul last year with great success. We had intended to repeat the program in 1993, but high water disrupted that plan. We stand ready to work with NPS in this effort in the future.

12 PAGE 37 Some means should be worked out to properly light fleeted barges. Currently the outside barges are required to have a white light on the outside bow or stern of the barge. If the barges are unloaded, the light is 10 to 12 feet above the eye level of a recreational boater. This has been responsible for some serious boating accidents. Some means should be devised to lower the light or have another light on the barge at the eye level of the recreational boater.

PAGE 39 Pollution—there should be a positive requirement that any marina allowing live-aboards should have a piped-in sewage system. The affluent should go to the city sewage system. An alternative would be a USCG approved type I or II system as currently marketed by Microphor.

13 A dumping station at all marinas is an absolute necessity and marinas should be required by law to report any mechanical problems that make the pump inoperative. Unfortunately, there are boaters with holding tanks who are pumping overboard.

PAGE 55 A concerted effort should be made to promote the cleanliness and beauty of the Mississippi.

There are a few negative organizations that obtain funds by knocking the Mississippi and its pollution. This should be discouraged. The river is currently the cleanest it has been since 1922.

The culiform count compares favorably with the St. Croix River in many areas of the river as it runs through the Twin

RESPONSES

11. Most of this area is zoned or platted by local governments. While some interested parties would consider it desirable to preserve this land as open space, extensive land purchases would be required. The approach recommended in the final plan is to attempt to make the residences less visible from the river by maintaining vegetative cover along the shoreline and bluffs and by encouraging adequate building setbacks and height limits.

12. This is beyond the scope of the MNRRA plan. See response to comment B-18-2.

13. A policy on dumping stations is included in the plan. The reporting requirement is beyond the scope of this plan.

daily excursion trips are narrated. They cover basic historic facts about St. Paul and Minneapolis. Copies of our Minneapolis and St. Paul narrations are attached.

PAGE 60 ALSO PAGE 235 — For the past 24 years the Padelford Packet Boat Company has spent $2,500,000 in advertising promoting Harriet Island as an excursion boat landing.

14 — We would not feel too happy if the NPS put a competing tour boat on Harriet Island as stated in paragraph #7, PAGE 60.

PAGE 65 — MNRRA Interpretive Facilities
Under Nearby amenities—Minneapolis add tourboat.

PAGE 67 PARA #1 — The Minneapolis Park Board has under consideration the possibility of moving our Boom Island excursion boat operation to the old Shiely Dock between the upper and lower St. Anthony locks. We are outgrowing Boom Island which has limited parking. You may want to keep this in mind when locating the Minneapolis Interpretive Center.

15 — PAGE 69 — The location of the interpretive center behind the levee would be a mistake.

The center should be closer to the river which is the very object it is interpreting.

It would be possible to put a jog in the levee where the center would set.

A system of gates could be designed so as to protect the center in times of the rare flood.

The posts that hold the gates could easily be part of the design. The gates would be stored away from the site until needed.

PAGE 72 — A new picture should be taken as this photo is hardly representative. Possibly show the excursion boats and the masses of automobiles and people they attract.

16 — PAGE 111 — Minnesota River to Shakopee should be included in the corridor!

PAGE 124 — Ft. Snelling was originally called Ft. St. Anthony. The name was changed by Gen. Winfield Scott in 1824 and approved by Congress in 1825.

PAGE 125 — First steamboat to arrive at the fort was the "Virginia."

- 4 -

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14. A competing tour boat is not proposed in the MNRRA plan. The subject boat would be used for educational programs.

15. To comply with federal policy, the facility must be out of the floodplain, which in this area requires the location behind the levee. Visual and pedestrian connections are emphasized in the development concept plan for the area and will be further stressed during project design in cooperation with the city of St. Paul.

16. Extending the MNRRA boundaries as suggested by the comment would require an act of Congress and is beyond the scope of the comprehensive management plan. The suggested area is already a federally designated national wildlife refuge, and adding it to the MNRRA corridor would complicate management and create overlapping jurisdictions for the two primary federal agencies. This would conflict with the legislative intent for the Mississippi National River and Recreation Area.

COMMENTS

Date was May 10, 1823.

We have a painting of the "Virginia" landing at Ft. St. Anthony if you want to use it for illustration. It is the only historically accurate rendition of the boat.

PAGE 133 — The saturation of the St. Croix River by recreational boaters is leading to increased use of the Mississippi from Minneapolis to Red Wing.

PAGE 134 — Padelford spelled incorrectly in 2nd paragraph.

17 PAGE 135 — Padelford Packet Boat Co. has to be considered with the towboat companies as a supplier of jobs. Our payroll is in excess of $750,000 a year.

PAGE 144 — A careful survey should be made of the river in Minneapolis above the Camden Avenue Bridge. This area cannot be traveled safely by motor boats as it is too shallow. It is also very rocky.

It may be possible to find a channel through the river. If this is possible. The channel could be buoyed so that motor boats could use the area.

18 Motor boats launched at Boom Island can safely navigate only 3.6 miles between the upper St. Anthony Lock and the Camden Avenue Bridge which is the end of the navigable channel.

19 PAGE 211 — With a new bridge being considered to replace the Wabasha Street Bridge in St. Paul the statement under Bridges, Power Lines and Roads becomes very important and I most emphatically agree with the statement.

20 PAGE 214 — The Padelford Packet Boat Company is not listed.

ADDITIONAL NOTES:

21 1. At the mouth of Minnehaha Creek where it meets the Mississippi there is a nice little walking bridge that crosses the creek. Usually it needs paint and repair. This area is a popular fishing area as it is located about 150 yards below Lock One.

Unfortunately, this beautiful, historic area is blighted by a huge concrete monument which decimates the beauty around it. The concrete forms a towering opening which is a storm sewer.

This edifice is a callous monument to that period when man did not concern himself with respect for the Mississippi. It should be a priority to arrange to get rid of it.

2. We have a national program whereby groups or individuals adopt a highway

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RESPONSES

17. The document recognizes the diverse nature of employment in the corridor, including the contributions of tourism to sustainable use of the area.

18. The document was revised to say "canoes and other small boats."

19. This policy is retained in the draft final plan but has been revised to address several related comments.

20. The subject list includes the designated work group members only.

21. This is a site-specific issue beyond the scope of the MNRRA plan. The plan does support shoreline restoration projects.

or a section of it.

22 We should have the same arrangement on the river. Volunteers should be encouraged to adopt an area of the river. They would see that banks are kept clean of foreign matter and would report to the city, county or state problems that exist and need to be corrected.

The Padelford Packet Boat Company would be happy to organize such a group with the help of NPS.

These volunteers would also assist the US Coast Guard, DNR and other city, county or state organizations working on the river.

3. The Interpretive Center is contemplating a library.

It would be entirely feasible that the library would emphasize the Mississippi River. It then makes sense that their collection of books would be primarily about the river.

23 It is possible that at some future date I would consider giving my collection of Mississippi river books to the NPS library. The collection presently number 1,200 volumes.

There is also the possiblity that if the collection is not given to NPS it still could be microfiched for use by researchers and scholars there at the Interpretive Center.

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24 4. We are concerned about current developments in the St. Paul harbor. The proposed Boom levee and park development has been designed and is being implemented without any input from us or even advisary information during the process. The project has been prepared without public review. We are concerned that such a development truly accommodates all public concerns, not merely those few, select special interests who were directly involved in preparing the plan.

25 5. We would consider installing and operating a medium gauge passenger train or street car that would run along the river from Harriet Island to the city of Mendota.

The cooperation of the various political entities would be necessary to obtain the land along the river for the tracks. This project could be a cooperative effort with the Minnesota Transportation Museum.

There is also the possibility of an old-fashioned cable ferry to take the train passengers from Mendota to Ft. Snelling.

26 6. In 1983 I presented the concept of a sculpture garden of history to Russell W. Fridley, Director of the Minnesota Historical Society.

The plan was rather simple. In an area close to the Padelford Landing, a "Garden of History" could be developed.

22. This idea should be pursued during plan implementation. The Department of Natural Resources has an adopt-a-river program that could serve this purpose.

23. The National Park Service appreciates this kind offer. A collection of valuable books should be treated with special storage and handling procedures. This idea is beyond the scope of a comprehensive management plan but could be evaluated further during plan implementation.

24. This is a site-specific issue beyond the scope of the MNRRA plan. The commenter should address these concerns directly to the Corps of Engineers or the city of St. Paul.

25. This proposal is beyond the scope of the MNRRA plan and would need to be approved by the city of St. Paul.

26. This proposal is beyond the scope of the MNRRA plan and should be shared with the city of St. Paul.

The "Garden of History" would be a series of bronze, life-like statues of important people in Minnesota history. The "Garden of History" would draw on Minnesota artists for the creation of the statues. Perhaps in competition. We could be working on five or six statues at a time. Each by a different artist.

The "Garden of History" could be a tremendous tourist attraction and a highly compatible addition to Harriet Island.

It is my personal feeling that the first series of statues include the following:

Pig's Eye Parrant
Josiah Snelling
Abigail Snelling
Harriet Bishop
Governor Ramsey
Governor Sibley
Father Lucian Galtier
Zebulon Pike
Major Laurence Talliaferro
Dred Scott
Little Crow
Jean Baptiste Faribault

All of these people have had a close relationship with the river and this area. There are many more people who could be added to the list.

Floyd B. Olson
Hubert H. Humphrey
Sinclair Lewis
James J. Hill
F. Scott Fitzgerald
Doctors Mayo
Wm. W. and Sons
Wm. and Charles
Charles A. Lindberg
Ignatius Donnelly
Jeanette Piccard
Seth Eastman
John Ireland
Roy Wilkins
Frederick Weyerhauser

My concept for the "Garden of History" was inspired by the Mormon's tribute to the "family" at Nauvoo, Illinois. A photocopy of their brochure is attached.

The plans for Harriet Island NPS Interpretive Center include a long walkway to the river and the river walk. These sculptures could line the walkway with small individual gardens for each statue.

Padelford Packet Boat Company would donate the first statue "Pig's Eye" to the city. We would help in whatever way we could to promote the gifts by other corporations of additional statues!

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COMMENTS

minnesota farm bureau federation
1976 Woodddale Drive, P.O. Box 64370, St. Paul, MN 55164-0370
Phone (612) 739-7200 Fax (612) 739-5361

October 12, 1993

Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418, Box 41
St. Paul, MN 55101

Attention: Superintendent

Thank you for this opportunity to comment on the Draft Comprehensive Management Plan for the Mississippi National River and Recreation Area (MNRRA).

Minnesota Farm Bureau Federation is Minnesota's largest general farm organization. We are a non-profit organization representing 35,000 family members located throughout the state of Minnesota.

The Mississippi River provides a critical transportation link for Minnesota farmers. In 1992 Minnesota farmers exported $2.14 billion worth of agricultural products, 30% of the total cash receipts farmers reported for 1992. Feed grains and soybeans alone accounted for $1.24 billion of the total exports. A large portion of ag exports are shipped down the Mississippi River.

We are pleased that Congress directed the commission to consider "the commercial use of the area". However, the commercial use must be "consistent with the protection of the values for which the area was established". In the executive summary page v it states "decisions about commercial navigation uses would be based on resource values, emphasizing minimal impact on aquatic life". It is very disheartening to see that "minimal impact on aquatic life" is a higher priority than the economic survival of Minnesota farmers, who contributed over $6 billion to Minnesota's economy in 1992 alone.

1

We feel any MNRRA management plan needs to treat the economic importance of the river on an equal if not higher priority than all other factors. The impact this plan could have on the economy of the river, including, but not limited to the shipment of agricultural products, must be considered before any part of the plan is put into place. This needs to be clearly spelled out in the plan.

2

Another high priority of our members is the protection of private property rights and local government control. To that end we see many discrepancies throughout the draft comprehensive management plan. On page 18 of the draft plan it states "land use regulation, including zoning and site plan approval, should continue to be primarily controlled at the local government level." Page 78 states "local control of those authorities (local governments) would be retained." The next statement is of major concern to us, "State legislation would be sought to require that local planning and actions be consistent with this plan." How is this local control?

3

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RESPONSES

1. The statement on commercial navigation decisions was revised to reflect all resources in the MNRRA legislation.

2. It would be inconsistent with the legislation to make the economic importance of the river a higher priority than other factors. All resources are fully considered in the plan and would be treated according to their identified resource value. All factors would be given due consideration during plan implementation. The economic impact of the plan was considered extensively by the commission and the National Park Service during plan development.

3. The proposal for state legislation was dropped.

As we read the draft plan, it appears your definition of local control is that local units of government and landowners must conform to this plan. Without the power to decide what rules and regulations, if any, to put in place, you do not have local control. Local control means the right to make local decisions.

4 Page 9 of the draft plans states "the primary nonpoint source pollution input is from agricultural runoff outside the corridor in the Minnesota River." On what scientific study is this assumption based? Nonpoint source pollution comes from various sources - parking lots, urban lawns, city streets and sidewalks just to mention a few. What method was used to identify the source of nonpoint pollution along the Minnesota River. Unless it is clearly and scientifically proven that agriculture is the "primary" source we do not feel this statement should be included in the plan.

5 The draft plan refers to the fact that local governments would "acquire and develop parkland and build trails" (page 78). There is no indication how local governments are to fund this acquisition and development. Nor is there any mention how landowners are to be compensated if their activities are inconsistent with the draft plan. These issues need to be addressed in the plan.

In summary, we have some real concerns about the concepts proposed in this plan. Especially in light of what we find in paragraph 3 page iii of the summary - **"For many years the people of the Minneapolis/St. Paul metropolitan area have managed the resources of the Mississippi River corridor as it runs through their cities. This management has preserved the river in good condition so that people want to live near its banks and businesses choose to locate near its shores."**

If, in your own words, the management of the river by the people who live along it has resulted in the river being in good condition - what will this plan accomplish that is not already being done?

Sincerely,

Chris Radatz

Chris Radatz, Director
Marketing & Commodities

c: Al Christopherson
G. W. Hagaman
Vern Ingvalson

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4. This is a commonly understood condition and is supported by MPCA staff.

5. The plan says funding would be sought for 50% federal grants, plus state and local sources. Lands eligible for the grant program would be determined by the local government in consultation with the National Park Service. Landowner compensation for local activities would be according to state and local law.

Mississippi River Ag Coalition

1401 Eye Street, N.W.
Suite 340
Washington, D.C. 20005

Telephone: (202) 371-9279
Facsimile: (202) 371-9169

October 21, 1993

Ms. JoAnn M. Kyral
Superintendent
Mississippi National River and Recreation Area
U.S. National Park Service
175 East Fifth Street
Suite 418
Box 41
St. Paul, Minnesota 55101

RE: *Draft Comprehensive Management Plan*

Dear Superintendent Kyral:

We represent national farm organizations, commodity groups and companies that have two things in common - agriculture and the Mississippi River. We are writing to you to express our strong opposition to the "Draft Plan" for the Mississippi National River and Recreation Area (MNRRA). As proposed, the Draft Plan would have a devastating impact on agriculture in Minnesota and the neighboring states of North Dakota, South Dakota and Wisconsin.

We are convinced that the current plan for the Mississippi National River and Recreation Area would be a disaster for agriculture, would seriously disrupt barge traffic and other modes of transportation on which agriculture depends, and would result in unacceptable job loss throughout the "Northern Tier" area. This plan simply must not be implemented in its present form. There can be no denying the fact that the Mississippi River and its tributaries constitute a vital artery of commerce -- important both to the State of Minnesota and to the Nation as a whole.

1 What is entirely lacking in the plan is an honest and thorough economic assessment prepared with the help of those sectors of the economy most directly affected, which objectively considers all of the economic issues involved and weighs the benefits against the costs. The so-called "MNRRA Economic Impact Analysis," prepared last December hardly fits the bill. It appears to have been hastily put together with one main objective - to try to turn the clock back on economic development along the Mississippi River, regardless of the human costs. Enclosed with this letter is our analysis of the importance of agriculture to Minnesota and the region. Agriculture is a critical factor to the economic well-being of this region.

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1. See response to comment G-46-3.

2. Text was added to the plan stressing the importance of agriculture to the Minnesota economy. Data provided by the Minnesota Department of Agriculture to support this was added to the document.

Concerns With the MNRRA Proposal:

1. **Potential Barge/Fleeting Restrictions**

3 • While the Plan recognizes existing barge use and fleeting zones as "consistent" uses of the river, there are potential conflicts. For example: any increase in barge traffic might conflict with proposed recreational or environmental requirements; limits may be imposed on the times when barges could move; and, "no-wake" zones might affect barge speed and the size of the barge tows.

• Because of demand and price fluctuations affecting commodity industries, we must retain the flexibility to move more product when economic forces dictate. In addition, a natural disaster or mishap affecting one leg of the transit system might mean increased reliance on the other. The Plan should not act to hamper access by barge or rail to facilities located within the MNRRA corridor or barges that must move through the corridor to reach points north or south of this area.

4

• An artificial constraint that affects river usage, could seriously impair commodity industries' ability to quickly and efficiently respond to changes in the volatile commodity marketplace. The grain and fertilizer industries are known for their unpredictable business cycles. These cycles can be caused by a number of factors, many of which are outside industry control and which greatly affect demand for the various products. For example:

- **Weather conditions** may affect the ability and economics of fertilizer applications and may influence the quantity and form of fertilizer which is applied by the farmer.

- **Global demand** for grain, itself a function of economic and political conditions in the world, greatly influences U.S. grain prices and ultimately affects farmers' planting and fertilizer decisions.

- **Global and domestic policies** in such areas as energy, agriculture, trade and the environment exert a strong influence in the grain and fertilizer markets and can suddenly affect planting decisions.

In addition to the volatility inherent in the grain and fertilizer marketplaces, these industries must contend with a number of complications, some of which are unique to this river segment. These include:

- **Long transit times** to traverse the river, requiring significant advance planning effort. For instance, under ideal conditions, the time to deliver phosphates from a Florida manufacturing facility to a warehouse in the MNRRA corridor is between 30 and 35 days.

- **Normal wintertime ice conditions** that cause this river segment to be available for only eight months out of the year. A great deal of coordination and

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3. These would be analyzed in the surface water use management plan and any additional regulation would be established by local governments.

4. The plan is not intended to hamper access to points north or south of the area.

planning is required to maximize utilization of business assets in the marketplace given this constraint.

- **Extreme weather cycles** which further reduce the availability of the river to commercial navigation. The flood of 1993 is one example. As recently as 1988, drought conditions also severely limited use of the river system.

2. Land Acquisition

5 • The National Park Service has the authority to acquire public and private landholdings for MNRRA projects. However, the Plan provides no specific criteria for determining values of affected property.

Recommendations:

6 1. **Barge Flexibility**
The Plan must provide for flexibility to allow for increases in barge/rail access in the event of greater demand, response to price conditions affecting commodity industries or in reaction to natural disasters.

2. **Economic Impact Statement**
We believe the goals of MNRRA can be achieved without undermining the River's historic economic contribution to the Twin Cities, including future economic growth.

7 The Plan pays inadequate attention to the economic consequences of its proposals. The economic impact statement must be strengthened dramatically before a final decision is made on a plan.

8 3. **Land Acquisition**
We oppose excessive restrictions on the use of private property, including undeveloped acreage. If the government decides to acquire landholdings for MNRRA projects, the Plan should provide specific criteria for determining values of affected property.

In summary, the Draft Plan is unacceptable as currently written. We believe a comprehensive economic impact statement, using up-to-date industry statistics, must be prepared prior to final approval of a plan for the MNRRA corridor. Without such an economic study, the Plan is seriously flawed and could result in severe negative consequences for Minnesota and the Nation's food and agriculture industry.

Sincerely,

American Agriculture Movement
American Soybean Association
Bunge Corporation
American Oat Association
Archer Daniels Midland, Co.
Cargill, Inc.

(continued on next page)

5. The final plan further clarifies that the National Park Service would not acquire land, except for possible minimal amounts as stated in the document. Currently, this is envisioned to include only about 5 acres for an interpretive center in St. Paul.

6. There is flexibility in the plan to allow for increased access.

7. The commission and the National Park Service believe that the economic analysis is adequate. See response to comment G-46-3.

8. The plan was revised to emphasize incentives. NPS land acquisition is not planned, except for the donation of about 5 acres by the city of St. Paul.

CENEX/Land O'Lakes Agronomy Co.
Commodity Specialists Co.
Farmers Union Central Exchange, Inc.
The Fertilizer Institute
Harvest States Cooperative
Land O'Lakes, Inc.
National Agricultural Chemicals Association
National Barley Growers Association
National Farmers Organization
National Grain and Feed Association
CF Industries, Inc.
Continental Grain Co.
Farmland Industries, Inc.
Growmark, Inc.
Honeymead Products Co.
Marc 2000
National Association of Wheat Growers
National Council of Farmer Cooperatives
National Farmers Union
National Grange

c.c./ The Honorable Arne H. Carlson
Commissioner Elton R. Redalen

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October 26, 1993

Ms. JoAnn M. Kyral, Superintendent
Mississippi National River and Recreation Area
U.S. National Park Service
175 East Fifth Street, Suite 418, Box 41
St. Paul, MN 55101

Dear Superintendent Kyral:

We are writing to you on behalf of the Minnesota Corn Growers Association and the Minnesota Corn Research and Promotion Council. As President and Chairman of these two organizations, who collectively represent over 50,000 Minnesota corn farmers, we felt you should know of the negative impact of the "Draft Plan" for the Mississippi National River and Recreation Area(MNRRA). As proposed, the Draft Plan will have a devastating impact on agriculture, and thus the economy as a whole. This impact is not only economic but will effect our way of life throughout all of the Upper Midwest. Agriculture moves with nature and so do the supplies that support it. Many production inputs are supplied most economically to the Upper Midwest on the Mississippi. The same is true with our exports from the entire region.

1 The proposed Draft Plan will disrupt barge traffic and other modes of transportation on which we all depend. These disruptions will ripple back throughout the economy resulting in unacceptable job loss throughout the whole "Northern Tier" area. In it's present form, this Plan is a catastrophic self-inflicted wound, and must therefore not be implemented.

Commodities like corn compete on a world wide bases, for least cost production. Increase the cost and inconvenience of transportation and you reduce the already low price even more. This hurts the economy because every farmer who stays in business generates another 7 to 10 jobs in the other sectors. We see no sound evidence to show either an economic or social assessment for this project. Society would benefit from another park, but to sustain itself, Society must have economic benefits as well. Somehow we must assess the balance in such a way as to not take more steps back than forward.

1. There is no evidence that this will happen. The commenter has not provided adequately specific information to address this concern in further detail.

Please send us notices for all hearings scheduled for the MNRRA. Please file this letter and the following list of concerns with your hearing records.

Concerns With the MNRRA Proposal

1. Potential Barge/Fleeting Restrictions

- While the Plan recognizes existing barge use and fleeting zones as "consistent" uses of the river, there are potential conflicts. For example: any increase in barge traffic might conflict with proposed recreational or environmental requirements; limits may be imposed on the times when barges could move and "no-wake" zones might affect barge speed and the size of the barge tows.

- Because of demand and price fluctuations affecting commodity industries, we must retain the flexibility to move more product when economic forces dictate. In addition, a natural disaster or mishap affecting one leg of the transit system might mean increased reliance on the other. The Plan should not act to hamper access by barge or rail to facilities located within the MNRRA corridor or barges that must move through the corridor to reach points north or south of this area.

- An artificial constraint that affects river usage, could seriously impair commodity industries' ability to quickly and efficiently respond to changes in the volatile commodity marketplace. The grain and fertilizer industries are known for their unpredictable businesses cycles. These cycles can be caused by a number of factors, many of which are outside industry control and which greatly affect demand for the various products. For example:

  -Weather conditions may affect the ability and economics of fertilizer applications and may influence the quantity and form of fertilizer which is applied by the farmer.

  -Global demand for grain, itself a function of economic and political conditions in the world, greatly influences U.S. grain prices and ultimately affects farmers' planting and fertilizer decisions.

  -Global and domestic policies in such areas as energy, agriculture, trade and the environment exert a strong influence in the grain and fertilizer markets and can suddenly affect planting decisions.

In addition to the volatility inherent in the fertilizer and grain marketplaces, these industries must contend with a number of complications, some of which are unique to this river segment. These include:

Long transit times to traverse the river, requiring significant advance planning effort. For instance, under ideal conditions, the time to deliver phosphates from a Florida manufacturing facility to a warehouse in the MNRRA corridor is between 30 and 35 days.

Normal wintertime ice conditions that cause this river segment to be available for only eight months out of the year. A great deal of coordination and planning is required to maximize utilization of business assets in the marketplace given this constraint.

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Extreme weather cycles which further reduce the availability of the river to commercial navigation. The flood of 1993 is one example. As recently as 1988, drought conditions also severely limited use of the river system.

2. Land Acquisition

- The National Park Service has the authority to acquire public and private land holdings for MNRRA projects. However, the Plan provides no specific criteria for determining values of affected property.

Recommendations:

1. Barge Flexibility

The Plan must provide for flexibility to allow for increases in barge/rail access in the event of greater demand, response to price conditions affecting commodity industries or in reaction to natural disasters.

2. Economic Impact Statement

We believe the goals of MNRRA can be achieved without undermining the River's historic economic contribution to the Twin Cities, including future economic growth. The Plan pays inadequate attention to the economic consequences of its proposals. The Plan's economic impact statement must be strengthened dramatically before the Plan is adopted. We also ask that you accurately assess the societal loss due to these economics and consider their impact on the Plan.

3. Land Acquisition

We oppose excessive restrictions of the use of private property, including undeveloped acreage. If the government decides to acquire land holdings for MNRRA projects, the Plan should provide specific criteria for determining values of affected property.

In summary, the Draft Plan is unacceptable as currently written. We believe a comprehensive economic impact statement, using up to date industry statistics, must be prepared prior to final approval of a plan for the MNRRA corridor. Without such an economic study, the Plan is seriously flawed and could result in severe negative consequences for Minnesota and the Nation's agriculture industry.

Sincerely,

Jerry Ploehn, President
Minnesota Corn Growers Association

Henry Mertens, Chairman
Minnesota Corn Research and Promotion Coun

14198 Commerce Ave. NE, Suite 600
Prior Lake, MN 55372

JP/HM/ks

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Minnesota Agri-Growth Council, Inc.
8030 CEDAR AVE. SO., SUITE 213, BLOOMINGTON, MN 55425 • PHONE (612) 854-1665

November 3, 1993

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OSTERGREN
istrative
EARY
Consultant

Ms. JoAnn M. Kyral
Mississippi National River & Recreation Area
U.S. National Park Service
175 East Fifth Avenue 175 East Fifth Avenue
St. Paul, MN 55101

Dear Superintendent Kyral:

The Minnesota Agri-Growth Council seeks to provide a common voice for Minnesota's diverse food and agricultural industry. The organization, made up of producers, farm suppliers, food processors, and allied industries, has been active in issues important to agriculture for more than 25 years.

Agriculture is Minnesota's largest and most critical industry. According to a University of Minnesota study, in 1990 food and agriculture directly accounted for 162,000 jobs in the state. Plus, through labor earnings and purchases of Minnesota-produced inputs, the industry indirectly accounted for 257,000 Minnesota jobs. That same study estimates food and agriculture accounts for 22% of the state's economic base as measured by out-of-state exports – more than any other industry.

1 The Mississippi river is a vital link for Minnesota agriculture, providing efficient and environmentally sound transportation of farm commodities. A large share of Minnesota's grain exports are transported via the river, and fertilizers and other inputs critical to agricultural production are shipped into the state via the river.

The Council fears the Mississippi National River and Recreation Area Draft Plan (MNRRA) could have a significant, negative impact on Minnesota's food and agricultural industry. This past Monday, November 1, the Minnesota Agri-Growth Council held its annual meeting and adopted the following resolution concerning the MNRRA Draft Plan:

WHEREAS, a proposed plan must provide adequate and proper planning for business, cities and homeowners; and

WHEREAS, a thorough economic analysis will provide a sound base for a long term plan; and

WHEREAS, the present complex intermodal transportation system depends on the Mississippi River as a future structure; and

WHEREAS, a plan for the future must provide a review and appeals process; and

WHEREAS, the final plan must meet the original intent of the law; therefore be it

1. This view was added to the General Concept section of the plan.

RESOLVED, that the MINNESOTA AGRI-GROWTH COUNCIL, INC. supports the MNRRA Stakeholders Coalition efforts to include changes and modifications in the plan to address the future needs of the system and meet the intent of the law.

The Agri-Growth Council has exhibited a long tradition in full support of environmental concerns impacting production agriculture and agribusiness, as exemplified by the enclosed environmental resolution which was also adopted at our recent meeting.

Given the importance of agriculture to Minnesota and the importance of the Mississippi river to Minnesota agriculture, the membership of the Agri-Growth Council is extremely concerned that a thorough economic analysis of the MNRRA Draft Plan has not been conducted. Furthermore, it is clear that jurisdictional matters involving local, state, and federal governments have not been resolved.

The Minnesota Agri-Growth Council respectfully requests that these concerns be fully addressed prior to commission approval of the Draft Plan.

Sincerely;

Tom Cochrane
Executive Director
Minnesota Agri-Growth Council

Dave Johnson
President, Agri-Growth Council and
President, Cenex/Land O'Lakes
Agronomy Company

cc: Governor Arne H. Carlson
Commissioner Elton R. Redalen
Commissioner E. Peter Gillette, Jr.
Commissioner Charles W. Williams
Senator Pat Pariseau
Representative Dennis D. Ozment

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ENVIRONMENTAL RESOLUTION
OF THE
MINNESOTA AGRI-GROWTH COUNCIL

WHEREAS, THE MINNESOTA AGRI-GROWTH COUNCIL, INC. shares a concern for the welfare of Minnesota citizens and for the environment in which they live; and

WHEREAS, it is recognized that all citizens of this state desire a wholesome environment; and

WHEREAS, the use of Best Management Practices are reasonable actions to protect the environment, considering social and economic factors in the state's economy; therefore be it

RESOLVED, that the MINNESOTA AGRI-GROWTH COUNCIL, INC. urges the legislature and government agencies to support programs that will enable producers, processors and distributors of processed products to use products and methods based on scientific data which will safeguard agriculture and the environment and provide a reasonable, economic return to the producer and provide quality food at a reasonable price for the consumer.

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Minnesota Petroleum Council

Darrel Bunge, Executive Director
Erin Roth, Associate Director

8 Pine Tree Drive • Suite 260 • St. Paul, MN 55112 • (612) 483-5339 • FAX: (612) 483-6433

Sept. 10, 1993

National Park Service
Ms. JoAnn Kyral, Superintendent
Mississippi National River and Recreation Area
175 E. Fifth St., Suite 418
PO Box 41
St. Paul, MN 55101

Dear Ms. Kyral,

The Minnesota Petroleum Council (MPC) would like to take this opportunity to comment on the Draft Comprehensive Management Plan, Environmental Impact Statement on the Mississippi National River and Recreation Area.

The MPC is supportive of the goal set forth by Congress, the National Park Service (NPS) and MNRRA Commission, to protect the 72 mile segment of the Mississippi River through the Twin Cities area. We believe that the river is vital to the economic vitality of the region and for any final plan to be successful, all stakeholders must play an active role in protecting this precious resource. However, the final plan must recognize the intent of the legislation that this segment is a "working" river. While it may be important to set aside portions of land along the segment for park land and other purposes, the plan must not lose sight of the fact that multiple use of this resource must be preserved and economic development continue, as some groups have stated they oppose.

1

The MPC also endorses the Mississippi Stakeholder's Coalition statement which has been submitted to the NPS. There are some additional concerns contained in the draft which the MPC would like to provide comments on. These include:

1) on page 4 there is reference to a possible stronger federal presence within the corridor. The MPC believes the plan should utilize existing local and state plans to manage the river. Another layer of beaucracy will only lead to duplication, permitting delays and confusion.

2

- more -

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1. There are many references to the working river and many policies that support this concept. While the term "working river" is not in the legislation and has no specific legal meaning, it is a commonly used expression for a concept of management and use that was adopted by the commission as one element for the plan. Additional recognition of the working river was incorporated in the final plan.

2. The plan leans heavily on state and local authorities and has been revised to emphasize this.

2) on page 9 and 10 the plan discusses new economic development and the need to weigh the natural, cultural, and economic resource protection needs. While we recognize that there are areas along the river which should be set aside for cultural and non-development purposes, economic development and job creation within the corridor should continue. Local governments, and not MNRRA, should be the decision maker on whether the economic development proposal is appropriate or not. 3

3) on page 23 and 24 under the Detailed Policies section, the statement regarding expansion of existing facilities should be stricken and rewritten to provide a more realistic approach. There are many facilities, including refineries and petroleum terminals, where easements and adherence to landscape guidelines cannot be met. 4

4) on page 39 under Natural Resource Management, the plan talks about increased enforcement and monitoring within the corridor. Companies operating facilities in the corridor are issued air and water quality permits through the Minnesota Pollution Control Agency (MPCA). Under these operating permits, facilities must adhere to various limits. Emission and discharges are monitored by the counties and MPCA. Facilities operating within the corridor should not be discriminated against by being forced to follow a separate set of permitting, monitoring, or enforcement rules than those located outside the corridor. Moreover, much of the air and water quality in and around the river are influenced by factors outside of the corridor. 5

Thank your for you consideration. The MPC will continue to monitor the MNNRA Management Plan as it proceeds and we are supportive of a plan that is workable for all stakeholders.

Sincerely,

Erin T. Roth

Erin T. Roth
Associate Director

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3. The plan states that local governments have the lead on land use planning and economic development activities for their portion of the corridor.

4. This statement was revised and clarified.

5. The rules referenced in the comment would be the same inside and outside the corridor. The plan encourages an increased emphasis on fully implementing existing rules and programs within the corridor.

Bottineau
Citizens in Action
2427 Second Street NE ■ Minneapolis, Minnesota ■ 55418 ■ 788-5098
A Good Neighbor to the Mississippi River

July 7, 1993

Superintendent, Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418, Box 41
St. Paul, MN 55101

Dear Superintendent:

On behalf of Bottineau Citizens in Action, I wish to comment on the Draft Comprehensive Management Plan Environmental Impact Statement dated June, 1993, for the Mississippi River National River and Recreation Area.

There is a component that is almost invisible in the report, except in vague terms. That is, existing and potential residential development along the River. In fact, your logo shows industrial and park components of the River corridor, but no scene of houses.

1 The Riverfront in Northeast Minneapolis is one of the most heavily industrialized areas of the River in the Twin Cities. Yet there is little concern about heavy industry attempting to coexist with residential structures, some of which go back over 100 years - owned by the same family. Who is concerned about the quality of life for these residents. And why is it not appropriate to include residential development for the River corridor if industrial development is acceptable?

2 A study should be undertaken to study the lock system and the tonnage passing through it which includes recreational boats as part of the tonnage. An interpretive center at the Grain Belt site should be included

3 in your plan which would serve as a resource for a comprehensive history of the River, including the history of the people who have lived on it.

Much more residential development existed along the River at the beginning of this century. In fact, some industrial development was actually built up around existing residential structures. I urge you to include a

4 strong statement of support for enhancing the quality of life for current Riverfront dwellers by encouraging the reduction of industrial development along the River corridor, and by encouraging the designation of some land for residential use.

Sincerely,

Randy Kouri

Randy Kouri
Managing Director

RK:FG

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1. Residential uses are given more recognition in the final plan (see response to comment G-4-1).

2. It is unclear from the letter what purpose this study might serve. The proposed surface water use management plan may address this.

3. The designation of the St. Anthony Falls site for an interpretive center was made after extensive discussions with interpretive partners in the area. The Grain Belt brewery site would not be desirable for the cooperative Minneapolis interpretive center because it does not offer the same concentration of significant cultural resources as found in the St. Anthony Falls Historic District. It is also too far downriver to be considered for the northern interpretive center. If an interpretive facility is developed at the Grain Belt complex by other parties, the National Park Service could consider it for associated facility designation and possible technical or grant assistance on interpretive programs and media.

4. The plan supports riverfront improvement, better interfaces between neighborhoods and industrial areas, and increased residential use in appropriate areas.

Bottineau
Citizens in Action
2427 Second Street NE ■ Minneapolis, Minnesota ■ 55418 ■ 788-5098
A Good Neighbor to the Mississippi River

October 11, 1993

Superintendent
Mississippi National River and Recreation Area
175 Fifth Street East, Suite 418, Box 41
St. Paul, MN 55101-2901

Dear Superintendent:

On behalf of Bottineau Citizens In Action, a neighborhood organization in Northeast Minneapolis, I want to comment on the Draft Comprehensive Management Plan, Environmental Impact Statement of the National Park Service.

BCIA does not endorse Alternative A (no action). We can support some aspects of the Proposed Plan and Alternatives B and C. Alternative B incorporates more of our concerns than other options. In general, we support efforts that:

5	• eliminate River pollution from all sources
6	• fully reclaim and restore the shoreline
7	• protect and reintroduce wild life and vegetation along the shoreline
8	• maintain a commitment to remove any industrial or commercial entity from the River that is not dependent on the River for commerce
9	• mandate that remaining industrial and commercial structures conform to design and environmental directives that respect the River and neighborhood residents
10	• promote efforts to ensure that River water is as clean when it leaves the national park area as when it entered it
11	• *provide better River access for neighborhood residents who live near the River, including* greenways that extend from neighborhoods to the River and extending the Great River Road as a parkway along Marshall Street in Northeast Minneapolis
12	• preserve neighborhood livability for those neighborhoods that adjoin and have residences on the River by denying inappropriate River development such as bars and heavy industry
13	• establish a sensible trail system that protects River neighborhoods from careless and destructive visitors
14	• establish an urban interpretive center utilizing existing structures on the River
15	• promote a River-focused environmental laboratory for school children and for adults who want to know more about the River and the people who live on it, centered at the Grain Belt brewery site
16	• mandate vigorous enforcement of existing pollution prevention, set back and land use laws; to date, the Minnesota Pollution Control Agency and the City of Minneapolis have had a dismal record on River protection
17	• promote additional laws to protect the water, ground and air from further degradation
18	• strongly support coordination and cooperation between government agencies and neighborhood residents.

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5. The plan advocates reduction of pollution from all sources.

6. Shoreline restoration or enhancement is encouraged.

7. The plan supports this activity.

8. The plan encourages commercial and industrial uses that no longer need a river location and that do not meet other criteria specified in the plan to relocate outside the riverfront area, especially if they are causing pollution.

9. Existing industrial and commercial areas would be largely unaffected by this plan. Actions are encouraged (but are not mandated) to improve the physical relationship of industries and other businesses to nearby neighborhoods. Local governments would the key to accomplishing this objective.

10. This idea was added to one of the visions in the plan.

11. The plan supports this concept.

12. Local governments would control specific uses.

13. The plan supports additional trail development that is sensitive to neighborhoods.

14. The plan includes urban interpretive centers using existing structures, such as the Washburn/Crosby mill complex in Minneapolis.

15. This idea may be considered during preparation of the follow-up interpretive plan for the corridor (regarding the Grain Belt site, see response to comment O-1-3).

16. The plan encourages rigorous enforcement of existing laws.

Those of us who have lived near and on the River are looking to the National Park Service as a catalyst for change on the River. The "critical area" of the River, as defined by the State of Minnesota in 1976, is still in a critical state of neglect, nearly 20 years later, by those intrusted with its health.

As you state in your Draft Plan, the Mississippi River Critical Area program lacked money, commitment and coordination. Other plans by municipalities, counties and state agencies also sit on the shelf for lack of interest and funding. It may be because they lacked another crucial element: neighborhood involvement. ***The National Park Service now has the Mississippi Corridor Neighborhood Coalition (MCNC) as a significant resource to ensure neighborhood involvement in River planning.*** MCNC is a newly formed consortium of several neighborhood organizations in Northeast and North Minneapolis. This coalition has been formed specifically to address River issues from a neighborhood perspective, and to do it in a coordinated, planned manner.

19 MCNC would not have tolerated a corridor plan that ignores the most industrialized and degraded portion of the River, namely, the urban section between Hennepin Avenue on the south and the Minneapolis city limits on the north. Virtually nothing is said about the Northeast and North Minneapolis residential neighborhoods whose residents made the industrial giants along the River successful, but who are ignored when the term "historical" is applied to the River corridor. These neighborhoods have been the dumping ground for heavy industry, much of it located on the River. What is the Park Service going to do to ensure an enhanced River experience for them? Equally important, how will the Park Service deal with the major River polluters as it develops a national park?

The National Park Service aerial video of the corridor jumps from downtown Minneapolis to the Coon Rapids dam, disregarding both the major polluters such as Northern States Power and American Iron, and a great architectural asset, the Grain Belt brewery site. Had anyone from the National Park Service visited residences along Marshall Street, they would have known, for example, that the noise pollution from the American Iron Company and J. L. Shiely Company is more than just "the typical urban sounds in more developed areas" (page 123, *Draft Comprehensive Plan)*. The noise from American Iron's west shore facility alone makes quiet conversation on the *east* River shore a challenge. And the visual pollution all the way from Hennepin Avenue to the City limits for Northeast Minneapolis communities is a disgrace. North Minneapolis residents are essentially denied River access because of industrial development along the west shore and the intrusion of I-94. Pollution of the air, ground and water from these industries, and others, has poisoned the River and degraded the neighborhoods.

Bottineau Citizens In Action has been a leader on environmental issues. It is currently the lead neighborhood in organizing the MCNC. We expect the MCNC to be an active partner with the National Park Service as you move forward on your Comprehensive Management Plan for the National River and Recreation Area. Neighborhood involvement and a commitment to reclaiming and preserving the River for residents is paramount to the success of the Plan.

Sincerely,

Frances Guminga

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17. Additional laws are not advocated by the proposed plan. It is felt that thorough enforcement of existing laws would achieve the environmental quality visions in the plan.

18. The plan supports such cooperation and coordination.

19. The MNRRA plan is a corridorwide plan that does not address specific segments of the river. City plans would cover these kind of issues. The MNRRA plan provides general guidance if the city chooses to participate in the MNRRA grant program.

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Comment to MRCC

Commission Members:

I represent the MRR, we are a small non-profit founded in 1982 and dedicated to the protection, preservation and improvement of the Mississippi River. We have done Cleanups, festivals and flotillas in order to raise awareness around issues that affect the MR. Our solid waste cleanups have occurred from Bemidji to Bellvue Ia. We have cleaned several thousands of tons of tires, litter, metal,plastic, foam and wood. We have had the support of government at all levels, businesses, civic groups and thousands of individuals. We believe that cooperative efforts are possible if everyone is willing to sacrifice a small amount to achieve a greater goal.

We have followed the MRCC process for the last three years and would like to thank the commission members past and present for their time and dedication to these issues. We know from experience that change on the River is a slow and gradual process. Decisions that we make now will affect the character of the River for future generations.

We would like to remind the Commission members of the impact of individuals such as Theodore Wirth who had the vision for the City of Minneapolis of creating a park corridor around the turn of the Century. The results of his efforts form the core of MNRAA area in the Gorge area of Minneapolis and helped develop the attributes of the Area which has led to this special designation.

We would like to thank the Park Service who have done a wonderful job of presenting the work and process of the Commission. They have had a difficult job of meeting the needs of the Commission, Business and the public and at the same time working within the framework of the dictates of public law and the MNRRA legislation.

It is the MNRRA process that we would like to comment on. We believe that the plan as it stands now and the options reflected in alternative B represents a good overall working document with some practical problems and issues that must be addressed if the plan is to be successful in meeting the intent of the law which has sponsored the plan.

To summarize the items-

1 A. Their must be provisions for a strong single entity with adequate enforcement within the plan to ultimately manage the MNRRA Area. The Metropolitan council has an obvious initial planning role but once this is accomplished the Councils role should be subordinate to other qualified entities of government.

2 B. There must be a balance of representation in the administration of the plan between the government entities, Large business and small business concerns, and the public who will be served. The plan only mentions public involvement through the Park Service and of course the formal role of the MRCC. This is a good start, however, more input in the form of an informal advisory board that is representative of the local community could help to insure that more of the general public are brought closer to the goals and process of the plan..

3 C. The MNRAA area must be administered according to a slightly higher standard for air, water and development if it intends to be recognized as an area worthy of special designation and worthy of State and Federal support. MNRRA plans to keep all regulations at current levels. The plan does allow for vigilance and some greater degree of enforcement. The MNRRA legislation defines special priorities for cleanups of Superfund sites and other long-standing problems that are festering on or near the River. The public will see the defined

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1. The commission and National Park Service would have a coordinating role. There was strong sentiment by many plan reviewers, including most corridor communities, against a new layer of approval in the corridor.

2. A statement was added to the final plan saying that public participation would continue on follow-up implementation plans.

3. The plan encourages increased emphasis on pollution control and more effective use of existing authorities but does not advocate higher specific air and water quality regulatory standards for the area within the corridor. Existing air and water standards, if achieved, would result in a significant improvement in the corridor. The plan encourages the use of incentives to voluntarily exceed these standards. While land development standards are similar to the state critical area standards, there are some improvements. Better implementation, consistency, and coordination would lead to improved development and higher environmental quality in the corridor and the plan's visions would be achieved.

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values emphasized in the plan if there is an attempt to instill a higher quality of air and water throughout the entire district. To do this the loading factor of the many licensed polluters must be taken into consideration.

D. Some specific points in the current plan are by their nature counterproductive to the plans effectiveness and purpose and should be modified. Most of these items relate to the critical area setback zone:

4 ;1. The perpetual grandfathering in of property that is nonconforming by land owners and their successors. This is not generally accepted practice when you plan to add a qualitative improvement to an area over time. All non-Conforming uses without a demonstrated need to be in a Critical area should be grandfathered out in time. Traditionally on the river the forty-sixty year business cycle has accomplished this, usually leaving a hazardous waste site for the Public to pick up the tab for cleanup.

5 ;2. Existing land behind levies should be considered equally with other flood plain land in the corridor. Land in a flood plain should be planned as natural areas as business use declines moves or is sold. The existence of a levee may be more of an historical feature than a practical necessity under the guidelines of the plan. The reopening of flood plain land upstream may preclude flooding of more valuable commercial residential land downstream. If the Corridor's significant values are enhanced more by a floodplain or a wetland they should be allowed in the future, even if current use precludes that.

6 ;3. Agricultural land in a flood plain should be maintained at that status and slated for acquisition or special research or scientific uses should it go out of production. Valuable agricultural land that leaves that status should be designated for a special use (should one exist) rather than be made available to any development, even limited development especially in the setback zone. By allowing further development in these zones one is counterproductive to the idea of encouraging the significant values for which the plan was created to enhance.

We support the Plans provisions for Wetlands and encourage that a process be established to clarify the rules for development concerning these areas in the Corridor. Under current law wetlands enjoy a limited protection. Recent experience has been that less than 5% of permits are denied for filling or eliminating wetlands. Increasing development and population in the MNRAA area should be sensitive to the wildlife needs of these areas. These areas are urban treasures of wildness which should be saved as much as possible for future generations to glimpse the past of this area.

We applaud the Plans intentions for Point Source pollution and non-point source pollution. We would like to suggest that the two can not be clearly defined in the corridor when tributary waters bring in pollutants. Both types must be addressed as a practical matter within the corridor. Non-point pollution or polluted runoff is a major problem in the corridor. When a stream runs pollutants into the river from yards, driveways, streets and business-industrial emitters, that stream becomes a point source of pollution. It is an unregulated and unpermitted source. Point source pollution is a qualitative problem. Large polluters are permitted for pollution amounts deemed allowable. As the area grows and loading of pollutants occur these permits should be modified on a local area standard that is designed to encourage voluntary reduction of emission over time.

7 We strongly support consideration of Native issues. The plan should consider that they

4. The commission decided, based on public input, to grandfather in existing uses and to delete a requirement to phase them out over time. This approach has been confirmed by the commission several times. There has been considerable opposition to the idea that these uses would be bought out over time on a willing-seller basis. The plan does encourage efforts to convert inconsistent riverfront land uses to consistent ones and to remove vacant, inconsistent structures in the corridor. Individual communities could and are encouraged to go beyond the basic concept in the plan if they determine that it is desirable for their portion of the corridor.

5. See response to comment G-8-2.

6. There is relatively little farmland remaining in the corridor. It would be considered along with other undeveloped land for open space.

7. The interpretive themes were expanded to further stress Native American cultures and their relationships to the river. The final plan includes a stronger commitment to interpreting this aspect of history. The proposed DNR visitor center at Fort Snelling State Park would be designated as a cooperative center, with special emphasis on this theme. Language throughout the plan was reviewed and revised to clarify the strong commitment to interpreting the ways that many diverse cultures have interacted with the river.

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be given a higher priority and the land interests according to a historical compilation that

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emphasized in interpretation. Because Indigenous people keep an oral tradition of history, they should be consulted during this process.

We would like to again emphasize that the plan be given a strong central authority. That authority should develop a strong relationship to the community served through a citizen arm that is representative of the community.

8 The US Park Service is given condemnation powers by the MNRRA law. A defined process should be outlined in the plan so it is clear to nonconforming entities that a threat of enforcement exits for extreme measures. Without this provision the plan is not enforceable and must rely on voluntary compliance. Past experience suggests that this method will not work or will work in a way that maximizes the cost of implementing MNRRA and undermines the intent of the Legislation. A defined process would delineate a clear playing field to minimize the insecurities of business, government and individual owners.

The administration of the plan should have a goal of creating a management plan for the area which includes and makes available input to the process of management by the Citizens who are the majority stakeholders in the MNRAA area. The act is essentially silent on the citizen question, however, recent elections have shown that citizens are increasingly concerned about there lack of voice in the affairs of government. Increasing pressures of work and family in our society make it difficult for the average citizen to compete with business and government entities in defending their interests in a process such as the MNRRA. They need adequate representation. An informed citizenry is more likely to understand the purpose and benefits of the MNRRA district. Community effort will be necessary to implement the plan successfully. All the efforts of planning, funding, and implementing the plan will be fruitless if the public does not validate the process.

Thank you again for your dedication to this issue and the great deal of time and attention devoted to these issues.

Sincerely

Roger Aiken-Director-Treasurer-Mississippi River Revival

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8. This authority is clearly spelled out in the open space discussion in the plan; however, the emphasis for plan conformance is on incentives rather than condemnation.

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Comment to MRCC BY ROGER K AIKEN

Commission Members:

I represent the MRR, we are a small non-profit founded in 1982 and dedicated to the protection, preservation and improvement of the MR. We have done Cleanups, festivals and flotillas in order to raise awareness around issues that affect the MR. Our solid waste cleanups have occurred from Bemidji to Bellvue Ia. We have cleaned several thousands of tons of tires, litter, metal, plastic, foam and wood from the River and its tributaries. We have had the support of Government at all levels, businesses, Civic groups and thousands of individuals. Despite these numbers our efforts are largely symbolic of the bigger problems on the river. We believe that cooperative efforts are possible if everyone is willing to sacrifice a small amount to achieve a greater goal.

We have followed the MRCC process for some time and would like to thank the commission members past and present for their time and dedication to these issues. We know from experience that change on the River is a slow and gradual process. Decisions that we make now will affect the character of the River for future generations. Every person on this commission past and present should be commended for their patience and dedication. This has been a long and difficult process requiring much time and personal sacrifice.

We would like to thank the Park Service who we think have done a good job of presenting the work and process of the Commission. They have had a difficult job of meeting the needs of the Commission, Business and the public and at the same time working within the framework of the dictates of public law and the MNRRA legislation.

We would like to request the Commission members and the public here today to consider the historical context of these meetings. The Law that established the MNRRA act is based on preserving many of the existing values of the area. These existing cultural, social and environmental values have come about over the last one hundred fifty years of development in our area. The MNRRA process offers a new method for handling change in the future of the River but the seeds were planted perhaps when Charles Loring appointed the first city forester in 1880 and as a result of greater interest in parks the Minneapolis Park board was established 110 years ago this year.

The impact of individuals such as Theodore Wirth who worked to create a unified park corridor around the City precedes our effort by 100 years. The results of these efforts form the core of MNRAA area in Minneapolis, and helped develop the attributes of the MNRRA corridor which has led to the legislation.

There has been controversy in the process of these discussions about the MNRRA process. The large businesses that surround the current River corridor are concerned that future development will be limited. It is ironic that at the time of the debate over the establishment of the first park system in Minneapolis in the 1880's prominent citizens argued for the plan. One such person, a Colonel William King called the Park system," a scheme which will bring more capital, more population and add more to the city's renown than any other scheme that could be devised."

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Obviously the motives for more parks were not all altruistic. But maybe this is a lesson for us today.

It is the MNRRA process that we are here to comment on. We believe that the plan as it stands now and the options reflected in alternative B represents a good overall working document with some practical problems and issues that must be addressed if the plan is to b e successful in meeting the intent of the law which has sponsored the plan and if the plan is to be successful in meeting the future economic needs of the community. We see the plan as presented in this alternative an asset to the overall economy of the area and not a threat to current business.

The concerns we have are mainly about process;

A. The process for administration needs to be clarified. Their must be provisions for a strong single entity with adequate enforcement within the plan to ultimately manage the MNRRA Area.

B. Their must be a balance of representation in the administration of the plan between the Government entities, Large business and small business concerns, and the public who will be served. Please remember that the basis of the MNRRA area is the River which is water. The law as it has come down to us is clear about who owns the waters of our state. There use, access and even purity are seen as basic rights by our citizens.

C. The MNRAA area must be administered according to a slightly higher standard for air, water and development if it intends to be recognized as an area worthy of special designation and worthy of State and Federal support. This does not mean duplication of effort of existing agencies. It does mean coordinated oversight or awareness of the problems and better communication between the public and private entities responsible for solutions.

During the course of discussions about this plan the economics have been discussed extensively. A special study was done by independent parties. The conclusions of these studies are important to frame the economic discussions that are occurring today.
I have heard many representatives of business frame this debate in terms of growth or no growth, restrictions on basic business freedoms and threats to basic property freedoms. The specter of fewer jobs has also been raised.

Our group also takes these issues very seriously, these people are our employers and supporters of many of our efforts. Given careful consideration and thoughtful nurturing we feel that the plan has many safeguards to prevent abuse. We see the plan as presented with alternative B as not a smaller piece of the pie but an added piece for business.

But we think that any view of the river planning that does not consider the past will be deficient in the future. Everything on the river happens slowly. Even the business cycle. In evaluating this plan the Commission should ask itself- as the early City builders of the nineteenth century did-What business exists on the River today that was here 40 or 60 years ago. Which of the businesses will be here 40 years from now.

In this context we should ask who are the beneficiaries of this planning. I hope that the commission will give the same consideration to small business, individuals, and the future constituents of our area who are not represented here today.

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Mississippi River Revival

Mississippi National River and Recreation Area

175 E 5th St. Suite 418 Box41

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Comment to the Commissioners:

This comment period has been a learning process for us all and as such this letter represents a clarification of some of our earlier comments. Our group is dedicated to action that we feel will be beneficial to the MR as a whole. In the formation of these comments we have, perhaps naively, ignored the politics of some of the issues stated below. *Our goal is not to unfairly penalize any group with an interest on the River,* but rather, to present a clear picture of how we view this plan as beneficial to the long term health of the River and its whole fabric of life.

We continue to express our support for the plan with some changes that would make the plan more specific and therefore clear to those who would be guided in the future by the plans mandates. The several points we wish to address are summarized below;

Strong support for the Park service as the lead member of the corridor management team.

Strong support for a continuing citizen involvement process in the MNRRA administration.

Improved Trails and corridor planning.

The management of water resources in such a way that no single group dominates that usage.

Protect undeveloped lands from private over development.

Strengthen the opportunities for small businesses to develop with the concept of the MNRRA area.

Specifically encourage a metrowide watershed protection program engaging the cooperation of local communities.

9 The U S Park Service should have a strong central role in the plan. We would suggest that more than a review authority the Park service should be granted a Veto power over permits issued by other agencies. The procedure may involve a publ.c

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9. Based on the legislative intent and considerable public input, the commission and the National Park Service have selected a plan that advocates local control, use of existing authorities, and incentives to encourage communities to implement the MNRRA plan.

level of protection to the public has been eliminated. Duplication of government is one *thing, but eliminating the legally mandated protections to our environment is another.* The plan is strong on 'streamlining' but does not present a any specific ways to insure that the public's interest is protected. An insertion on page 78 under the PP titled "The Corp of Engineers" could balance this omission in the plan.

10 Strong citizen participation should be encouraged in the plan. In order to insure that citizen and businesses work together to help implement the MNRAA process; The MRCC should establish a task force on citizen participation and work with the Park Service, the DNR , and the Army Corp to develop an active group of citizens and businesses in support of the plan. The PP titled *"Private Sector"* on page 79 should be rewritten to address a specific process for citizen involvement and specify a program direction for the National Park Service to pursue in accomplishing this goal with the other management partners of this plan. The plan should at least hint at the 'How" all of these items *will be accomplished.*

11

12 We recommend the formation of a citizens task force under the auspices of the NPS to develop and coordinate volunteer programs, cleanup projects, and comment on *interpretive matters. The method of appointment*, structure of the committee and duration of existence should be specified. Committee members should include citizens already active,knowledgable and involved in River issues in the community.

13 We support stronger language in the plan for mixed use of the waterways. The River has been a working River for almost 100 years. As such their is a natural bias away from other uses. It should be recognized that economic cycles on the River phase out old uses and new uses develop. The plan should strive to level the playing field for these mixed uses by making a statement for appropriate use of water resources. More recreational users should be given access to areas of the River dominated by industry. Other parts of the corridor should be given relief from careless noisy boat use and no wake zones declared. PP "(5)" on page 51 should reflect this balance by eliminating the language "while not significantly affecting the existing commercial navigation industry."

Improved trail and corridor management: The MPLS-STP area is second only to Washington DC in open space and parklands. To fully utilize this resource the regions trail systems should naturally converge around the primary defining natural feature of *our area-The Mississippi River. The plan for trails should be prioritized.* This program

14 deserves priority funding over some interpretive facilities. An educational effort on trails and the benefits to the community should be presented to local communities who will be able to update their older areas to modern standards.

15 We fully support the provisions listed on page 33 & 34. We think that this should also be a funding priority over certain interpretive facilities in the early stages of the *implementation process.*

Support for small business and new businesses. Our reading of the plan indicates many passages which tend to reinforce protections for existing large business

10. Statements were added supporting continued public involvement.

11. Organizations were added to the statement involving the private sector. The plan was amended to clarify how it would be implemented with the managing partners.

12. Consideration would be given to formulating *ad hoc* task forces to address specific projects for the corridor. A permanent citizen committee could duplicate the purpose of the commission.

13. A statement was added to address this concern.

14. A statement was added to emphasize that the grant program is a high priority for plan implementation.

15. There are different funding sources for development and grant programs, so these priorities would not be in direct competition. Appropriations for these activities are controlled by Congress.

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16 interests on the River. It should be recognized that many of these businesses developed in an age where a complex system of government direct and indirect subsidies have led to their economic domination on the River. It should also be recognized that for structural and societal reasons this situation is in flux and will likely lead to future changes in ways we cannot now foresee.

Small business cannot generally grow in an environment dominated by limited access to resources, controlled markets and excessive government subsidies to large industries. The plan should recognize these facts and contain a provision that should 17 specifically support business development for companies with revenues of less than $250,000 per year. We feel that many of the options expressed in Plan B will encourage the development of the area in such a way that tourism and recreation may become large scale service industries in the immediate future. PP 48 "Economic Resource Research Needs would be a good place to assert support for new future business uses.

The River has been viewed as an undesirable place until very recently. The businesses 18 and wastes that society considered undesirable came to be located on the River. There are many superfund sites along the MNRRA area as a result. Large existing businesses should demonstrate a commitment to improvement of the area as a condition of the support the plan offers them in the form of guarantees of noninterference with their business activities. Their existence on the River for the past forty or more years does not constitute some eminent domain over the Rivers use by others.

Specifically recognize the watershed area of the MNRRA Corridor:

19 The plan should clearly define the watershed that encompasses the Seven County Metro area. The corridor is legally defined, however interpretive activities talk about a watershed approach. The watershed should be defined in the plan. This might be stated in the Interpretation, Education and Visitor Services section on PP52. Also a map should be included. The corridor's watershed area might be referred to by creek or tributary River basins with county lines serving as limits. An interpretive process should encourage the spread of information about the influence of the watershed on the MNRRA area and progress towards improvement monitored. This would include additional water testing which could be done by existing citizen programs.

Thank you for your consideration and your service.

Sincerely, R Ce ka

Roger Aiken-Treasurer-for the Mississippi River Revival

16. The MNRRA legislation recognizes continuation of existing business interests along the river. The MNRRA plan encourages new business that is sustainable and meets other visions, concepts, and policies in the plan.

17. Emphasizing small business is not an appropriate policy for the MNRRA plan. Any sustainable economic activity that accomplishes the visions, concepts, and policies in the plan is encouraged, especially if it replaces an inconsistent activity.

18. The plan supports corridor cleanup.

19. The MNRRA plan supports planning and cleanup for the entire Mississippi River watershed.

CITIZENS FOR A BETTER ENVIRONMENT
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COMMENTS ON THE

MISSISSIPPI NATIONAL RIVER AND RECREATION AREA

COMPREHENSIVE DRAFT MANAGEMENT PLAN
AND
DRAFT ENVIRONMENTAL IMPACT STATEMENT

SUBMITTED TO THE NATIONAL PARK SERVICE

OCTOBER 6, 1993

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EXECUTIVE SUMMARY

Citizens for a Better Environment (CBE) is a midwest environmental advocacy group with offices in Illinois, Wisconsin, and Minnesota. We have more than 125,000 supporters regionally, with more than 32,000 here in Minnesota.

While the Mississippi has been a source of pride and respect it has also been used as a cheap dumping ground for domestic and industrial wastes. The Mississippi National River and Recreation Area (MNRRA) will play a key role in its revival.

CBE supports the work done thus far by the Mississippi River Coordinating Commission (MRCC) and the National Park Service (NPS) to develop the draft Comprehensive Management Plan (CMP) and Environmental Impact Statement (EIS). However, as with any first draft, more work is needed on this plan. We are especially concerned about the plan's incomplete treatment of environmental pollution problems facing this recreation area.

We strongly urge the MRCC and NPS to make the effort needed at this time to rework this key part of the plan. While the MRCC has been active for three years and many industry representatives have worked on earlier drafts, it is important to remember that the short comment period now ending was the public's first crack at a real document.

ROLES OF STATE AND LOCAL ENVIRONMENTAL AGENCIES NEED DEFINITION

Several key components are needed to build a strong environmental plan. First, the plan must clearly define the relationship between the NPS and local agencies such as the Minnesota Pollution Control Agency (MPCA) and the Department of Natural Resources (DNR). Additional resources should be provided by MNRRA to these agencies to move the plan forward. More specific details of a strong plan are outlined below.

INVENTORY ENVIRONMENTAL POLLUTION IN MNRRA

The 72 miles of Mississippi River included in MNRRA are some of the most polluted in Minnesota. Perhaps no more significant accomplishment could come out this planning process than focusing federal, state, and local resources on stemming this tide. However, the EIS supplies almost no data on the millions of pounds of permitted and unpermitted pollution dumped here each year.

See detailed comments and responses beginning on page 8 of the Citizens for a Better Environment submission.

For example, manufacturers in MNRRA reported releasing 10.6 million pounds of toxics to the air, land, and water in 1991 under the federal Community Right to Know Act. Data from 1988 river sediment, and 1990 water monitoring done by the Metropolitan Waste Control Commission (MWCC) shows elevated heavy metal contamination at river miles 831, 826.7 and 815.6. These test sites are located near pipes coming from the Metropolitan Wastewater Treatment Plant, Ashland, Koch Refinery and 3M's Chemolite facility, respectively. Trace organic such as Bis (2-ethyl hexyl) phthalate, rise sharply at river mile 815.6.

A 1988 study done by CBE found that ten companies in MNRRA are permitted to dump 10 million pounds of toxic chemicals and over 180,000 pounds of 17 different known or suspected carcinogens into the river each year in the Twin Cities area. A 1993 CBE survey of river dischargers showed that approximately 71 percent of the entire point source discharges to the river in Minnesota are within the MNRRA corridor.

Parts of MNRRA are included in the Ramsey County PM 10 non-attainment area which has been targeted by the U.S. Environmental Protection Agency because of high air pollution levels. Other data are also available from an environmental monitoring study now going on at 3M's Chemolite facility as part of a settlement reached with the MPCA for air permit violations.

As is evident from this data, a revised EIS should include an inventory of all the pollution created in MNRRA so that a serious effort can be made to design a program which makes improvements.

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POLLUTION PREVENTION PROGRAM SHOULD BE CORNERSTONE OF THE MNRRA

While the draft plan does include language to "encourage pollution prevention," a specific pollution prevention program is needed. Especially important is the need to work with industries to cut the use of toxic chemicals. CBE recommends that the NPS hire permanent full-time staff to coordinate pollution prevention efforts with federal, state, and local authorities on such programs as the Minnesota Toxic Pollution Prevention Act.

MINNESOTA SHOULD CLASSIFY MNRRA AS AN OUTSTANDING RESOURCE VALUE WATERWAY

The state of Minnesota can greatly help efforts to improve water quality in MNRRA by reclassifying the area as an Outstanding Resource Value Waterway under the water quality classification system. This action should be included as a goal of the final plan.

MINNESOTA SHOULD AUTHORIZE MNRRA AS A CLASS I AREA UNDER THE FEDERAL CLEAN AIR ACT

Minnesota can also improve MNRRA by working with the NPS to authorize the area as Class I under the federal Clean Air Act. This would help insure that no further deterioration of the MNRRA airshed would occur from new air pollution sources.

POINT SOURCES OF POLLUTION SHOULD BE TARGETED EQUALLY WITH NON-POINT SOURCES

The draft plan emphasizes non-point over point source pollution. While CBE recognizes the need for a strong non-point program, it is well known that fish tissue, water and sediment quality decline noticeably below major point source dischargers. In light of this information, we strongly feel that point source and non-point source pollution should be given equal attention.

ASSESS THE FEASIBILITY OF A NON-MOTORIZED RECREATIONAL BOAT ZONE IN THE RIVER GORGE BETWEEN THE FORD DAM AND ST.ANTHONY LOCKS

One of the greatest jewels of this nation's federal lands is Minnesota's Boundary Waters Canoe Area. Thousands of Twin Citians drive for hours to enjoy a few days of travel without the pollution and roar of outboard motors. CBE recommends that the feasibility of zoning the river for non-motorized recreation boats in the gorge area between the Ford Dam and St. Anthony Falls be studied. This complements current restrictions on motorized boat use in Minneapolis parks.

NO FURTHER DESTRUCTION OF WETLANDS SHOULD BE ALLOWED

Wetlands are vital to water quality and the health of river ecosystems. Not only should existing wetlands in MNRRA be protected, other wetlands should be enhanced and restored. The proposed plan should state that no loss of wetlands will occur. The NPS should review all land use plans to assure no loss of wetlands in the corridor.

I. INTRODUCTION

Citizens for a Better Environment (CBE) appreciates the opportunity to comment on the draft Comprehensive Management Plan (CMP) and Environmental Impact Statement (EIS) for the Mississippi National River and Recreation Area (MNRRA). We are a midwest environmental advocacy group with offices in Illinois, Wisconsin, and Minnesota. CBE has more than 125,000 supporters regionally, with more than 32,000 here in Minnesota.

The establishment of MNRRA represents a turning point in the history of the upper Mississippi River. The National Recreation Area status acknowledges its important place for the natural and human communities of the area. The river is the prominent natural feature of this bioregion.

While the Mississippi has been a source of pride and respect, it has also been used as a cheap dumping ground for domestic and industrial wastes. In the past, the water and shorelines were so degraded that communities turned their backs to the river and the responsibility of their own actions. More recently, there has been a revival in concern for both its character and environmental quality. MNRRA will play a key role in that revival.

Many characteristics separate MNRRA from more traditional NPS units. Located within a major urban area, this recreational area presents unique challenges and opportunities for both the NPS and local communities. CBE supports the work done thus far by the Mississippi River Coordinating Commission (MRCC) and the NPS to develop a plan which can protect and enhance the environmental quality of the Mississippi River and integrate this important natural system into the lives of urban dwellers.

However, as with any first draft, more work is needed on this plan. While CBE's comments cover a wide range of issues, as outlined below, we are especially concerned about the plan's incomplete treatment of environmental pollution problems facing this recreation area. Help is desperately needed to improve the incomplete enforcement of environmental regulations in MNRRA and develop more proactive prevention policies in the future.

Most striking, is the plan's lack of a quantitative assessment of MNRRA's pollution and specific language on how the NPS will work to implement a long list of environmental goals and actions. Blatantly missing is any clear explanation of the role to be played by the Minnesota Pollution Control Agency (MPCA) in the process.

MNRRA's enabling legislation discusses the role of local agencies

and authorities to assist in implementing the plan. CBE feels that cooperative agreements with the MPCA and other agencies discussed in the plan, such as the Metropolitan Council and the Minnesota Department of Natural Resources, should be the central component of a workable plan. Additional resources that MNRRA can bring to this portion of the Mississippi River can act as the incentive needed to get these agencies on board.

We strongly urge the MRCC and NPS to make the effort needed at this time to rework this key part of the plan. While the MRCC has been active for three years and many industry representatives have worked on earlier drafts, it is important to remember that the short comment period now ending was the public's first crack at a real document.

CBE's comments on the draft CMP and EIS include comments divided into the following categories:

- Environmental Pollution
  - Pollution Prevention
  - Water Pollution
  - Air Pollution
- Non-motorized Use of MNRRA
- Wetlands
- Threatened and Endangered Species
- Cultural Resources Management
  - Native American Cultural Sites
  - Other Cultural Issues
- Socioeconomic Resources
- Visitor Use Management
- Corridor Trail System
- Land Use and Protection Policies
- Commercial Navigation
- General Comments

A short narrative in each section is followed by specific language changes needed in the CMP and EIS.

ALL TEXT INSERTIONS ARE UNDERLINED.

~~ALL TEXT DELETIONS ARE STRUCK.~~

II. ENVIRONMENTAL POLLUTION

The 72 miles of Mississippi River included in MNRRA are some of the most polluted in Minnesota. A multitude of point, non-point, and mobile sources contribute millions of pounds of pollution each year to MNRRA's environment. Perhaps no more significant accomplishment could come out this planning process than focusing

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federal, state, and local resources on stemming this tide.

And yet, the draft CMP and EIS provide little quantitative analysis of the current problem or what type of relationship key agencies such as the MPCA would have in implementing the somewhat ambitious Policies and Actions proposed on page 40.

1 Data are available from a wide variety of sources on the millions of pounds of permitted and unpermitted pollution dumped in MNRRA each year. It should be included in the EIS discussions as a new section in the Natural Resources discussion which begins on page 111.

For example, manufacturers in MNRRA reported releasing 10.6 million pounds of toxics to the air, land, and water in 1991 under the federal Community Right to Know Act. (See appendix A.) Data from 1988 river sediment, and 1990 water monitoring done by the Metropolitan Waste Control Commission shows elevated heavy metal contamination at river miles 831, 826.7 and 815.6. These test sites are located near pipes coming from the Metropolitan Wastewater Treatment Plant, Ashland, Koch Refinery and 3M's Chemolite facility, respectively. Trace organic such as Bis (2-ethyl hexyl) phthalate, rise sharply at river mile 815.6. (MWCC)

A 1988 study done by CBE found that ten companies in MNRRA are permitted to dump 10 million pounds of toxic chemicals and over 180,000 pounds of 17 different know or suspected carcinogens into the river each year in the Twin Cities area. (CBE) A 1993 CBE survey of river dischargers showed that 71 percent of the entire point source discharges to the river in Minnesota are within the MNRRA corridor. (See appendix B.)

Parts of MNRRA are included in the Ramsey County PM 10 non-attainment area which has been targeted by the U.S. Environmental Protection Agency because of high air pollution levels. Other data are also available from an environmental monitoring study now going on at 3M's Chemolite facility as part of a settlement reached with the MPCA for air permit violations.

Pollution from mobile sources active in the recreation area should also be included.

2 As is evident from this data, a revised EIS should include an inventory of all the pollution created in MNRRA so that a serious effort can be made to design a program which makes improvements.

3 CBE also recommends that the NPS create an Environmental Quality committee as part of the final plan. This group would be charged with setting specific goals and strategies for improvement. Also

4 needed is a clear definition the of relationship between the NPS

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1. This level of detail is beyond the scope of a comprehensive management plan. Additional data on pollution sources would be addressed in the resources management plan and follow-up inventories.

2. The NPS staff asked MPCA staff if there was readily available data for the corridor that could be added to the document. The information is not in an easily convertible form for the MNRRA geographic information system. This detailed information is not considered essential for the analysis of general pollution control visions and policies contained in the environmental impact statement. Detailed inventories would be assessed during preparation of the resources management plan and in follow-up inventory work.

3. The National Park Service is committed to ongoing opportunities for public involvement on resource protection matters. A committee, such as the one suggested by the comment, could be one mechanism to achieve this goal.

4. The comprehensive structure for these relationships is spelled out in the Partner Roles section of the plan, which was expanded. The Minnesota Pollution Control Agency was specifically added as one of the key partners. Additional details on relationships would be worked out in follow-up agreements.

and local agencies such as the MPCA and the Department of Natural Resources (DNR). Additional resources should be provided by MNRRA to these agencies to move the plan forward.

LANGUAGE CHANGES NEEDED

5 1. Page 113, line 1, add: Environmental Pollution. The 72 miles of Mississippi River included in MNRRA are polluted by a variety of point, non-point, and mobile sources which contribute millions of pounds of pollution each year to its environment. A compilation of data from federal and state sources is included below, in an effort to provide a baseline understanding of the recreation area's current environment. (INSERT DATA)

6 2. Page 39, Natural Resource Management, Pollution section, line 14, delete: ~~...water in the corridor would be asked to implement the policies below that are specific to water quality.~~ Insert: environmental pollution in the recreation area would be part of an Environmental Quality committee charged with setting specific goals and strategies for improvement and clearly defining the relationship between the NPS and local agencies when implementing such goals.

7 3. Page 39, Resources Management section, line 16, insert: "areas in the corridor. Grant-in-aids, cooperative agreements and other sources of funding will be used to assist partners in achieving the resource management goals of MNRRA.

A. POLLUTION PREVENTION

Because the focus of MNRRA is the Mississippi River in an urban setting, issues such as environmental quality and pollution prevention should be given primary consideration by the NPS and the Environmental Quality committee. Especially important is the need to work with industries to cut the use of toxic chemicals. While the draft plan does include language to "encourage pollution prevention," a specific pollution prevention program is needed.

CBE recommends that the NPS hire permanent full-time staff to coordinate pollution prevention efforts with federal, state, and local authorities on such programs as the Minnesota Toxic Pollution Prevention Act and Community Right to Know.

The unique duties of a pollution prevention specialist can not be handled by the traditional natural resource management position. Pollution prevention specialist positions should be added to the Division of Planning and Resource Management, Additions to Staff

5. A statement was incorporated in the Final Environmental Impact Statement acknowledging that a number of the point sources affecting the river are outside the corridor (see response to comment O-3-2).

6. The final plan was revised to stress that opportunities for public participation would be provided during follow-up planning.

7. This comment was incorporated.

list on page 219.

Language changes needed

8 1. Page 39, Resource Management section, line 25, insert: Because MNRRA is focused around the Mississippi River in an urban and industrial setting, improving environmental quality through pollution prevention will be the primary goal of the resource management plan. A pollution prevention program with permanent, full-time staff will be developed to coordinate efforts with state and local authorities on such programs as the Minnesota Toxic Pollution Prevention Act. Staff will be charged with understanding the rules, regulations and policies that govern environmental quality in MNRRA. They will determine the impacts of these directives on the park and how pollution can be further reduced and eliminated in the corridor. Staff will also work to establish a grant program to assist local governments and river industries to reduce and eliminate the pollutants.

9 2. Page 40, Proposed Actions & Policies section, line 2, insert: (1) Hire permanent, full-time pollution prevention staff to coordinate pollution prevention efforts on the Mississippi River and to establish grant-in-aid programs to assist government and industry with pollution prevention efforts.

B. WATER POLLUTION

Preserving and protecting the water quality of the Mississippi River is absolutely essential to the integrity and successful implementation of MNRRA. As evidenced by Department of Health fish advisories, state and national water quality regulations have not been successful in eliminating pollution (MDH 1993).

The proposed plan emphasizes non-point over point source pollution. We recommend the plan give equal attention to the many point-source pollution dischargers on the river. As outlined on page 8, there is plenty of data documenting point pollution in MNRRA.

Additionally, the plan must also recognize and address impacts to the water river from Superfund sites, hazardous waste sites, sediment loading, spill prevention and response and dredging methods and disposal. The plan avoids these issues or treats these key issues in such a general way that it is difficult to determine the proposed plan's position.

The latest Minnesota Fish Consumption Advisory (May 1993) data should be listed in the "Affected Environment" section of the

8. The MNRRA plan supports pollution prevention and control efforts for the entire area. The need for additional staff for a number of MNRRA plan implementation activities is recognized in the document; however, hiring details and staff assignments are beyond the scope of the comprehensive management plan and are a matter for annual park operations.

9. See response to comment O-3-8.

text (p.121). This data is available for both the Mississippi and Minnesota River portions of the MNRRA corridor.

The draft CMP is not clear on how it will improve water quality. As outlined on page 8, CBE recommends that goals and strategies for improved water quality would be part the plan compiled by an Environmental Quality committee. These goals should adhere to the strategies of the Metropolitan Council's plan, Water Quality Management for the Next Century (Metropolitan Council 1993). By the year 2015, this plan calls for the Mississippi River to be as clean when it leaves the Twin Cities area as when it entered. The following points would be basic tenets of a successful program to improve water quality and should be included in the Environmental Committee's charge:

--A non-degradation policy should be the guiding principle for water quality. Mississippi River water should not be degraded as it flows through the MNRRA corridor.

--Point source and non-point source pollution should be given equal emphasis and consideration.

--MNRRA should be reclassified to the Outstanding Resource Value Waterway (ORVW) status under the water quality classification system of the MPCA. Exceptional recreational value is one of the criteria for an ORVW designation. Because the MNRRA legislation recognizes the nationally significant recreational value of this river, an ORVW classification would enhance this section of the river.

-Goals should be consistent with the MPCA draft water quality standards which no longer use fish as the sole biological indicator for an aquatic system's condition. (MPCA 1993).

--River sediment management should be clearly defined. The issue of contaminated river sediments is not adequately addressed by either the draft CMP or the EIS. There needs to be a subsection in the Natural Resources Management plan and in the Water Resources section (p.120) of the Affected Environment section that discusses these sediments in greater detail than what exists now.

A table listing the agencies responsible for water quality on the river, the rules and regulation that they enforce, and any specific designations that apply to the river should be listed. (e.g., the MPCA's water quality classifications).

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Language Changes Needed

10 1. Page 39, Pollution subsection, line 28, insert: "...72-mile length. In addition, the river should be as clean when it leaves the corridor as when it enters. A non-degradation policy for the entire 72 mile corridor will be the guiding principal. This plan encourages..."

11 2. Page 39, Pollution subsection,line 35, delete: "...control policies ~~should focus on non-point sources because of the relatively greater impact it now has on the river.~~" Insert: should focus equally on both point and non-point sources. Active cleanup..."

12 3. Page 39, Water Quality section, a new map should be inserted at this part of the plan. The principal sources of point source pollution should be shown on a map entitled "Major Point Source Pollution and Sites in MNRRA." This map would present the locations of the major point sources of pollution, hazardous waste sites and Superfund sites. No maps or tables exist anywhere in the entire plan that illustrate the pollution problems of the river. This information is needed to educate and inform citizens and other interested parties about the state of the Mississippi River in MNRRA.

13 4. Page 40, new # 2 Adopt a non-degradation policy for the recreation area that the river should be as clean leaving the corridor as when it enters.

14 5. Page 40, # 13, line 2, add: MPCA currently lists the MNRRA corridor under three different water quality classes. To assist in the comprehensive management of the corridor, all MNRRA waters shall be classified as an Outstanding Resource Value Waterway.

15 6. Page 121, Insert: Table/list of fish in MNRRA for which there are consumption advisories. Data are available from MN Department of Health (see References).

16 7. Page 121, line 25, Insert: "barges. River sediments in the Twin Cities area at river mile 815.6 contain at least 12 different toxic organic and 14 different heavy metals. River sediment monitoring done by the Metropolitan Waste Control Commission shows elevated heavy metal contamination at river miles 831, 826.7 and 815.6. These test sites are located near pipes coming from the Metropolitan Wastewater Treatment Plant, Ashland, Koch Refinery, and 3M's Chemolite facility, respectively.

8. Page 162, line 1, change: "...regulatory agencies ~~might~~ will

10. This concept was added to one of the plan's visions.

11. The draft language was based on the assumption that much was being done to address point sources and a relatively greater effort was needed on nonpoint sources. A statement reflecting an equal emphasis would not be an appropriate policy in this case. The text was revised to clarify that it is an emphasis, and that point sources would be given due consideration.

12. This map would be difficult to accurately develop for the final environmental impact statement and is not considered essential to understand the policies contained in the MNRRA plan. A general, small-scale map showing monitoring stations and discharge points in the corridor is on file at MNRRA headquarters in St. Paul.

13. This concept was added to one of the plan's visions.

14. This type of designation would set tighter restrictions on point source emissions into the river and would have to be made by the state. It could have significant implications for the metropolitan area and could be considered in Metropolitan Council water quality planning efforts. Preliminary discussions with MPCA staff indicate that the Mississippi River within the MNRRA corridor does not meet the criteria for outstanding resource value designation, and this designation is extremely unlikely to succeed in a rulemaking process given the nature of the corridor and the need to retain discharge points.

15. A list was added to the appendix.

16. A general statement was added to the environmental impact statement that acknowledges the presence of organic and heavy metal contamination in the river corridor. Detailed information is not essential for the final environmental impact statement.

C. AIR POLLUTION

The air quality sections in both the CMP and the EIS need significant changes. Air pollution is a major health and environmental issue within MNRRA and improvements in air quality can and must be addressed by a revised plan.

The EIS's two paragraph discussion of air quality (page 123) includes no quantitative data at all. The **Proposed Policies & Actions** (pages 40-41) speak in very broad terms that leave much to interpretation. While the proposed plan's impact on air pollution from watercrafts and industrial sources are discussed in a minimal way (page 162), no mention of mobile sources is included here.

One way to begin improving the MNRRA airshed is for the state of Minnesota to work with the NPS to designate the area as Class I under the federal Clean Air Act. This would help insure that no further deterioration of the MNRRA airshed would occur from new air pollution sources.

Under a Class I designation, new air permits for major polluters within 100 kilometers of MNRRA would be reviewed by the NPS to see if they adversely affect the scenic, cultural, biological, and recreational values of the recreation area. Major sources include polluters with the capacity to emit 250 tons a year of any regulated pollutants. Minors sources would not be affected. (GAO)

There are 158 areas designated by the 1977 Clean Air Act amendments as Class I. NPS manages 48 of these as National Parks with a land area totaling 14.2 million acres. The NPS has very good track record in reviewing permits. From 1977 to 1987, NPS staff received 107 permits and reviewed 82 percent of them. Forty-three percent of the comments made were accepted. The NPS also spent $4.6 million on inventory and monitoring activities and $11.8 million on cause and effect studies during that period. (GAO)

Under the Clean Air Act, states are given the authority to designate federal lands as Class I. (Currie, EPA) An area which exceeds 10,000 acres and is a national recreation area qualifies for designation. (Currie) The Department of Interior and Forest Service have recommended federal lands in 14 states be designated as Class I. However, no state has done this to date. (GAO)

A revised plan should also incorporate resources from the NPS to coordinate air monitoring efforts within MNRRA.

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Air quality issues raised by watercraft also need to be further addressed. These craft have direct impacts on the aquatic environment and the visitor experience.

The NPS should be the lead agency to manage air quality on the river itself. Air quality standards should be set for watercraft using the MNRRA corridor. The NPS should work with the appropriate agencies to prohibit watercraft on the corridor that exceed air quality standards. Examples of these watercraft include, jet skis and other personal watercraft, large horsepower motorboats, etc. No wake zones, horsepower limits, and other indirect management techniques could be used to address these issues.

Language Changes Needed

17 1. Page 40, #20, add before "Review.." : The State of Minnesota should pursue authorization of MNRRA as a Class I area under the Clean Air Act. This will make it possible to "review federal regional air....

18 1. Page 162, Air Quality section, line 8 insert: "...noise. Certain types of watercraft, e.g., personal watercraft, could have localized, negative impacts to air quality and noise levels, if their use is unregulated throughout the corridor. Their presence could negatively impact other users of the river and shoreline areas. These increases would be generally insignificant but could be locally great, especially..."

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III. NON-MOTORIZED USE OF MNRRA

The river through MNRRA has been dominated by barges and motor boats. Non-motorized boating is a minimum impact activity that should be promoted in the recreation area. These boaters need to be provided with opportunities to have a safe recreational experience without being threatened by the presence of large motor boats. More non-motorized access sites should be built to promote this use. We agree with point 5, page 51.

19 However, the proposed plan does not go far enough in promoting non-motorized boating on the river. The NPS should work with the Army Corps of Engineers to study the feasibility of non-motorized boat only hours as a means to provide these users with a safer conveyance through the lock and dam system.

Water surface regulations remain under the control of local governments and this is not sufficient to address the predicted expansion of non-motorized recreational use resulting from MNRRA.

17. This type of designation would set higher air quality standards for the area. It has major implications that would go far beyond the MNRRA corridor, and it would have to be made by the state of Minnesota. For these reasons, it was not addressed in the MNRRA plan. Preliminary discussions with MPCA staff indicate that the MNRRA corridor does not meet the criteria for class I. Such a designation would have serious, negative impacts on industrial development in the Twin Cities Metropolitan Area.

18. This concern was added to the Environmental Consequences section.

19. Nonmotorized use periods would be evaluated in the surface water use management plan and the visitor use management program. The legal and institutional ability to accomplish this would be assessed in this review. The plan would be prepared with public participation.

20 The Park Service needs to be the lead agency to implement consistent water surface-use regulations throughout the corridor. With the boom in popularity of high speed recreation boats, speed limits, no-wake rules, horsepower limits, and other regulations are needed to help make the river safe for all users.

In addition, CBE recommends that the feasibility of zoning the river for non-motorized recreation boats in the gorge area between the Ford Dam and St. Anthony Falls be studied. This would also complement current restrictions on motorized boat use in Minneapolis parks.

Language Changes Needed

21 1. Page 49, line 35, insert: "...enhanced. Non-motorized recreation would be promoted on the river.

22 2. Page 49, line 38, insert: "...for low-impact recreation and non-motorized boating, impact monitoring..."

23 3. Page 51, line 40, insert: "...Department of Natural Resources. The National Park Service will review the water surface-use regulations corridor-wide to promote non-motorized recreation which has historically not been promoted on the river."

24 4. Page 51, line 32, insert:
(6) Establish non-motorized recreational use zones upstream from the Coon Rapids Dam and from St. Anthony Falls to Ft. Snelling St. Park.

25 (7) Require that the navigational locks have some hours reserved only for non-motorized boats. Some blocks of time on the weekends would be necessary.

IV. WETLANDS AND OTHER NATURAL HABITATS

Wetlands are vital to water quality and the health of river ecosystems. Not only should existing wetlands in MNRRA be protected, other wetlands should be enhanced and restored. Examples include: Crosby Lake, Upper Lake, Pickerel Lake, Pig's Eye Lake, and Lilydale Park. The proposed plan should state that no loss of wetlands will occur. The NPS should review all land use plans to assure no loss of wetlands in the corridor.

On lands contiguous to the corridor, at least a 1 to 10 replacement ratio should be required for any filled wetlands. Replacement should occur only within the same watershed and be

20. The text was modified to clarify that under current law the National Park Service does not have the authority to implement water surface-use regulations. The National Park Service would coordinate efforts and work with other agencies to develop a surface water use management plan and a comprehensive visitor use management program. Implementation would rely heavily on the cooperation of area partners, such as the Department of Natural Resources and corridor communities.

21. Additional emphasis on nonmotorized river use was added to the plan.

22. Additional emphasis on nonmotorized river use was added to the plan.

23. This would be considered during preparation of the surface water use management plan.

24. This is a site-specific issue that is beyond the scope of the comprehensive management plan. It would be considered during preparation of the surface water use management plan.

25. This is a site-specific issue that is beyond the scope of the MNRRA plan. It would be considered during preparation of the surface water use management plan.

the same type of wetland as the one being destroyed.

In addition, natural habitat improvements and restorations should be made corridor wide. The NPS should aggressively identify crucial habitats and cooperate with local communities and agencies to restore and protect these sites. Oversight of watershed management plans now coordinated by the Metropolitan Council offers another method for restoring watersheds.

CBE supports adoption of the text of Plan B for the entire Land and Water Use section. The land use protection policies in the Alternative B plan (pp.94-95) and the floodplains and wetlands section of the EIS (pp.172) are preferable and provide more protection to endangered habitats and wetlands than the Proposed Plan.

Language Changes Needed

26 1. Page 29, line 5, delete item 12: ~~Protect existing wetlands and, where practical, restore degrade wetlands. Establish a floodplain encroachment ceiling so that small increments in development do not gradually degrade the floodplains~~. insert: Protect existing wetlands and enhance and restore degraded wetlands. Establish a floodplain encroachment ceiling so that no more development occurs within the floodplain.

27 2. Page 122, Wetlands section, line 23, re: "231 types of wetlands..." The text should explain how this number of wetlands was derived and the word "type" is misleading as the standard text for wetlands classification, Classification of Wetlands and Deepwater Habitats of the United States (Cowardin 1979), refers to "dominance types" and lists only 20 "types". The text should also state which wetland classification system it is using.

V. THREATENED AND ENDANGERED SPECIES

28 The draft CMP is not pro-active enough the issues of threatened and endangered species. NPS must be the lead agency to promote wise land use planning in the corridor that does not result in the loss of habitat, especially for threatened and endangered species.

The CMP and the EIS present contradictory statements about the predicted increase of recreation in the corridor on page 160, line 25. The EIS is incorrect to state that the increased recreation in the corridor will not have any adverse impacts on threatened or endangered species. Exotic and undesirable species of plants and animals, such as milfoil and zebra mussels, are

26. See responses to comments G-35-16 and G-36-4.

27. This was clarified in the final environmental impact statement.

28. This would be an important goal of the land management program. A location policy and a site development policy were added to the plan supporting the protection of rare, threatened, and endangered species and their habitats. The Metropolitan Council and local governments would have the lead role in promoting wise land use planning and implementing this policy. A separate section was inserted under Resources Management in the final plan to emphasize threatened and endangered species protection.

widely known to be transported of hulls and other parts of boats and trailers. The EIS needs to be amended and discuss the possible increased transmission of these species.

Several other issues should be included in the CMP, including:

--Equal consideration must be given to Minnesota State listed threatened and endangered species that is given to federally listed species. Both the CMP and EIS should discuss the status of the State of Minnesota listed species in the text as occurs with the federally listed species on pages 116-119.

--Substitute Alternative Plan B's section on Threatened and Endangered Species (p. 97) for the Proposed Plan's section.

--The EIS should discuss the impacts of the spread of exotics and other undesirable species with the predicted increased use of the river.

--Require a boat and trailer cleaning policy similar to the DNR to disrupt the transportation of zebra mussels and other exotic species into MNRRA.

Language Changes Needed

1. Page 42, line 3, insert:
Proposed Policies & Actions:

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29 (1)Research will be conducted to determine the effects of increased boating on the threatened and endangered plant and animal species.

30 (2)Require all watercraft that have used waters where milfoil, zebra mussels, and other exotic species are known to live, to wash their vessels in accordance with guidelines established by the Minnesota Department of Natural Resources.

31 (3)Equal emphasis will be given to the State of Minnesota and federally listed threatened and endangered plant and animal species.

32 2. Page 160, last paragraph, line 41 insert: "...native wildlife inhabitation. There could be an increase in the spread of exotic plant and animal species in the corridor as a result of the proposal. The increased use of motor boats could spread unwanted species from one water body to another.

29. Research of this nature would be considered in the resource management plan and visitor use management program for the corridor.

30. A policy was added that supports efforts to control the spread of nuisance exotic species in the corridor. The Department of Natural Resources would have the lead in further developing this effort and the resource management plan would provide some additional detail.

31. The plan was revised to include state-listed species in policies on land use and resource protection. Legally, the federal species must receive greater emphasis in management programs.

32. This was addressed in the environmental consequences section of the environmental impact statement.

3. Page 161, line 1, insert: "There are twelve federally listed and 32 Minnesota species listed as threatened or endangered in the corridor (see Table 5). There could be impacts to these species with increased visitor use and motorized boating under the proposal.

33

VI. CULTURAL RESOURCES MANAGEMENT

A. Native American Cultural Sites

The draft CMP and EIS do not discuss any potential impacts to Native American cultural resources. A complete inventory of Native American cultural sites should be conducted before any further development occurs anywhere in the park. Potential impacts to these sites should be analyzed and Native American groups should be consulted before any changes are made in these locations.

34

From there, a Cultural Resources management plan should be implemented as quickly as possible to assure the integrity of the cultural resources within MNRRA. Native American individuals and groups should be actively recruited for cultural resource staff, and advisory group positions.

The section of the EIS, Impacts to Cultural Resources (p.162) states that "nothing in the plan would contribute to the degradation or loss of cultural resources." However, no information is given to validate this conclusion. Trail construction, new boat ramps, increased use of the corridor and other activities promoted in the CMP could possibly degrade Native American and other cultural sites. This is especially applicable to buried and unmapped cultural resources.

330

Language Changes Needed

1. Page 162, Impacts to Cultural Resources section, line 29, ~~delete: Nothing in the plan would contribute to the degradation or loss of cultural resources~~. Insert: A primary goal of the proposed plan is for the non-degradation and preservation of cultural resources.
Increased ..."

35

2. Page 42, Cultural Resources Management section, "Proposed Policies & Actions" subsection, line 28, insert:

(1) A complete inventory of Native American cultural sites will be conducted before any development occurs anywhere in MNRRA.

36

33. This comment was addressed in the environmental consequences section of the final environmental impact statement.

34. The National Park Service does not have the authority to implement a freeze, nor are the corridor communities likely to support a freeze on development pending a complete inventory of Native American sites in the corridor. The plan supports additional inventories of Native American sites and encourages their protection.

35. The commenter's recommended revision is not an impact and therefore was not incorporated. However, additional emphasis on preserving cultural resources was added to the plan.

36. See response to comment O-3-34.

37 (2) Native American groups will be consulted before any development occurs in close proximity to any Native American cultural sites.

38 (3) Native American individuals and groups will be offered positions on any cultural resources advisory groups.

39 3. Page 47, **Cultural Resource Research Needs** section, line 20, insert: "...exists. In consultation with Native American groups, a complete inventory of Native American cultural sites will be completed as soon as possible.

B. Other Cultural Issues

The **Cultural Resources** section of **Affected Environment** beginning on page. 123 plan has several major areas of concern. The section title, **White Settlement and Growth of Communities (p.125)** and the term "white settlement" is offensive and exclusive. Since no one knows the racial composition of all of the non-indigenous settlers, the term "white" should not be used. "Settlers," "non-native settlers," "colonists," "non-indigenous settlers" or other non-offensive terms should be used in place of "white settlers" throughout the entire MNRRA plan.

The **Cultural Resources** section in general does a poor job of providing information and discussing the diversity of human cultures that have settled and used the Mississippi River in the park. The CMP and the EIS focus on cultural resources in a primarily historical context. The National Park Service must change its analysis of cultural resources to fit the urban setting of MNRRA. Contemporary cultural communities deserve just as much inclusion and consideration in the plan as historical communities. The plan does an injustice to the MNRRA region by neglecting the people who live here today.

The **River as a Metropolitan Presence (p.127)** attempts to discuss contemporary cultures but fails. Only one-half a page is devoted to this section and the only cultural groups mentioned are "Hispanic," "Jewish," and "eastern European." This entire section needs to be re-written to include the many other cultural groups that have settled the entire MNRRA corridor and bring the discussion into the 1990's. Events of the 20th century are barely mentioned.

Language Changes Needed

40 1. Pages 125 and 126, delete all the terms "white" as in "white settlement" and replace" with "non-native settlement."

331

37. A statement was added to the plan that encourages consultation with Native American groups when development could affect a Native American cultural site.

38. This would be a priority if such groups are established.

39. The plan was revised to place more emphasis on completing archeological site inventories.

40. The term "white" was removed from the subject text.

COMMENTS

VII. SOCIOECONOMIC RESOURCES

MNRRA should provide benefits and opportunities to the wide spectrum of people who live in the areas surrounding the corridor. Programs, facilities, information and the MNRRA planning process must be accessible to all. The NPS should conduct outreach, especially in disadvantaged communities to assure balanced representation in the future development of MNRRA.

This section of the plan (pp.134-142) fails to give an analysis of contemporary social conditions in MNRRA. Contemporary cultures are almost missed entirely except for some basic demographic data. The NPS must evaluate and discuss the socio-cultural resources of MNRRA differently than they would analyze a more isolated, nature dominated park. There are adequate data sources in this metropolitan region to provide the basis for a more thorough analysis than the CMP or EIS provide. Diverse cultures such as the Hmong, Afro-American, and Italian communities have a place and purpose in the corridor. They and others need to be included in the plan so their stories can be told in greater depth in the development of MNRRA.

41

VIII. VISITOR USE MANAGEMENT

The Visitor Use Management section of the plan (pp.50-52) errs by excluding social carrying capacity. In a densely populated area such as the Twin Cities, a social carrying capacity analysis is needed. Since the CMP "proposes to attract more visitors to the river" (p.50), the plan needs to address the implications of increased use. For anyone who has used the pedestrian walk and bikeways along both sides of the River Gorge area, it is apparent that user conflicts exist.

42

We strongly support the Visitor Use Management section of Alternative Plan B (p.98) which offers more attention to both natural resource protection and social carrying capacity issues. We recommend substituting this visitor use management section for the one in the proposed plan.

IX. CORRIDOR TRAIL SYSTEM

CBE strongly supports a continuous trail system along the entire length of the park and the role of the NPS in facilitating the timely development of this system. The language of the Open Space and Trails section of Alternative Plan B (p.95) should be substituted for the trail section of the proposed plan. The NPS

43

RESPONSES

41. This section is considered adequate for a comprehensive management plan. Additional sociocultural data needs would be considered during preparation of the resources management plan.

42. The plan was revised to acknowledge that some areas are already heavily used and additional use would not be encouraged in these areas. Social carrying capacity would be addressed in the visitor use management program.

43. The plan attempts to do just these things while clearly recognizing that it is not feasible in all areas to have the trail right on the riverfront. Considerable opposition has been generated by the proposal for continuous open space and trails, even though such an idea has been present in various plans in the area for at least 20 years. The National Park Service would serve as a facilitator, coordinator, and funding agent rather than as a direct land manager and trail developer. Local governments would be key to implementing these goals.

must take the lead role assuring that all communities along the corridor cooperate in building the system. Promoting this trail should be the number one recreational goal of the plan.

Increasing access to the river for the diverse communities in the area must be a key element of the plan, except where open space, critical habitat and wetlands need protection. Many of the existing corridor trail are crowded, need improvements, have user conflicts, and need to be integrated into a regional trail network.

X. LAND USE AND PROTECTION POLICIES

44 The proposed MNRRA plan reaffirms local control over land use. Emphasis is on the 300 foot corridor leaving the rest of the corridor to existing zoning and regulations. We believe that given the rapid decline in the amount and quality of open space in the river corridor, the plan should give the NPS more control over corridor land use decisions. Too much has been permanently lost to development through existing land use practices. With nearly 20,000 acres of undeveloped land, MNRRA provides us with a great opportunity to preserve our remaining open spaces for restoration, wildlife and minimum impact recreation. The NPS should pay special attention to undeveloped lands adjacent to the 300 foot corridor for protection.

45 The proposed plan exempts land behind levees from the 300 foot regulations even if they are located in this zone. These areas ~~should not be exempted and must be included in the 300 foot~~ regulations.

We support the adoption of the Open Space and Trails section of Alternative Plan B.

Language Changes Needed

46 1. Page 24, Location Policies section, line 29, delete: ~~"Areas behind existing levees would be an exemption to this 300 foot riverfront use policy because they are normally physically and aesthetically cut off from the river and usually already heavily committed to industrial uses. This exception would not apply to additional areas that are afforded flood protection behind new levees, and the proposed riverfront policy would be in affect."~~

XI. COMMERCIAL NAVIGATION

Commercial, industrial, or other economic uses of the river

44. The plan was revised with subheadings to clarify that only the first three location policies apply to the riverfront area. The other location policies and most of the site development policies apply to the entire corridor. While it might be desirable to manage land in the entire corridor with equal intensity, this riverfront area was chosen for special emphasis because it contains most of the river-related resources that led to the area's designation as a unit of the national park system. It coincides with the state shoreland management area, thus simplifying land use management activities for the area. The riverfront policy was simplified in the final plan, which should also reduce the impression that the land use policies cover only the riverfront area.

45. See response to comment G-8-2. The levee exception was deleted.

46. The levee exception was deleted.

should not take precedence over other uses. Barge traffic should not dominate the use of the river but share it with other users.

47 A study should be conducted to determine the best and safest navigational techniques that commercial vessels can use on the river to produce an environment conducive to small recreational boating. Barge operators and pleasure boaters should be informed and educated to use safe boating practices on the river.

Barge fleeting activities, barge cleaning areas, and other commercial river sites should be carefully monitored to assure industry compliance with pollution prevention and control regulations.

48 The barge traffic and fleeting studies cited on page 37 present conflicting data. The NPS should prohibit any expansion of existing barge fleeting sites or the establishment of new sites in MNRRA until an accurate assessment of barge traffic levels is produced.

We support the **Commercial Navigation section of Alternative B**; this should be substituted for the corresponding section in the **Proposed Plan, pp. 34, 37-38.**

Language Changes Needed

1. Page 37, line 13 and 14, delete: ~~"Commercial navigation is well established in the corridor; it is expected to grow, but not dramatically during the life of this plan."~~

334

49 2. Page 37, Proposed Policies & Actions section, line 33, insert:
(1) Require that only double-hulled barges be allowed to use the MNRRA corridor.

XII. GENERAL COMMENTS

This section addresses concerns that do not occur in one specific area of the plan but may be found in several sections and/or throughout the plan.

50 The term "working river" is not used in the enabling legislation but is used and emphasized in the draft CMP and EIS. If this term is used it should be balanced by terms that describe the ecological significance of the river. Terms such as "natural river," "riverine ecosystem," "natural system,"and/or "natural area" could be used. There is not an analogous ecological term for the river in the glossary to balance the use of the term

47. This would be considered in the surface water use management plan and visitor use management program.

48. This is a concept included in alternative B, which was not selected as the proposed plan. The prohibition was not considered necessary under forecasts in previous studies, and it could restrict the activities of the industry too much. This concept was strongly opposed by business and industry representatives on the commission and associated commercial interest groups. This issue would be a primary subject of the proposed surface water use management plan.

49. Double-hulled barges would be required for transporting hazardous cargo under existing federal law and Coast Guard regulations by the year 2003 (for barges over 5,000 tons gross weight). Policy number 11 in the MNRRA plan under Natural Resources Management advocates an accelerated conversion for traffic using the MNRRA corridor. It was revised to include consideration of barges under 5,000 gross tons, which are currently not included in the phase-out deadline. A regulation requiring an accelerated conversion of all barges may require an amendment to the existing federal legislation that calls for the phasing out of single-hull barges.

50. Natural river terms were added as suggested in selected places in the plan.

working river. As it stands, the CMP and EIS appear to favor the utilitarian aspect of the river over its other characteristics.

The Glossary of Terms should include the following:

51 **NATURAL RIVER**--"A stream of fresh water which for at least part of the year is larger than a brook or creek, and flows by a natural channel, being confined within banks, into the sea, or into a lake, or into another river" (Moore 1967). A natural river is characterized by a diversity of aquatic species and habitats, intact wetlands and a non-altered floodplain where bio-physical systems and processes have not been severely disturbed by humans.

52 **RIVERINE SYSTEM**--The riverine system includes all wetlands and deepwater habitats contained within a river channel. The riverine system is bound on the landward side by upland, by the channel bank, or by wetland dominated by trees, shrubs, persistent emergents, emergent mosses or lichens (Cowardin, et. al. 1979).

53 --The term "integrated" should be substituted for "balance." Integrated is used in the enabling legislation (Sec. 703. (a) and Sec. 711. (a)) and should have precedence over "balance." The use of the term "balance" is a distortion of the intention and selection of the term "integrated" in the MNRRA legislation. The plan should adhere to the language in the legislation as much as possible.

335

Language Changes Needed

1. Page 10, line 4, change: "define and achieve ~~balance~~ integration among..."

2. Page 19, line 17, change: "This crucial ~~balance~~ integration between..."

3. Page 20, Land Use and Protection Policies, General Policies section, line 3, change: "based on ~~a balance~~ the integration between resource..."

4. Page 37, line 16, change: "areas, and ~~balance~~ integrate the needs..."

5. Page 174, line 2, change: "could be ~~a balance~~ an integration between..."

51. A definition similar to this was added to the glossary in the final comprehensive management plan/environmental impact statement.

52. A definition similar to this was added to the glossary.

53. There were comments that supported the use of the term "balance" and comments opposed to the term. The actual term used is probably less important than whether the commission and, ultimately, the secretary of the interior feel the plan has met the intent of the MNRRA legislation and will accomplish the visions identified to guide the development of the plan. Compelling arguments were not provided in the comments to change the existing terminology. The document was revised, however, to add the word "integrate" where it provides clarification.

BIBLIOGRAPHY

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General Accounting Office (GAO). 1990. Protecting Parks and Wilderness From Nearby Pollution Sources. Washington, D.C.: U.S. General Accounting Office. GAO\RCED-90-10.

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Metropolitan Waste Control Commission (MWCC). 1990. 1990 River Quality Data Report. St. Paul, MN: Metropolitan Waste Control Commission.

Minnesota Department of Health (MDH). 1993. Minnesota Fish Consumption Advisory, May 1993. St. Paul, MN: State of Minnesota.

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Moore, W. G. 1967. A Dictionary of Geography. New York: Frederick A. Praeger, Inc.

REAP

River Environmental Action Project

P.O. Box 374, South St. Paul, MN 55075 tel. 451-1038

August 16, 1993

Superintendent
Mississippi National River and Recreation Area
175 East Fifth St., Suite 418, Box 41
St. Paul, MN 55101

Re: MNRRA Management Plan and E.I.S.

Dear Mississippi River Coordinating Commission:

This is a response from the River Environmental Action Project (REAP) to the draft plan. REAP is a grassroots, volunteer organization in South St. Paul. We have not finished studying the plan in its entirety, so there may be future additional comments.

First, we want to congratulate the Coordinating Commission and NPS staff for the work they have done. Having followed this process from the beginning, we are very impressed with the results in the given period of time. Over-all, this is a good plan which just needs fine tuning, but we are concerned as to the direction it will take. Our group believes any changes should be in favor of "Alternative B". If there is an imbalance in emphasis, let it be in favor of the environment which has been neglected and in favor of unreplaceable open spaces and wetlands.

1 Our organization has worked hard to help create a trail along the river in South St. Paul and we support connecting that trail to a greenbelt and corridor along the MNRRA corridor. We believe this should be a top priority, second only to protecting natural areas. Because we in South St. Paul have had no public access to the river in the past, we are very aware of the need for citizens to know and respect the river through access and education about it. We support those goals.

2 Because REAP is a South St. Paul organization, we are also aware of the economics impact of the river that needs to be protected. We support an exception to the 300-foot set back and riverfront use, but do not believe it should be a "blank check" exception, but rather specifically refer only to the first three examples that would normally be discouraged as shown on page 25.

3 Also, as South St. Paul citizens, we are particularly interested in page 29 (11) regarding bridges as the 494 (Wakota) Bridge is in dire need of expansion. A compatible bridge next to the existing one would solve the traffic bottleneck,

4 if the terrain will accommodate it. We support walking and bike areas on all new or renovated bridges.

5 As was stated at the hearing at Inver Hills College, the need for citizens participation needs to be addressed. The Coordinating Commission is set by law, but many communities do not feel represented and there is a need for a citizen and/or municipality advisory commission.

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1. A statement was added to the plan saying that connecting trails would be a high priority.

2. See responses to comments G-8-7 and G-10-1.

3. This is a site-specific issue. See responses to comments G-17-9 and G-22-1.

4. The plan supports this concept in policy number 6 in the Open Space and Trails section and policy number 3 in the Visitor Use Management section.

5. The plan was revised to emphasize that public participation would continue during plan implementation. The makeup of the commission is established in the legislation, but this may be reconsidered when the commission sunsets in 1998.

there seems to be some dissention to the Metropolitan Council's role as an implementing agency. We are not opposed to their role, but if there is a change contemplated, the National Park Service should be the agency to share implementation responsibilities. There needs to be protection and coordination of the MNRRA Plan.

6 We support the clean air and water goals of the plan and appreciate the new emphasis on non-point pollution, but the point pollution also needs to be addressed. Many businesses are taking the initiative and working at cleaning the environment, but there will probably always be some who will not.

Thanks for your good work and for your consideration.

Sincerely,

THE REAP COUNCIL

Margaret Hall, Chair
Lucy Kruchowski, Vice Chair
Lucille Sanford, Secretary
Mel Bergstrom
Geraldine Leonard
Nancy Lundquist
Betty Thompson
Jodelle Ista
Kay Schmidt
John Parks

Lois Swanson, Coordinator

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6. Both point and nonpoint pollution were addressed in the plan. The text was clarified to state that there would be an emphasis on nonpoint pollution, but point source pollution would still receive due consideration.



Thomas Irvine Dodge Nature Center

1795 CHARLTON STREET
WEST SAINT PAUL, MINNESOTA 55118
(612) 455-4531
FAX (612) 455-2575

August 13, 1993

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EXECUTIVE DIRECTOR

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Ms. JoAnn M. Kryal, Superintendent
Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418
Box 41
St. Paul, MN 55101

Dear Ms. Kyral:

1 *In reviewing the Draft Comprehensive Management Plan for the Mississippi* National River and Recreation Area I noticed that the map on page 63 did not show the Dodge Nature Center, the Belwin Nature Center, the Harriet Alexander Nature Center, the Maplewood Nature Center and the Tamarack Nature Center, among others (see attached list). I also found no mention in the document of these nature centers, the programs they offer, and how your proposed facility and programs might, at apparent great expense to taxpayers, duplicate and potentially undercut existing institutions.

At the Dodge Nature Center we now have 35,000 student visits to our programs each year from schools in the immediate geographic area in which your center is proposed to be located. I would like to see a clear statement in your report of the K-6 and other educational and interpretive programs you propose to offer, how they would be financed and the justification for duplicating, to the extent you would be, what is already provided for this area by the nature centers listed above.

Prior to spending major sums in taxpayers dollars, *I suggest that you and our* U. S. Senators and congressional representatives tour the recently built Minnesota Valley Wildlife Refuge which is similar in size to your proposed facility. Are you aware of how few visitors they seem to have to their building? I have visited the building and it has always been almost devoid of other visitors. Others have that same impression. I suggest you examine closely your data about projected use. *Does your data factor in that some of the visits may occur at the expense of* other environmental education institutions?

Recycled Paper

1. The map and list is not intended to be exhaustive. Additional inventory would occur during follow-up interpretive planning.

COMMENTS

2 I look forward to your response and to a fuller discussion in the next draft of the extent to which your facility will duplicate existing programs provided by nature centers, the justification for doing so, and a discussion of why you would expect your facility to be more successful in attracting people than the Minnesota Valley building.

3 While I am enthusiastically supportive of your goal of providing environmental education opportunities to as many people as possible, I am concerned for my institution that the issue of duplicating services and the resulting potential damage to us and other existing institutions is dismissed in this document by avoiding the issue or by vague statements of "coordinating" with existing institutions. The fact that so many existing nature centers in this area are not mentioned in the text or shown in the map on page 63 does not give me confidence in the coordination to which the document alludes.

Do call me at 455-4531 if you have questions or if I can assist you in any way.

Sincerely,

Gregory J. Lee
Executive Director

GJL/plv

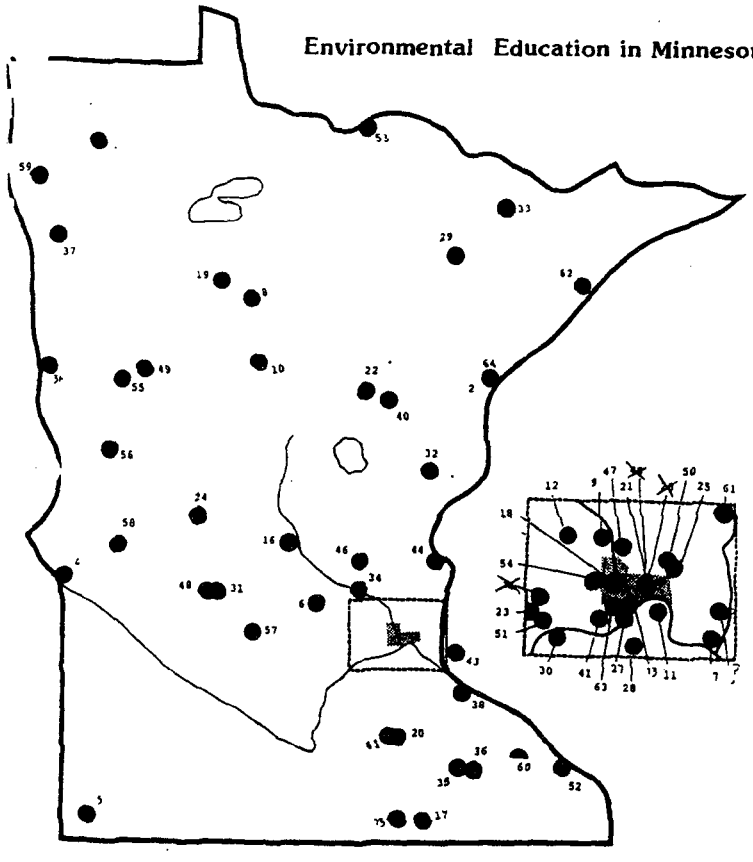
cc: U. S. Senator, David Durenberger
U. S. Senator, Paul Wellstone
U. S. Congressman, Bruce Vento, 4th District

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RESPONSES

2. The National Park Service would not duplicate but would supplement other facilities.

3. Text was added to indicate that the National Park Service would avoid competition with existing interpretive facilities in the area.



compiled by Minnesota Naturalists Association
c/o Wolf Ridge ELC. 230 Cranberry Rd. Finland, MN. 55603

COMMENTS

RESPONSES

FACILITIES

1. Agassiz NWR
Middle River, MN
56737 (218) 449-4115

BMCA Superior NF
515 W. 1st St. Rm 338
Duluth, MN 55801
(218) 727-6692

2. Belwin Outdoor Ed. Lab.
1553 S. Stagecoach Tr.
Afton, MN 55001
(612) 436-5243

3. Big Stone NWR
25 NW 2nd St.
Ortonville, MN 56278
(612) 839-3700

4. Blue Mounds St. Pk.
Rt. 1, Luverne, MN
56156 (507) 283-4892

5. Camp Courage, E.E. Overnight Ctr.
Rt. 1, Maple Lake, MN
55358 (612) 963-3121 x20

6. Carpenter Nat. Ctr.
12805 St. Croix Trail
Hastings, MN 55033
(612) 437-4359

7. Chippewa Nat. Forest
Cass Lake, MN 56633
(218) 335-2226

8. Coon Rapids Dam Reg'l Pk.
9750 Egret Blvd.
Coon Rapids, MN 55433
(612) 757-4700

9. Deep Portage Cons. Reserve
RR, Hackensack, MN
56452 (218) 682-2325

10. Dodge Nat. Ctr.
1795 Charlton St.
W. St. Paul, MN 55118
(612) 455-4531

--- Eastman Nat. Ctr.
13351 Elm Creek Rd.
Osseo, MN 55369
(612) 420-4300

11. Fort Snelling St. Pk.
Hwy. 5 & Post Rd.
St. Paul, MN 55111
(612) 727-1961

12. Gray Freshwater Biol. Inst., 2500 Shadywood Rd.
Navarre, MN 55392
(612) 471-8476

13. Helmer Myre St. Pk.
Rt. 3, Bx 33, Albert Lea,
MN 56007 (507) 373-5084

14. Hennepin Park. Nat. Ctr.
225 33rd Ave. S.
St. Cloud, MN 56301
(612) 255-7255

15. Hormel Nat. Ctr.
Bx 673, Austin, MN
55912 (507) 437-7519

16. J.F. Bell Museum of Nat.Hist.
U of M, 10 Church St. S.E.
Mpls., MN 55455
(612) 624-1852

17. Lake Bemidji St. Pk.
Rt. 5, Bx 44, Bemidji, MN
56601 (218) 751-1472

18. Faribault State Hospital & Sch.
Outdoor Ed. Dept, Rogers Bldg.
Faribault, MN 55021
(507) 332-3492

Lee & Rose Warner Nat. Ctr.
30 E. 10th St., St. Paul, MN
55101 (612) 221-9444

19. Long Lake Conservation Ctr., Pallsade, MN
56469 (218) 768-4653

20. Lowry Nat. Ctr.
Rt. 1, Bx 690, Excelsior,
MN 55331 (612) 472-4911

21. Luther Crest Camp
Rt. 5, W. Lake Carlos,
Alexandria, MN 56308
(612) 846-2431

22. Maplewood Nature Center
2659 E. 7th St., Maplewood,
MN 55109 (612) 738-9383

23. Minnesota Historical Soc.
(23 sites-write for info)
Ft. Snelling Hist. Ctr.,
St. Paul, MN 55111
(612) 726-1171

24. Minnesota Valley NWR
4101 E. 78th St.
Bloomington, MN 55420
(612) 854-5900

25. Minnesota Zoological Garden
12101 Johny Cake Rdg. Rd.
Apple Valley, MN 55124
(612) 432-9010

26. Mounds View North ELC
Rt.1, Bx 806, Britt, MN
55710 (612) 636-3650 X187

27. Murphy's Landing
2187 E. Hwy 101, Shakopee,
MN 55379 (612) 445-6900

28. New London NFH
P.O.Bx 304, New London,
MN 56273 (612) 354-2310

29. Northwoods Audubon Center
Rt.1, Sandstone, MN
55072 (612) 245-2648

30. North Woods Resource Ctr.
1761 University Av.St. Paul
MN 55104 (612) 645-6605

31. Oliver Kelly Farm
15788 Kelley Farm Rd.,
Elk River, MN 55330
(612) 441-6896

32. Oxbow Nat. Ctr.
Rt.1, Bx 170, Byron, MN
55920 (507) 775-2451

33. Quarry Hill Nat. Ctr.
701 Silver Creek Rd.,
Rochester, MN 55904
(507) 281-6114

34. Red River Natural Hist. Area
U of M, Crookston, MN 56716
(218) 281-6510 Ext. 206

35. Red Wing Env. Learning Ctr.
Friedrich City Ctr., Red Wing,
MN 55066 (612) 388-7339

36. Barlage Center for Science
Moorhead State Univ.,
Moorhead, MN 56560
(218) 236-2904

37. Rice Lake NWR
Rt.2, McGregor, MN
55760 (218) 768-2402

38. Richardson Nat. Ctr.
8737 E. Bush Lake Rd.
Bloumington, MN 55438
(612) 941-7993

39. River Bend Nat. Ctr.
Bx 265, Faribault, MN
55021 (507) 332-7151

40. St. Croix Env. Ctr.
YMCA Camp St. Croix, Co.
Rd. F, Hudson, WI
54016 (612) 436-8428

41. St. Croix Wild River
St. Pk., Rt.1, Bx 75
Center City, MN 55012
(612) 583-2125

42. Science Museum of MN
30 E. 10th St.
St. Paul, MN 55101
(612) 221-9488

43. Sherburne NWR
RR 7, Zimmerman, MN
55398 (623) 389-3323

44. Springbrook Nat. Ctr.
100 85th Ave. N.E.
Fridley, MN 55432
(612) 784-3854

45. Sibley St. Pk.
Rt. 2, Bx 600,
New London, MN 56273
(612) 354-2055

46. Tamarac NRW
RR, Rochert, MN 56578
(218) 847-2641

47. Tamarack Nat. Ctr.
2015 Van Dyke St.
Maplewood, MN 55109
(612) 429-7787

48. U of M Landscape Arboretum,
3675 Arboretum Dr.
Chaska, MN 55318
(612) 443-2460

49. Upper Miss. River Wildlife & Fish Refuge
51 E.4th St., Rm.101,
Winona, MN 55987
(507) 452-4232

50. Voyageur Nat'l Park
Bx 50, Int'l Falls, MN
56649 (218) 283-9821

51. Westwood Hills Env. Ed. Ctr., 8300 W. Franklin,
St. Louis Pk., MN 55426
(612) 924-2544

52. WMD Detroit Lakes
RR 3, Bx 47D, Detroit
Lakes, MN 56501
(218) 847-4431

53. WMD Fergus Falls
Rt.1, Bx 26A, Fergus
Falls, MN 56537
(218) 739-2291

54. WMD Litchfield
305 N. Sibley,
Litchfield, MN 56537
(612) 693-2849

55. WMD Morris
Rt.1, Bx 208,Mill Dam Rd.
Morris, MN 56267
(612) 589-1001

56. Wetlands,Pines,Prairie Audubon Sanctuary, RR2
Warren, MN 56762
(218) 745-4457

57. Whitewater St. Pk.
Rt.1, Bx 256, Altura, MN
55910 (507) 932-3007

58. Wilder Forest
14180 Ostlund Tr. N.,
Marine St. Croix, MN
55407 (612) 433-5198

59. Wolf Ridge E.L.C.
230 Cranberry Rd.,
Finland, MN 55603
(218) 353-7414

60. Wood Lake Nat. Ctr.
735 Lk. Shore Dr.,
Richfield, MN 55423
~~(612) 861-9360~~

ABBREVIATIONS: (NWR)National Wildlife Refuge; (NF)National Forest; (St.Pk.)State Park;
(Nat.Ctr.)Nature Center; (NFH)National Fish Hatchery; (Cons.)Conservation

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Robert Piram
Executive Director and Secretary
Peggy Lynch

September 8, 1993

TO: JoAnn Kyral, Superintendent, Mississippi National River and Recreation Area
Members of the Mississippi River Coordinating Commission

RE: Response to the Draft Comprehensive Management Plan / EIS

The Friends of the Parks and Trails of St. Paul and Ramsey County welcome the opportunity to review and comment on the Comprehensive Management Plan and Environmental Impact Statement for the Mississippi National River and Recreation Area.

The Mississippi River has had great historical impact on the City of St. Paul. In its early history St. Paul was entirely dependent on the river, bringing settlers and supplies to the area. St. Paul is the head of navigation and river trade was central to St. Paul's early growth.

St. Paul also has the largest area of shoreline on the Mississippi River within the MNRRA corridor. There are large parks; natural areas such as the Pig's Eye area which accommodates one of the largest heron and egret rookeries in an urban area; commercial and industrial development; and large areas set aside for the fleeting of barges.

The Friends strongly agree with the language of the legislation which states that the Mississippi River represents a nationally significant historical, recreational, scenic, cultural, natural, economic, and scientific resource. We agree that the significant values of the waters and land of the Mississippi River Corridor must be protected.

The Friends applaud the time and effort of the National Park Service staff and the members of the Mississippi River Coordinating Commission for the time and effort that has been spent to produce the Comprehensive Management Plan and Environmental Impact Statement.

The Friends:

* support the concept of a continuous linear park along both sides of the River which will allow people to get close to the River and provide an opportunity for pedestrians and bicyclists to traverse the corridor.

* support policies and actions which will provide for improvement of water quality and the reduction of air pollution.

* support policies and plans to protect and restore wetlands in the corridor.

* support policies and actions which will ensure that both recreation and industrial uses of the river corridor can be accommodated in a safe environment.

* support NPS interpretive center at Harriet Island. As St. Paul is the head of navigation on the Mississippi River and St. Paul is the Capitol City, it is important that this center be located in St. Paul.

GENERAL RECOMMENDATIONS:

1

1. Change "balance" to "integrated". *Integrated is used in the law and* definition in document "made into a whole; unified; or joined together. All elements of an integrated plan or integrated effort to resolve an issue are analyzed and factored together to make better decisions." Balance could be interpreted to mean an acre for acre division between industrial, commercial and recreational use.

1. "Integrate" was added in several places in the final plan.

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COMMENTS

2 **2. Include a chart stating what agency is responsible for each implementation action; if legislation is needed to empower agency; whether it be local, state or federal legislation; and timeline for completion.**

3 **3. There should be incentives included to see that each agency completes its designated job. Alternatives should also be included to allow other agencies to complete job if designated agency does not do it; such as, if an agency does not complete plan within a certain time frame, another agency can then step in and complete job.**

4 **4. Public should be given opportunity to review and comment on the revised plan and other related implementation documents.**

The Friends offer the following comments on the Comprehensive Plan/EIS:
Words underlined are additions:

ISSUES:

P. 2. lst paragraph. "The final management plan is scheduled for completion in early 1994. The Park Service and the commission would then coordinate with others to prepare more

5 detailed strategies and work to implement the plan for the corridor. This would include a broad spectrum of partners, including state and regional agencies, local governments, and the private sector, which will include a representative from the environmental community."

P. 9 - COMMENT: Fourth paragraph mentions wastewater treatment in the TC area. There is an internal study of the treatment plant at Pig's Eye to see how they can increase

6 capacity. This would have a major impact on the park property at Pig's Eye and is within the MNRRA boundaries. This should be mentioned and guidelines established for dealing with treatment plants within the corridor.

P. 17. Last paragraph - "While it is important for communities to show strong support for the MNRRA plan and provide consistency in river corridor management, it is recognized that individual communities must retain flexibility to address unique issues and special situation. Policies proposed in this plan must be implemented in a practical manner considering the specific issues in particular cases. Practicality and feasibility would be part of all the policies

7 and actions that follow. This should not, however, diminish the overall commitment to coordinated resource preservation, protection, and enhancement in the Mississippi River corridor." "In this plan, the words "practical manner" should mean favoring the concept and implementation of the plan."

8 COMMENT: Leave this paragraph in and delete all other references to "where practical". There are about 14 or 15 "where practical" statements in the proposal. Leaving that phrase in is redundant and weakens the entire document. However, if the phrase "where practical" must be left in, it is understood that "where practical" means favoring the concept and implementation of the plan.

LAND AND WATER USE
Planning Assumptions - P. 18

* "The metro area is growing and much of the land in the corridor is developed or will be developed in the next 10-15 years." **COMMENT: GOOD.** This supports restrictions in recommendations on building within the 300 ft. corridor.

* "This plan should not weaken any existing local policies and it should exceed them when necessary to protect sensitive resources, take advantage of a coordination opportunity, or resolve a critical corridor wide management issue." **COMMENT: GOOD** This supports the governmental units that have done a good job in setting policies which protect sensitive areas, and allows for state? or federal? agency to strengthen weak management policies.

RESPONSES

2. This is beyond the scope of a comprehensive management plan.

3. This is beyond the scope of a comprehensive management plan. Implementation details would be developed later.

4. The public was given additional opportunities to comment on the revised plan, and statements were added to the final plan committing to public involvement during development of implementation plans.

5. The subject text was revised to add "interested organizations."

6. The Pig's Eye plant is a site-specific issue. There are relatively few treatment plants in the corridor and specific guidelines would appear unwarranted.

7. This definition would confuse the issue and was not adopted.

8. Deleting the subject "where practical" statements was not supported by the commission.

P. 1.9 * Commercial navigation is well established in the corridor: it is expected to grow, but not dramatically, during the life of this plan. Barge fleeting needs will grow somewhat, but are not expected to exceed mid-1980s levels during the next 10-15 years. **COMMENT: GOOD.** This refutes the argument that more fleeting is needed.

LAND USE AND PROTECTION POLICIES
General Policies

9 **P -20** Last paragraph - mentions not going beyond government policies for enforcing floodplain management standards on private lands. **COMMENT:** In light of present flooding this year, there should be discussions about the advisability of building in the floodplain and the cost to everyone of private development in the floodplain.

10 **P. 23** - 1st paragraph - "New land use and development in the riverfront area (the first 300 feet back from the river) would include those activities relating to or requiring a location next to the river, activities preserving historic structure located along the river, or activities enhancing the riverfront." **COMMENT: GOOD** - In light of the Planning Assumptions (above) that much of the land in the corridor will be developed within the next 10 to 15 years, it is important to reserve that land for river related uses, or public uses that would allow public access to the river.

11 **P. 23** "(4) Design guidelines would be administered at the local level..." **COMMENT:** Should include statement on uniformity of guidelines for the different communities. Who is ultimately responsible for design guidelines? Who would OK them? Will there be some oversight by regional, state or federal agency to see that the design guidelines are uniform?

P. 24 Location Policies
(1) Again mentions "new development...should have a relationship to the river.
COMMENT: GOOD

12 **P. 25** - last paragraph - **COMMENT:** The exemptions from the location policies are too broad and should be eliminated. A case could be made for any of the preceding types of activities to be located within the 300 ft. corridor.

PP. 26-28 Site Development Policies - COMMENT: Agency with a view which encompasses the geographical area of the corridor should have ultimate authority.

P. 29 (ll) "Increase the capacity of existing bridges in preference to constructing additional bridges, except where new bridges are included in approved metropolitan area plans. Develop parallel architecturally compatible bridges next to existing bridges to increase capacity instead of new, separate bridge crossing in the same traffic corridor." Add pedestrian walkways and bikeways on existing bridges and all new bridges.

13

14 **P. 29** - Add policy on protecting and restoring wetlands.

PP 30 - 34 Open Space and Trails Concept
Substitute Alternate B, PP 95 - 96

PP. 33-34 PUBLIC LAND OWNERSHIP
Proposed Policies & Actions

15 **P. 34 - (5)** "Require new major private development and all public facilities to provide appropriate public trails and river access where specified by this plan or other community corridor plans." **COMMENT:** (What is definition of major? Some parameters should be set here).

16 **(9)** "Prevent lands acquired with federal recreation grant assistance from being converted to uses other than public outdoor recreation and open space." **COMMENT:** Present requirements are that grants be paid back if land use is changed. Is this enforced? If not, how can it be enforced?

3

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9. The MNRRA plan supports rigorous enforcement of existing floodplain management regulations and discourages building in the floodplain.

10. See responses to comments G-8-7 and G-10-1. The riverfront policy was revised and simplified but retains the basic concept of encouraging a river relationship.

11. While the National Park Service would encourage their use, the guidelines are merely advisory and would be used at the discretion of local government.

12. See responses to comments G-8-7 and G-10-1.

13. The emphasis on pedestrian/bike access across bridges was added to the subject policies in the plan with the qualification that it must be feasible from an engineering and safety standpoint.

14. The policy was already there under the Land Use and Protection Policies section but was repeated for emphasis in the Natural Resource Management section in the final plan.

15. This is beyond the scope of the MNRRA plan and would be defined in follow-up work with the Metropolitan Council and Department of Natural Resources.

16. The subject policy was revised to better explain the process.

COMMENTS

PP 34 to 38 - COMMERCIAL NAVIGATION
Substitute Alternative B, P. 96. "Commercial navigation activities and barge operations would continue to operate at current levels and existing fleeting areas would be protected. There would be a freeze on new fleeting sites, and existing fleeting areas would be maintained in their current state, which occupy about nine miles of shoreline in the corridor. New areas would only be allowed if research verified the necessity of the action and documented that there would be no adverse effect on natural or cultural resources. Comprehensive planning would include identification and mapping of all proposed fleeting sites in the corridor before any new ones are approved. No-wake zones and other surface use regulations would be established and enforced. The National Park Service would also cooperative with the commercial navigation industry and respective permitting agencies to ensure that natural and cultural resources are not impaired by current activities." Double hulled barges should be required by the year 19 ? .

17 **COMMENT:** Spill of hazardous materials on Mississippi River would be extremely detrimental to the environment. Date should be agreed upon when double hulled barges should be required.

COMMENT:
At the present time, 80 to 90% of the barge fleeting is within the city limits of St. Paul. This amounts to approximately 600 legal parking spaces for barges. This is mostly for business on the Minnesota River. When a business on the Minnesota River that uses barges for transportation expands, it puts more pressure on the fleeting in St. Paul. There has never been any acknowledgement of this fact. Cumulative effects of river commerce must be examined. The DNR was supposed to do a comprehensive study of barge fleeting back in the late 1970's before they issued any more fleeting permits. This was not completed. The DNR and Army Corps of Engineers (ACE) issue permits for fleeting **ONLY if they put pilings in the water to tie up the barges. If they put the pilings on land, they do not need a permit from either agency. Riparian land owners do have rights here. The DNR issues the permit through the Division of Waters. The ACE is only interested in the safety for navigation on the river. There is no agency looking at the environmental effects.**

18 The proposed plan does not take these facts into account. Because of the geographical configuration of the Mississippi River in St. Paul, there is a great deal of demand for fleeting in St. Paul. If barge fleeting is to expand, will they want fleeting next the the river parks? That is why it is important that Proposal B be used here.

The fleeting areas often tie up barges more than 3 wide (which is the general width barges can be fleeted.) The ACE does not have a boat which they use to monitor fleeting. They only respond to complaints from recreational boaters or riverboat pilots. The Coast Guard does have a boat, but the purpose of the ACE and the Coast Guard is to facilitate river transportation.

19 Any study of future fleeting needs should be carefully examined. The studies done in the 1970's greatly exaggerated the need for new fleeting sites. None of these projections were accurate.

P. 39 NATURAL RESOURCE MANAGEMENT
Pollution - ... "the river should be swimmable and fishable through the entire 72 mile length."
20 **COMMENT:** What is the timeline here? Does the PCA act as enforcer for point source pollution? If not, who should be enforcer?

P. 40-41 - Proposed Policies & Action
21 **COMMENT: These policies are good.** Add policies on superfund sites, hazardous waste sites, spill prevention and response, dredging methods and disposal.

- Who should be the agency involved in enforcing policies? What is the timeline? This must be included.

22 (26) Add policy on barge cleaning facilities.

P. 42 -47 Cultural Resource Management - Proposed policies
23 **COMMENT:** Determine if there are any Native American cultural sites. If there are the potential impacts to these sites should be analyzed and Native American groups should be consulted before any changes are made in these locations.

4

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RESPONSES

17. See response to comment O-3-49.

18. The Corps of Engineers and Department of Natural Resources evaluate environmental impacts in permit applications.

19. The MNRRA plan calls for updated studies and a surface water use management plan.

20. It is beyond the scope of the MNRRA plan to include a timeline; the Minnesota Pollution Control Agency would be the "enforcer."

21. There is a policy (no. 12) on Superfund sites in the Natural Resource Management section. There is a general policy on seeking cleanup of corridor lands (no. 7), and policy no. 22 covers toxic (including hazardous) waste. There is also a policy on spill prevention and response (no. 15). Dredging is addressed in a policy (no.7) under commercial navigation.

22. The National Park Service would work with the appropriate agencies and organizations to address this issue in the resources management plan.

23. Statements were added regarding such sites.

24 P. 48 - Economic Resource Research Needs. COMMENT: Analyses of fleeting needs done in the 1970's were far off the mark. Any projections of fleeting requirements need to to carefully scrutinized.

25 "Research should include more detailed analysis of local, regional, state and national government expenditures for parks and recreation resources, surveys, and analysis to determine recreation and other economic benefits and estimates of visitor recreation and tourism expenditures in the corridor." COMMENT: The economic value of tourism should be stressed.

26 PP 50-51 Visitor Use Management
"All general management plans for units of the national park system must, by law address the issue of carrying capacity."
P. 50 next to last paragraph - Add - Commercial navigation must be included in any study of carrying capacity of surface water use.

27 Add from Alternative B, P. 98: "the use of canoes, rowboats, kayaks, or other boats without motors would be encouraged. More liberal use of no-wake zones would also be encouraged to provide additional quiet zones in the corridor and protect shorelines. Tour boats and other visitor-oriented commercial enterprises would be promoted. Conflicts between uses would be settled in favor of those less damaging to the environment."

PP. 57-58 - NATIONAL PARK SERVICE INTERPRETIVE FACILITIES
28 p. 58 add - *provide information and orientation to local, regional and state units of government which have lands in the MNRRA corridor, i.e. Nature Center at Crosby Lake.

PP. 75 - 83 - PLAN IMPLEMENTATION
29 COMMENT - Enforcement powers should be given to the Metro Council and the Dept. of Natural Resources to enable them to implement the policies in the plan. Timelines should be set as to when the local plans should be completed.

30 p. 78 - The Corps of Engineers: COMMENT: this section should be changed to include how the environmental effects of commercial navigation and barge fleeting are to be evaluated. (Possibly the DNR?)

p. 82 - Streamlining regulations.
COMMENT: A section should be added about enforcement.

31 (3) "A small task force consisting of representatives of local government, the Metro Council, the MDNR, the MPCA, an industry representative, and a representative from the environmental community, could be charged by the governor with improving the process in a limited time frame."

32 Add from Alternative B p. 99-100: In addition to actions cited in the proposal, coordination and consistency would be accomplished under this alternative by:
* a federal requirement for local plans to conform to the MNRRA plan
* MNRRA commission veto power over major developments determined to be detrimental to corridor resources
* additional federal legislation to grant regulatory authority to the Park Service ~~and the Commission~~)
* greater leadership and oversight on commercial navigation management activities by the National Park Service ~~(and the Commission)~~.

Thank your for this opportunity to review and comment on the plan.

Sincerely,

Marsha Soucheray

Marsha Soucheray
President

5

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24. This is proposed in the plan. This would also be addressed in the proposed surface water use management plan.

25. This was added.

26. Carrying capacity under visitor use management, as defined by the National Park Service, would not normally include commercial navigation. It is keyed more toward visitor use and resource protection. However, a proposal for a surface water use management plan was added to the commercial navigation section, which would address river system capacity. The impacts on commercial navigation would be considered in recreation capacity management efforts.

27. This comment was incorporated into the final plan.

28. The series of functions was amended to include this comment.

29. Based on a review of the legislative intent and public comments on the draft plan, the commission and National Park Service have rejected an enforcement program in favor of an incentives approach by deleting the request for state legislation and emphasizing existing state authorities and the grant program. The commission and the National Park Service believe that specific timelines for local government plans are beyond the scope of the MNRRA comprehensive management plan.

30. This is beyond the scope of the MNRRA plan.

31. The text was revised to include other "interested organizations."

32. The commission and the National Park Service believe that the proposed plan best reflects the intent of the legislation and the preponderance of public input.

FRIENDS OF THE MISSISSIPPI RIVER
26 EAST EXCHANGE STREET SUITE 215
ST. PAUL, MN 55101-2264
(612) 222-2193

October 8, 1993

Ms. JoAnn Kyral
Superintendent
Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418, Box 41
St. Paul, MN 55101

Dear Superintendent Kyral:

The Friends of the Mississippi River, a new non-profit environmental organization, is pleased to present the attached comments on the June 1993 Draft Comprehensive Management Plan and Environmental Impact Statement for the Mississippi National River and Recreation Area. We are submitting these comments jointly with the Sierra Club North Star Chapter.

As you know, Friends is a new citizen organization now in formation dedicated to protecting, restoring, and enhancing the Mississippi River within the State of Minnesota, with a primary focus on the river segment designated by Congress as the Mississippi National River and Recreation Area (MNRRA). We believe that this federal designation presents a great opportunity to the Twin Cities area for protecting and enhancing the tremendous resources represented in the river corridor.

We are appreciative of the hard work of the National Park Service and the Mississippi River Coordinating Commission in completing this draft plan and particularly commend NPS staff for their cooperative attitude and willingness to listen to public input. We look forward to working with the the Park Service and Commission as the comprehensive management plan is completed and implemented.

Thank you for the opportunity to comment on this important document. If you have any questions or would like to discuss any of our comments further, please call the Friends' office, 222-2193. We wish you good luck in your efforts to create this new National River and Recreation Area.

Sincerely,

Brett Smith

Brett Smith
Project Consultant

See Sierra Club comment on following pages.



SIERRA CLUB
North Star Chapter

October 8, 1993

Ms. JoAnn Kyral
Superintendent
Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418, Box 41
St. Paul, MN 55101

Dear Superintendent Kyral:

The Sierra Club North Star Chapter is pleased to submit the attached comments on the June 1993 Draft Comprehensive Management Plan and Environmental Impact Statement for the Mississippi National River and Recreation Area. We are submitting these comments jointly with the Friends of the Mississippi River.

The Sierra Club is an environmental organization dedicated to the protection and preservation of the natural and human environment. Nationwide, the Club has over 600,000 members. In Minnesota, the North Star Chapter has over 9,000 members, the majority of whom live in the Twin Cities area.

The Sierra club has been involved in issues related to our National Park System for over 100 years, beginning with the activities of one of its founders, John Muir. We are excited about the possibilities of the Mississippi National River and Recreation area and are pleased to be able to participate in the process of its creation.

We appreciate the hard work done by staff of the National Park Service and by the members of the Mississippi River Coordinating Commission in completing this draft plan. We look forward to working with you in completing the Comprehensive Plan and in implementing this exciting project.

Thank you again for your work and the opportunity to comment on this draft. If you have any questions regarding our comments or the Sierra Club in general, please contact Brett Smith at 920-9569.

Sincerely,

Ginny Yingling
Conservation Chair
North Star Chapter

Brett Smith
Mississippi River Activist
North Star Chapter

1313 Fifth Street SE, Suite #323 • Minneapolis, MN 55414 • (612) 379-3853

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See responses to detailed comments on following pages

COMMENTS ON THE DRAFT COMPREHENSIVE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT
FOR THE MISSISSIPPI NATIONAL RIVER AND RECREATION AREA
SUBMITTED BY FRIENDS OF THE MISSISSIPPI RIVER AND THE SIERRA CLUB NORTH STAR CHAPTER
OCTOBER 8, 1993

COMMENT OVERVIEW

1. Increase the plan's natural, cultural, and recreational resource *protection emphasis*
2. Focus the plan on promoting sustainable development, rather than balance between competing interests
3. Clarify implementation approaches
4. Clarify and strengthen citizen role in implementation
5. Remove the multiple "where practical" references
6. Clarify the ranking of critical resource protection needs
7. Maintain a strong comprehensive plan
8. Remove unnecessary reference to state legislation
9. Clarify roles, responsibilities, and planning context
10. Strengthen protection and enhancement of the riverfront area
11. Clearly identify wetlands as a critical resource with a high priority for protection
12. *State the goal* of the plan as an increase in wetlands
13. Clarify and strengthen the policies and programs for wetland protection and restoration
14. Maintain and strengthen proposals for a corridor wide biking and hiking trail
15. *Clearly identify the significance of open space and undeveloped* land as a critical resource worth protecting
16. Increase commitment to the protecting of remaining open space in the corridor
17. Note environmental problems associated with commercial navigation
18. *Clarify and strengthen the commitment to assessing and addressing the* environmental problems associated with commercial navigation

19. Recognize the deteriorated and fragile nature of the river corridor

20. Clarify and strengthen the proposed detailed resources management plan

21. Clarify and strengthen the role of the Pollution Control Agency in implementation

22. Maintain, clarify, and strengthen the proposed policies and actions on air and water quality in the corridor

23. Strengthen the water quality vision to include a no degradation policy

24. Seek "Outstanding Resource Value Water" status and consistent usage evaluation for the corridor

25. Add a pollution prevention specialist to the MNRRA Park Service staff

26. Strengthen protection for threatened and endangered species

27. Strengthen protection for cultural resources

28. Include users and user groups in the proposed visitor use manages task force

29. Strengthen the encouragement of non-motorized passive recreational use of the corridor

30. Place a high priority on programs and approaches to assuring visitor safety and making the river a friendly place to visit

31. Strengthen the role of citizens and citizen groups in the process to develop greater coordination and consolidation of permits.

32. Maintain a strong role for the Park Service in reviewing federal permits and funding proposals within the corridor

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COMMENTS ON THE DRAFT COMPREHENSIVE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT
FOR THE MISSISSIPPI NATIONAL RIVER AND RECREATION AREA
SUBMITTED BY FRIENDS OF THE MISSISSIPPI RIVER AND THE SIERRA CLUB
NORTH STAR CHAPTER
OCTOBER 8, 1993

GENERAL COMMENTS

1. Increase the plan's natural, cultural, and recreational resource emphasis.

While the proposed plan contains many excellent visions, policies and programs, it needs a more visionary and definitive emphasis on the river's recreational and natural resource potential. Congress did not name the area a "National Working River and Recreation Area" but chose to emphasize the recreational potential of the river corridor. This is also the emphasis which the public wishes for the area.

1 The economic resources offered by the river are also important, but in the long run, the economic value of the river for the Twin Cities metropolitan area will be most protected and sustained by a plan which emphasizes natural and cultural resource enhancement and preservation, and which takes most advantage of the river's recreational and tourism potential. As "quality of life" issues become more and more important in economic location decisions, the presence of a world class natural, cultural, and recreational resource running through the heart of the metro area will greatly promote the economic health of the region. For this reason, it is critical that the plan contain a clear emphasis on the protection and promotion of these resources, while at the same time providing sufficient protection for existing economic resources as required by statute.

In general, alternative B provides a greater level of environmental protection and provides the appropriate direction for the plan, through its emphasis on such issues as natural resource enhancement, increased open space, more rigorous riverfront protection policies, and an emphasis on passive visitor use. While we support this emphasis, we believe that alternative B is too sketchily developed to support as a whole. Therefore, we will include those portions of alternative B which are preferable as they relate to specific topics discussed.

2 2. Focus the plan on promoting sustainable development in the corridor, rather than on balancing competing interests.

A focus on sustainable development recognizes that both environmental quality and economic development are important to the long run future of the corridor. If the plan and its implementation are caught in a constant process of balancing resource demands and claims, then the

1. While the term "working river" is not in the legislation and has no specific legal meaning, it is a commonly used expression for a concept of management and use that was adopted by the commission as one element for the plan. The plan lists policies that are designed to preserve and enhance the full range of resources identified in the legislation. A corridor-long trail, improved river access, and two major interpretive facilities are examples of enhancements pertaining to recreation and tourism.

2. While there were about six references to sustainable development in the draft plan, this idea was added in several other places. This should clarify that the intent is to promote sustainable development in harmony with the existing natural, cultural, and economic resources in the corridor.

FRIENDS OF THE MISSISSIPPI RIVER/SIERRA CLUB COMMENTS

participants will not be working creatively enough to find policies and programs that do not require the sacrifice of environmental quality or of economic development.

The term balance implies a conflict while the concept of sustainability implies a common purpose and vision. No doubt some conflicts will arise as the plan is implemented and for the short run competing claims will have to be balanced. However, the overarching vision should lead participants to step back from short term conflicts as much as possible and seek long term strategies and solutions which promote sustainability. Environmentalists should be pressed to find ways of protecting key resources for sustainability in ways that do not unnecessarily hamper economic development. Economic development advocates need to pursue strategies that encourage growth in directions and sectors that are environmentally friendly and sustainable.

3 The merits of sustainable development as a broad framework for assessing environmental and economic strategies have been recognized and are now being tested at the international, national, and state level. Governor Carlson's initiative in this direction is seeking to clarify what a sustainable development approach might involve at the state level. MNRRA provides an exciting opportunity to apply this concept to a region marked by both great environmental significance and economic activity. As a paradigm and vision for the management of the area, it is clearly superior to the concept of balance. We recommend that the references to balancing resource claims be eliminated or rewritten to reflect a sustainable development approach.

3. Clarify implementation approaches.

4 At many points in the document, it is asserted that resources will be protected, enhanced, restored, etc. However, it is often not clear how these protections are to be implemented and by whom. Nor is it clear whether they are to be protected and enhanced at any greater level than prior to the plan or at any greater level than the same resources outside the corridor. This lack of clarity (for example with respect to the question of whether or not new legislation will be sought) leads to confusion and disagreement.

If corridor resources are to be given an extra level of protection, it must be made clear how this is to be done. Such explanations should include commitment to one or more of the following:

1. NPS staff or financial resources: to coordinate, educate, review, research, provide technical assistance, etc.;
2. Increased effort from some state, regional, or local government unit;
3. NPS funding proposals for grants and cooperative agreements;
4. Changes in state or federal legislation;
5. Rule or policy changes at the state or federal level.

Instances where this vagueness is particularly troubling will be indicated throughout the comments.

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3. Additional text on sustainable development was added but "balance" was retained.

4. Some additional detail on roles was added, but this is a comprehensive policy plan, not a detailed implementation plan.

FRIENDS OF THE MISSISSIPPI RIVER/SIERRA CLUB COMMENTS

4. Clarify and strengthen citizen involvement in implementation.

5 The plan identifies a number of specific implementation steps. These include a general reference to coordination with other groups on page three, the resources management plan discussed on page 39, the task force on visitor use on page 51, and the permit "streamlining" process on page 80. The plan should make clear that citizen and environmental groups will be included in these advisory groups, and in all other implementation activities, to assure that all viewpoints are represented. The Park Service and Commission should commit in the ~~plan to special efforts to solicit and encourage the participation of~~ the diverse ethnic and economic communities represented in the corridor. This commitment to including and representing the interests of all of the corridor's citizens must be strengthened. Otherwise, implementation is likely to be dominated by those with sufficient financial and other resources to be present at all times and influence outcomes.

The reference on page three to the "private sector" must be expanded to specifically note that citizens, community groups, and environmental groups are partners in the implementation process and will be sought out for their input.

5. Remove the multiple "where practical" references.

6 The many references to actions "where practical" throughout the document weaken its vision and impact. The qualification at the bottom of page 17 stating that practicality and feasibility would be a part of all policies and actions is sufficient. All other "where practicals" should be deleted.

6. Clarify the ranking of critical resource protection needs.

7 On page 18, assumption #2 says that protection needs will be ranked and the most significant resources identified. While this ranking may be implied in some of the conclusions of the plan, it is not clearly stated anywhere. There seems to be an emphasis on visual resources ~~and appearance rather than on actual natural resources such as water~~ quality protection, habitat protection, open space, etc. (e.g., page 19, 23.) But even with respect to visual resources, the protection seems qualified, with the "protected and restored where practical" language on page 18. Location policies (page 24) give special emphasis to the riverfront area. More attention needs to be given to what happens in the rest of the corridor. As noted in more detail below, wetlands and undeveloped open space are also critical resources.

LOCAL PLANS, MNRRA PLAN, AND PRIVATE OWNERS

7. Maintain a strong comprehensive plan.

A number of persons commented in the public hearings that the draft plan was overstepping its bounds in requiring local plan development and implementation to be consistent with the MNRRA plan, and that

5. The plan was revised to state that public participation would be an important part of ongoing area management, including appropriate involvement on task forces and committees.

6. Deleting the "where practical" statements was not supported by the commission.

7. The subject statement was not critical to understanding the plan, and it added little to the overall concept and so it was removed from the text.

FRIENDS OF THE MISSISSIPPI RIVER/SIERRA CLUB COMMENTS

"local control" should be the primary vision. This position is contrary to the legislation (PL 100-696) which gives the Park Service definite responsibilities in corridor administration, and is not in the best interests of developing an effective and coordinated resource protection and enhancement program in the corridor.

The Statute clearly implies that the MNRRA plan may and most likely will go beyond or differ from existing local, regional, state or federal plans. Section 703 (i) states that the MNRRA plan shall "endeavor to use" local plans and "where consistent" with the goals of the Act shall coordinate those plans to present a unified comprehensive plan for the area. Presumably if they are not consistent, they should not be used. Section 705 (d) (1) gives the Secretary the authority to "review all relevant local plans, laws, and ordinances" for consistency with the MNRRA plan. Further, this section also authorizes the Secretary to determine the adequacy of enforcement of these plans, laws, and ordinances, including building permits and zoning variances. The statute goes on to describe procedures for the Secretary to follow when local plans and the actions of local governments are not consistent with the purposes of the statute.

8 Thus, while local units of government continue to be the principal implementers of the plans and ordinances, their activities must be reviewed by the Park Service for consistency with the overall MNRRA Plan and statute. Therefore, we strongly support the plan implementation requirement on page 74 that local plans and ordinanc must be consistent with the MNRRA Corridor plan. We believe that a ~~major motivation behind Congressional intent in creating MNRRA and~~ the principal purpose of the statute is to bring greater consistency and levels of protection to the resources of the corridor.

8. State Legislation unnecessary.

9 The state legislation referenced on page 24 to require local plans and ordinances to conform with the MNRRA Plan is not necessary and could lead to a significant delay in implementing the plan. Federal law requires that local plans be consistent with the MNRRA plan and this is sufficient authority. The Minnesota Legislature does not have ~~the authority to override federal action. There is sufficient grounds~~ in the statute to require the updating of local plans and ordinances. This reference to state legislation should be deleted. It simply provides another opportunity for delaying, blocking and/or weakening the plan.

9. Clarify roles, responsibilities, and planning content.

10 The last assumption on page 18 prohibiting the weakening of any local plans is excellent and consistent with the goals of the Act. An identification of where the plan goes beyond existing local policies would be useful. While the MNRRA threat to local planning seems to be ~~a major source of debate for some~~, we believe that the plan goes beyond local plans and policies in relatively few instances. It should do so in more areas as will be indicated in our comments.

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8. The MNRRA plan supports local plan consistency but emphasizes an incentives approach.

9. The MNRRA act does not mandate consistency by local plans, but rather lays out a process for evaluating corridor plans and addressing inconsistent activities. The revised MNRRA plan emphasizes an incentives approach rather than an enforcement approach to plan consistency. The review process for local plans, ordinances, and actions are described in the final plan. The goal is to use existing review processes in a coordinated way, with the agencies reviewing projects concurrently. The reference to state legislation to mandate conformance was deleted from the plan.

10. The MNRRA plan does not go beyond local plans but takes selected elements from several of them. An analysis of how the MNRRA plan compares with the existing corridor plans would be completed during the early phases of plan implementation.

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11 The last sentence in the last full paragraph on page 19 promises the establishment of rehabilitation programs, but no responsible parties are identified, and no particular authority or funding sources are *suggested. These responsibilities must be clearly assigned and time* lines established. This vagueness is repeated throughout the document in the use of passive voice rather than clearly identifying key responsibilities.

12 What does the statement on page 20 that "Nothing in this plan would deprive corridor landowners of all use and enjoyment of their land" mean? Some uses and some ways of enjoying the land will be restricted and prohibited by the plan and subsequent local planning and zoning changes: such as inappropriate development in the riverfront area. This sentence should be clarified or deleted.

13 *Policy (1)* on page 23 states that local governments would acquire the most significant scenic, cultural, or natural resources. How would this work and to what would it apply? Is there a listing somewhere of the resources envisioned for local government acquisition? Are these just the resources currently in local plans for acquisition? Are these identified anywhere in the plan? Which resources are envisioned. As currently stated, this policy is extremely vague. Does it just refer to the matching grants program or to more activities?

14 Policy (3) on page 23 states that protective site development and resource protection policies "could" be incorporated into existing local zoning ordinances: this should be changed to "would" be incorporated. Also it should be made clear that the Park Service will develop these policies.

RIVERFRONT AREA AND FLOODPLAIN

10. Strengthen protection and enhancement of the riverfront area

The land use protection policies articulated in Alternative B (pages 94-95) should generally be incorporated into the final plan to provide greater protection for the riverfront area. Inconsistent uses

15 in the riverfront area should be phased out, and funds provided for purchase of such uses. (Page 95) There should be a more aggressive land acquisition program to protect resources. Shoreline restoration should be stressed to provide a continuous, wide, and heavily vegetated area along the river wherever possible.

16 The goal of the plan should not be to preserve existing conditions in *the floodplain as indicated on page 20. The goal should be to remove* inappropriate uses from the floodplain. More aggressive measures should be identified to impact floodplain use.

17 The location policies exemption for areas behind levees stated on page 24 should be removed.

The acceptable uses and those that would be "normally" discouraged *listed on pages 24-25 provide sufficient flexibility to allow a wide*

11. This is beyond the scope of the MNRRA plan, which is a comprehensive policy plan and not a detailed implementation action plan.

12. See response to comment B-7-24.

13. This is beyond the scope of the MNRRA comprehensive plan but would be assessed in follow-up work.

14. In response to public comment and a review of the legislative intent for the Mississippi National River and Recreation Area, the commission and the National Park Service are emphasizing an incentives approach rather than mandatory requirements.

15. The emphasis of the plan is on careful management of new development in the corridor, particularly along the riverfront. Phasing out existing inconsistent uses in the riverfront is supported by the plan, with local communities taking the lead. Although funding for this type of activity is not directly mentioned in the section of the legislation pertaining to grants, grant funds could be available for this purpose.

16. See response to comment G-36-4.

17. The levee exemption was removed. See response to comment G-8-2.

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variety of uses which enhance the riverfront area. We oppose any further weakening of these requirements.

18 Who will develop incentives to encourage relocation by those facilities not needing the riverfront identified on page 26? The NPS should be specifically identified as having this responsibility.

19 How will the effectiveness of development regulation enforcement in the corridor be increased as noted on page 28? This should be made clear. Whose role is this and how will the additional resources for enforcement be found?

WETLANDS

20 11. Clearly identify wetlands as a critically important resource with a high priority for protection.

In the discussion of wetlands on page 122, the plan identifies 21,525 acres of wetlands in the corridor, or approximately forty per cent of the area. While the importance of wetlands for threatened and endangered species is noted, there needs to be a greater discussion of the significance of wetlands for wildlife habitat in general and for biological diversity, and of the important role that wetlands play for water quality by recycling nutrients, filtering pollutants, and reducing siltation. The role of wetlands in reducing erosion, controlling floods, and recharging groundwater should also be noted As the corridor becomes more developed and open space is lost and covered with relatively impermeable surfaces (streets, houses, parking lots, etc.), the burden on wetlands to provide these functions will grow. This needs to be emphasized in the plan.

The section also notes the increasing numbers of wetlands lost in the corridor by draining and filling and by less obvious means such as dewatering by draining groundwater which is connected to a wetland. As noted on page 9 of the plan, "direct and indirect loss of wetlands has also been due to groundwater depletion and diversion of water from wetland areas." This conjunction of increasing importance and decreasing numbers deserves greater focus in the plan.

21 Currently, references to wetland protection and restoration are scattered throughout the document so that their significance and the strategy and programs to be proposed for their protection are diluted and not given sufficient priority. Given the critical significance of these resources for the environmental health of the corridor, there should be a wetlands section. (Note: the index to wetland references appears to go awry at some point late in the listing. This should be checked.)

22 In addition, in many instances in the document wetlands are listed as significant "visual" resources, rather than being recognized for their great water quality and habitat significance. While the visual quality of wetlands is important, their value for other factors is equally or more important.

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18. All partners would be encouraged to develop incentives.

19. This is beyond the scope of the MNRRA comprehensive plan.

20. See response to comment G-36-4. Wetlands are identified as a high priority for protection in the final plan.

21. See response to comment G-36-4. A wetlands section was added.

22. This concept is included in the new section on floodplains and wetlands.

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23 12. State the Goal of the Plan as an increase in wetlands in the corridor.

The level of protection and restoration envisioned for wetlands in the proposed alternative and the strategy and plan for achieving this are not clear. However it is clear that the proposed alternative does envision some continuing loss of wetlands.

On page 172, the impacts of alternative B are discussed."All wetlands in the corridor would be more likely to be preserved.... Areas that were historical wetlands would be restored to the greatest extent possible, resulting in the greatest level of wetland area of all the alternatives." And on page 174 it is stated that under alternative B increased protection of all wetlands would diminish development opportunities somewhat.

The additional loss of wetlands in the corridor is unacceptable. The basic policy for the proposed plan should be should be taken from alternative B which states that "alteration of ...wetlands...would be prohibited." Coupled with aggressive wetland restoration programs, this would lead to an increase in wetlands in the corridor. This should be the vision.

24 13. Clarify and Strengthen the policies and programs proposed for wetland protection and restoration.

Wetland protection strategies are discussed in the sections on location policies (page 26, #9) and site development policies (page 29, #12). It appears that the location policies do not provide any additional protection for wetlands but rely principally on policies currently in state and federal laws and local plans, which for the most part have been in effect while the significant loss of wetlands has occurred. Further, it is not clear to whom these points are addressed and with what authority.

The required local plan amendments and subsequent zoning changes appear to be focused on the 300 foot riverfront area, with existing plans remaining in effect in the rest of the corridor. If this is not the case, it should be made clear that local governments are to revise their plans for the entire corridor area, especially with respect to enhanced protection for wetlands. We strongly support the "Site Development Details" (page 209) that appear to mandate "no disturbance" requirements for wetlands incorporated into local zoning ordinances.

On page 80 it is indicated that wetlands were required to be addressed in the critical areas planning process. Does the MNRRA planning process require the same attention to wetlands?

Currently , the strategy for protecting wetlands appears to focus on:
- cooperative efforts with other landowners and agencies and interpretive programs and recreational activities which would further appreciation of wetlands.(page 161)
- increased enforcement of federal, state, and local wetland protection and the restoration of degraded wetlands. How this

23. See response to comment G-36-4.

24. See response to comment G-36-4.

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increased enforcement and restoration are to occur is not indicated.(#21 on page 41)
- site development guidelines discussed above (page 209)
- potential use of open space acquisition grants to acquire critical wetlands.(page 33-34)

25 Critical wetland acquisition is an appropriate use for open space acquisition grants, and we categorically reject the comment submitted by some that these grants should be limited to acquisitions for the completion of the existing, planned recreation system. The statute in Sec. 706 (a) clearly allows great flexibility in the uses of the matching grants, requiring only acquisition and development in a "manner consistent with the purposes of this subtitle." The purposes of the subtitle are the protection of the significant resources of the corridor, to be identified and protected by the comprehensive plan. It would be counter to the spirit of the Act to arbitrarily limit these grants to completing existing recreational plans if more critical resource protection needs are identified by the plan.

To these protection strategies, alternative B adds greater public land acquisition and increased staff and funding to accommodate a more ambitious natural resource management program, and the proposed alternative should include these commitments. We do not believe that greater Park Service ownership is necessary, but public ownership or the purchase of conservation easements by local units of government should be aggressively used.

In addition, recognizing the fact that current laws do not sufficiently protect all wetlands in the corridor, the plan should include commitment to a followup study as part of the resources management plan, to determine what changes in state law are necessary to assure protection of all wetlands in the corridor. Also included in this study should be an inventory of historic wetlands and a prioritizing of those which should be selected for restoration projects.

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TRAILS

14. Maintain and strengthen the plan's proposals for a corridor wide hiking and biking trail.

As noted on page 30, a continuous trail is one of the "important visions" of the plan. To achieve this vision, more aggressive action needs to be identified in the plan.

26 Local trail plans and implementation plans should be required to link up a coordinated trail for the entire system. The plan should identify a trail system and require conformity as is done with the river shoreline planning effort. Recognizing the benefits to the entire community of a continuous trail, local governments should not be allowed to opt out of the trail system and regional, state, and/or federal funding should be made available for a portion of the costs.

Language should taken from alternative B (page 95) with respect to trails, and inserted onto page 30-31. The following should be

25. The grants would be limited only by the authorizing legislation, criteria included in the MNRRA plan, and appropriations provided by Congress. They may be used to protect sensitive resources, such as wetlands.

26. See response to comment O-3-43.

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included in the proposed alternative: pedestrian and bicycle paths would be emphasized to a greater degree; abandoned railroad rights of way would be aggressively acquired for trail development; easements would be required in new developments for future trail corridors.

OPEN SPACE

27 15. Clearly identify the significance of open space and undeveloped land as a critical resource worth protecting.

The environmental significance of open space for the recreation area is not sufficiently explained or emphasized. By lumping the issues of open space, trails, and riverfront land together in one section, the significance of open space for habitat, water quality, air quality, noise pollution, recreation, etc. is undervalued. But even in this section there is little attempt to explain and advocate the value of open space and undeveloped land. When the value of open space is discussed it is typically in terms of significance for visual resources and related to riverfront trails or developed parkland. Contrast the first paragraph on page 30 with that relating to the

28 significance of barge traffic on page 34. When the value of open space is discussed, there is typically too much emphasis on the "visual character" of the corridor and not enough on the other values represented by open space.(e.g., page 153)

The low priority given to open space off the riverfront area is reflected in two specific points in the plan that should be changed.

29 On page 20 it is indicated that there could be "intensive development away from the shoreline." Such development should not be encouraged within the corridor. This sentence reflects the clear delineation in the plan between the 300 foot riverfront area and the rest of the corridor. This is inappropriate, and greater attention needs to be paid to what happens off the riverbank. This impacts recreational use, wildlife habitat, and water quality through the increase in development and polluted runoff.

30 On page 18, why is it assumed that much of the land of the corridor will be developed in the next 10-15 years? The preservation of open space and wildlife habitat should be a key goal of the plan and should not be assumed away at the start. This assumption should be changed to reflect the importance of controlling growth and preserving open space.

The MNRRA corridor is blessed with large amounts of remaining open and undeveloped land. The landcover data reported on page 114 indicates that the recreation area is still 28 per cent forest, 15 per cent agricultural use, 11 per cent sparse tree and shrub. Only 28 per cent is developed land. On page 85 it is indicated that approximately 19,000 acres are undeveloped currently, with over 9,000 zoned for future development. These numbers apparently come from the tables on pages 152-3. Other information on those pages indicate that there are 4,000 acres of undeveloped industrially zoned land and over 15,000 acres of residentially zoned land, of which "much" is

27. A statement was added to clearly identify open space as a critical resource worth protecting.

28. This was a misunderstanding of the draft plan, which supports the many benefits of open space. However, to further clarify this, statements were added to the final plan to stress other important aspects of open space, such as wildlife habitat.

29. The corridor includes portions of two major downtowns, many cities and towns, and much existing development. The plan does not encourage intensive development, except to cluster activities and shift uses back from the shoreline, but it does recognize that it is a fact of life in a large, growing metropolitan area. Without massive purchase of land for open space, or major downzoning for less intensive uses, this effect would continue. Achieving nonintensive development throughout the corridor is not feasible. The plan hopes to direct use to less sensitive areas and preserve as much open space as feasible in this environment.

30. The plan does not encourage extensive development in the corridor, but without major funding to purchase open space or an unlikely moratorium on development in the corridor, this assumption is reasonable based on current trends. Preservation of open space and wildlife habitat is still a key goal that would be pursued while development continues.

identified as currently undeveloped. So it would seem that the 9,00 acre figure is probably a low estimate.

31 There needs to be much more emphasis in the plan on the value of open space in the corridor. The significance of this open space goes way beyond visual aspects and greatly shapes the nature of the river. A separate section of the proposed plan should be developed to address the issue of open space and its protection.

16. Increase the commitment to the protection of remaining open space in the corridor.

32 Given the low priority of open space off the riverfront area, it is not surprising that the proposed policies and actions on pages 33 and 34 propose little in terms of open space protection. Other than the acquisition grants (for which funding is yet to be acquired and for which there will be a great deal of competition) the plan leaves the protection of open space off the riverfront to existing local zoning ordinances and other existing protections. This is unacceptable.

The goal and implementation strategy stated in Alternative B (page 95) should included in the plan as a minimum starting strategy. As stated on page 95: "The amount of undeveloped land in the corridor is about 19,000 acres. Of that, over 9,000 acres are already zoned for future development, and it is likely that pressures will grow to rezone and develop additional lands as the Twin Cities region grows. If this alternative is selected, that National Park Service would work with state and local agencies to identify and cooperatively assure maximum open space opportunities for the corridor."

In addition, guidelines for aggressive open space protection should be developed by the Park Service and required to be included in local planning and zoning revisions. The Park Service should work closely with the Metropolitan Council, the DNR, and others on this issue to assure that continuing urban sprawl does not destroy the protected resources in the MNRRA corridor. In this connection, the Park Service and the Commission should commit to a careful analysis of airport relocation proposals and their potential effect on development and loss of open space in and adjacent to the corridor.

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COMMERCIAL NAVIGATION

17. Note environmental problems associated with commercial navigation.

The section beginning on page 34, discussing the role of commercial transportation in the corridor, should include a description of the environmental problems created by barge traffic. These are described and discussed elsewhere in the report, but should be included together in this section. Barge traffic and associated dredging, dredge material disposal, and fleeting do have environmental impacts which must be considered as barge use of the river continues and possibly expands. In addition, the potential for an increase in use

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31. In the final plan, the many values of open space are emphasized.

32. It is true that the riverfront is a priority, but other locations for open space are envisioned and illustrated on the Open Space Opportunities map.

33. These impacts are recognized and would be considered in the surface water use management plan and future management actions for barge transportation and fleeting, as specified in the MNRRA plan.

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conflict should be noted as recreational uses of the corridor, particularly non-motorized uses, increase.

18. Clarify and strengthen the commitment to assessing and addressing the environmental problems associated with commercial navigation.

34 The language of alternative B regarding barge operations should be incorporated into the proposed alternative. This would include a freeze on new fleeting sites until research had documented that new sites are needed and that there would be no adverse effect on resources. Comprehensive planning, no wake zones, and other surface use regulations should be studied and implemented as appropriate to protect the environment and other corridor users. The Park Service should take the lead in this analysis.

35 In this section, more recognition should be given to the potential negative impacts of dredging and placement of dredge material in resuspending toxic materials in the river. The MPCA reports that often the permits for placement of dredge materials are violated in terms of suspended solids returning to the river. Language should be inserted in the plan that would indicate special care necessary when dredging to avoid contaminated "hot spots." The Park Service and the Commission should work with the MPCA and the Corp of Engineers to assure that dredging and dredge material placement are protective of the environment.

36 In policy #1 on page 37 it should be made clear that the Park Service and the Commission will develop the monitoring programs to evaluate potential needs and impacts.

37 On page 169 it is noted that towboats and barge traffic cause the resuspension of sediments in the river, which may be contaminated with PCBs and heavy metals. This information should be included in the commercial navigation section and a policy should be developed to assure that this problem will be further assessed in the resources management plan, as noted in policy #25 on page 41.

ENVIRONMENTAL QUALITY IN THE CORRIDOR

19. Recognize the deteriorated and fragile nature of the river corridor

38 The assertion on page iii that the river has been preserved "in good condition" is overly positive about the environmental status of the river corridor. The statement sets a tone for the plan that minimizes the environmental degradation that has already occurred and could lead to the conclusion that not much more needs to be done. This paragraph should be changed to present a more complete view of the environmental status of the river. This would include the loss of wetlands and other critical habitat and the polluted state of the river which does not meet any of the designated uses under the Clean Water Act. The river is currently not swimmable nor fishable and has been used as a dumping ground, first for sewage, then for toxic chemicals and polluted runoff.

34. Based on a review of current conditions and public input, the commission does not support a freeze on barge fleeting sites. A surface water use management plan is proposed, but decisions would continue to be made by local governments and the Corps of Engineers.

35. This was added to the Final Environmental Impact Statement.

36. The Corps of Engineers would continue to have the lead in commercial navigation management. The National Park Service would be involved in the surface water use management plan and coordinate with the Corps of Engineers to establish this monitoring program.

37. This concern is noted and potential problems are better reflected in the commercial navigation and pollution control sections of the final plan.

38. The text was revised to reflect public input on the condition of the river and the subject phrase was removed.

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The Environmental Impact analysis of the effects of the proposed alternative (pages 160-161) is also overly optimistic and does not take into account the fragile and threatened nature of the river environment. The statement that increased recreational boating, especially in side channels and backwaters, will impact fish and wildlife resources in only a minor way is overly optimistic and needs to be justified or changed. A similarly overly optimistic view is offered with respect to the spread of exotic species and the potential for increased threats to endangered and threatened species. Greater care and attention must be included in the plan to assure these optimistic outcomes.

20. Clarify and strengthen the resource management plan

39 A target date for the completion of the more detailed resource management plan discussed on page 39 should be indicated. Also, more detail should be provided regarding who will participate in the development of the plan and the process to be followed. Specifically, the role of the Commission, neighborhood, citizen and environmental groups should be identified. The Resource Management Plan should specifically include a consideration of the merits of implementing a "zero toxics" program comparable to that being implemented for the Great Lakes by the International Joint Commission.

40 Related to the resource management plan, and in its role as monitor and coordinator for environmental quality in the corridor, the NPS should produce a biennial report on the progress being made in achieving the visions, policies, and programs identified in the comprehensive plan. This would include at least an evaluation of progress and/or results for the pollution policies and programs as well as other natural resource management activities, particularly a documentation of any wetlands losses, a reporting of current permitted toxics loadings and actual loadings in the corridor, the status of water and air quality in the corridor, etc.

It is stated on page 34 that "A coordinated effort would be made by all partners to protect and manage sensitive and unusual habitat areas in the corridor." Have all partners in the corridor indicated a

41 willingness to participate in this coordinated effort? Such commitments should be sought by the Park Service and the commission and the results included in the next version of the Plan.

21. Clarify and strengthen the role of the Minnesota Pollution Control Agency in implementation.

42 A section describing the role of the Minnesota pollution control agency in the corridor should be added to the "Partner Roles" section beginning on page 76. This would include their responsibilities in air and water quality, the cleanup of waste sites, spill prevention and response, pollution prevention, permitting and enforcement, point and nonpoint pollution, monitoring, wetlands protection, dredge material disposal, sediment cleanup, etc.

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39. A target date for completion of the resource management plan cannot be specified at this time. It would depend on how long it would take to marshall the necessary staff and financial resources, the scope of the project, data needs, and the ability of the participants to focus on the project. Public participation would be included as appropriate for the Mississippi National River and Recreation Area.

40. A statement was added to the Partner Roles section of the plan stating that periodic progress reports would be prepared.

41. Additional commitment was sought by the National Park Service and the commission during efforts to finalize the plan and would continue to be sought during follow-up activity.

42. This was added to the Partner Roles section.

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AIR AND WATER QUALITY IN THE CORRIDOR

22. Maintain and clarify the proposed policies and actions on air and water quality in the corridor.

We strongly support the visions, policies and programs outlined on pages 40-41. They represent a minimum program for protecting and improving air and water quality in the corridor. The section could be greatly strengthened by identifying the actors responsible for carrying out each of the policies and actions, and by clarifying which activities rely on state legislative or rule changes, which advocate changes in local or regional plans or ordinances, which require increased levels of regulatory activity by existing agencies, and which depend on "softer" strategies such as education, promotion, coordination, information, or research. Many of the proposals would appear to require actions by parties other than the Park Service and the commitment of these organizations (e.g., MPCA, Watershed Management Organizations, Local governments, DOT, DNR, Corp., etc.) is not clear. Where "increased effort" type policies are proposed, there needs to be some identification of where the resources will come from for such efforts; either from Park Service resources, or the resources available to state and local agencies. 43

The section could also be strengthened through a reorganization that provides more structure to the list of 25 actions, which now appears to be a more or less randomly organized list with some repetition. One possible reorganization is attached to these comments as Attachment 1.

23. Strengthen the Water Quality Vision to include a no degradation policy.

The vision for water quality stated on page 39 should be clarified and expanded. It should be made clear that the vision for a "fishable" river means both that the river water quality is sufficient to support a healthy aquatic life community appropriate for such a river ecosystem and that the fish that are caught in the river can be eaten without any fish consumption advisories. The fishable criteria should be clearly described to include both the presence of a healthy appropriate fish population and the removal of all fish consumption advisories. This would seem to be implied in the fishability criteria, but this goal is discussed on page 172 under the impacts of alternative B. This should be clarified. Further, given the proposed changes in MPCA water quality rules, it is important to recognize that the standard that used to emphasize the existence of sport fish in the river is being expanded to cover a broader range of aquatic animals and plants.

The vision should also be expanded to state that the goal is to have the river be as clean when it leaves the MNRRA corridor as when it enters. This no degradation policy has been proposed by Metropolitan Council staff and its water quality committee and is currently under consideration by the full Council. It should be MNRRA's vision. Otherwise, the corridor will be dumping its pollution problems on downstream areas. 44

43. While it would be desirable to have some of these details in the plan, many need to be worked out with other partners and are better placed in follow-up implementation action plans. The intent of the comprehensive management plan is to provide a vision for the future and lay out a framework and general policy direction. Many of the details of how this direction would be achieved are best left for follow-up administration.

44. This concept was added to a water quality vision in the final plan.

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45 24. Seek "Outstanding Resource Value Water" status and consistent usage evaluation for the corridor.

A proposed Policy and Action should be added to seek changes in MPCA rules to lead to a greater level of protection for the river within the recreation area. MPCA rules include a classification of "Outstanding Resource Value Waters" which provides for greater protection for any water body identified as such. One of the criteria which qualifies a water body for such classification is "a federal or state scenic or recreational designation." There are two classes, "prohibited discharge" waters, where new or expanded discharges are absolutely prohibited, and "restricted discharge" waters where new or expanded discharges are prohibited unless there is not a feasible and prudent alternative to the discharge.

A proposed policy and action should be added stating that the Park Service and Commission will seek limited discharge outstanding resource value water designation for the MNRRA corridor.

Further, the NPS and Commission should commit to seeking consistent designation for the River corridor under MPCA rules. Currently under these rules the river is divided into three separate sections, each with a somewhat different designation. A portion of the corridor is currently not protected as drinking water or swimmable water. This should be changed to afford the entire river corridor with the same high level of water quality protection.

For details and rule references on these proposals see Attachment 2, points 1 and 5.

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25. Add a pollution prevention specialist to the National Park Service MNRRA staff.

Improvements in water quality will be critically important to encouraging greater appreciation and enjoyment of the river corridor.

46 A staff member at the NPS should be dedicated to promoting and publicizing programs relating to pollution prevention as well as building partnerships between industry, community, and government to promote sustainable industrial practices.

It is widely recognized that preventing pollution at the source through changes in product, process, raw materials, etc. is the most effective way of protecting the environment. Often such actions can produce results which exceed requirements in cost effective ways. Minnesota is a leader in the nation in developing partnerships to encourage pollution prevention. Programs exist at the MPCA, the Metropolitan Waste Control Commission, and the Office of Waste Management to promote and further such approaches. In addition, the state has a nationally recognized pollution prevention technical assistance program based at the University of Minnesota. A Park Service staffer would be able to draw on these resources to develop an aggressive partnership campaign for pollution prevention in the corridor.

45. See response to comment O-3-14.

46. See response to comment O-3-8.

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This specialist would also monitor and promote pollution prevention as a solution to the problem of polluted runoff. While expensive "end of the storm drain" approaches may be necessary at some point, the most cost effective ways of reducing polluted runoff will be through changing behavior and accepted practices at the source of the runoff. Some policies aimed at this goal are already listed in the policies and programs section on pages 40-41. Dedicating a staff position to encouraging this activity is important for assuring that such programs are aggressively pursued.

THREATENED AND ENDANGERED SPECIES

26. Strengthen protections for threatened and endangered species.

47 The protection of threatened and endangered species in the corridor should be given a higher priority and more resources than are envisioned in the proposed option. This goal overlaps significantly with the points discussed above regarding open space and wetlands. We do not believe it is necessary for the Park Service to take the sole lead in this area, as indicated in Alternative B (page 97), but the priority indicated in this option should be adopted through cooperative actions with the DNR, Fish and Wildlife Service, Met Council, local governments, and citizen groups.

The following language from the analysis of environmental impacts of alternative B (page 172) should be incorporated into the final plan: "The habitat for fish and wildlife would be analyzed and monitored...to determine the quality of habitat in the corridor. Once habitat quality is determined, more intensive programs would be developed to ensure maintenance of habitat at the highest attainable level. Threatened and endangered species would be more extensively inventoried and closely monitored in cooperation with the Department of Natural Resource and the Fish and Wildlife Service to determine the extent of critical habitat in the corridor. Access to critical habitat areas would be limited, which would preserve the areas for wildlife habitat."

CULTURAL RESOURCES MANAGEMENT

27. Strengthen the protection of cultural resources in the corridor.

We strongly support the preservation of open space in order to protect significant archaeological resources as noted in policy #2 on page 42. However, as noted in previous comments about open space protection, this policy should be stronger and should place a greater priority on open space protection.

48 The inventory of sites of importance to Native Americans should be conducted as quickly as possible to prevent loss of such sites to development. This inventory should be done in close cooperation with the Native American community.

47. The plan was revised to clarify the need for endangered species protection, recognizing that implementation would depend primarily on the commitment of other agencies and the private sector. A separate section was included under resources management to emphasize endangered species protection.

48. Opportunities to provide input were extended to the Native American community throughout the MNRRA planning process. A detailed field survey of Native American sites is beyond the scope of this document. A survey of Native American sites would be pursued in the future. The inventory is important for cultural resource management purposes. Field surveys outside NPS-owned land, however, would be completed by others. The resource management plan would provide more detail on this management activity. The final plan emphasizes the need to complete these surveys.

FRIENDS OF THE MISSISSIPPI RIVER/SIERRA CLUB COMMENTS

VISITOR USE AND INTERPRETATION

28. Include users and user groups in proposed visitor use management task force.

49 The ad hoc task force proposed on page 51 should include representatives of user groups, environmental groups, and neighborhood and community groups. Special efforts should be made to solicit input from minority and low income communities. Sub-groups should be formed for the various distinct stretches of the river corridor.

50 29. Strengthen the policies and programs designed to encourage non-motorized passive recreational use of the river corridor.

The emphasis described in Alternative B on pages 97-98 should be incorporated into the final plan. The emphasis should be on passive recreational activities and minimal impact on corridor resources. More liberal use of no wake zones should be encouraged to provide additional quiet zones in the corridor and protect shorelines. Conflicts between uses should be settled in favor of those less damaging to the environment. Recreational motorboating and marina expansion should be controlled. Some sensitive areas should have restricted access. Parkland site development should emphasize natural conditions. Trail access should be provided in all new developments.

Policy #1 on page 51 should be changed to state that new major private developments and all public facilities should be required to provide public trails and river access, not just encouraged to do so. Local plans and zoning ordinances should be amended to incorporate this requirement.

In policy #2, it should be clarified that the Park Service would take the lead in monitoring the impact of marinas and doing the analysis necessary to determine when or if there should be a change in the configuration of marinas on the river. In this analysis, strong consideration should be given to the supply and accessibility of canoe launch sites in those areas of the river most amenable to canoe use. As noted above, there should be a moratorium on marina and boat ramp development until a visitor use management plan is developed.

Policy # 5 should be strengthened to require rather than encourage the water surface-use regulations described in the policy. The visitor use management plan discussed above, developed in cooperation with local governments and user groups, should include such regulations to be required for local plans and ordinances.

51 30. Place a high priority on programs to assure visitor safety and making the river a friendly place to visit.

Assuring visitor safety is a critical component of making the river corridor area more user friendly and inviting. The Park Service should make a special effort in this area including holding public meetings in areas particularly affected by issues related to visitor safety. Input should be sought and utilized in the development of

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49. The final plan emphasizes that opportunities for public input would be provided in follow-up work.

50. The proposed plan encourages a broad spectrum of visitor activities, with an intent to steer conflicting uses to different areas where they can be accommodated with minimal impacts on the environment and other users. Some additional emphasis was added for nonmotorized uses. Additional detail on visitor use management would be developed in follow-up planning.

51. The text was revised to say that visitor safety would be a high priority.

FRIENDS OF THE MISSISSIPPI RIVER/SIERRA CLUB COMMENTS

aggressive policies to increase safety in these areas and to increase the perception of the river as a friendly place to visit.

THE COORDINATION AND CONSOLIDATION OF PERMITS

31. Strengthen the role of citizens and environmental groups in the process to develop greater coordination and consolidation of permits.

The statute requires that the plan include "A program for the coordination and consolidation, to the extent feasible, of permits that may be required by Federal, state, and local agencies having jurisdiction over land and waters within the Area."

We believe that the discussion of regulatory "streamlining" on pages 81-83 satisfies this requirement by specifying a concrete process for achieving the coordination and consolidation of permitting activities. Specific proposals regarding the consolidation or coordination of specific permit programs are beyond the scope of this general management plan, and the identification of a process for doing this is at a level of detail consistent with other areas of the plan, e.g., the proposal for a more detailed resource management plan to achieve resource protection goals (page 39). While we believe that the section satisfies the legislative requirement, we feel that the section could be strengthened by the following changes.

52 1. We suggest that the section on page 81 be titled "A Program for the Coordination and Consolidation of Permitting" to make clear that this section specifically addresses this requirement. We also believe that the use of the term "streamline" should be replaced by "coordination and consolidation" throughout the section to be more consistent with statutory language. We feel that the term "streamline" implies too great a connotation of speed and not enough concern with appropriate review and public input.

53 2. The section as currently written contains nothing relating to the difficulties faced by citizens interested in participating in the permitting process. The complexity of permitting activities related to such issues as wetland protection, land use regulation, water quality, etc. presents significant barriers to constructive participation by citizens. This should be noted as a problem and a point should be added to the bulleted points on pages 81-82 regarding needs to be addressed. Suggested language: "mechanisms to facilitate citizen understanding of and participation in permitting processes."

In this connection, the numbered points on pages 82-83 should be amended as follows. The forum discussed in (2) should be expanded to seek public input and participation in the coordination and consolidation process. The small task force discussed in (3) must include at least one representative of an environmental group. Consolidation and coordination must not become just an "easier" way to get permits. The protection of the environment and the rights of citizens to participate must be protected.

52. This language change was made.

53. This language was added.

FRIENDS OF THE MISSISSIPPI RIVER/SIERRA CLUB COMMENTS

The language in (3) should be changed to specifically recommend tha the Governor appoint such a group. The plan should specify that if the Governor fails to do this by a specific date, the Commission will convene such a group to satisfy the statutory requirement. Language describing the Guide to corridor development mentioned in (4) should specifically include discussion of avenues for citizen involvement in the permitting process. Point (5) should be changed to "staff to assist permittees and citizens with the process."

NATIONAL PARK SERVICE ROLE IN FEDERAL PERMITTING AND PROJECT FUNDING

54 32. Maintain a strong role for the Park Service in reviewing federal permits and funding proposals within the corridor.

The requirement for a program to coordinate and consolidate permitting activities should not be misunderstood to imply that the *Park Service (acting on behalf of the Secretary of the Interior)* is not required by law to bring an additional perspective and level of scrutiny to federal permitting and funding in the MNRRA corridor. Some have argued in previous testimony that having a significant Park Service oversight of activities in the corridor is inconsistent with the provisions regarding coordination and consolidation (the "another layer of bureaucracy" argument). This is an inaccurate reading of the statute, which clearly gives the Park Service specific responsibilities in administering the corridor. The key is to effectively implement these responsibilities in a coordinated and efficient way. Again, the background and legislative history of PL 100-696 clearly demonstrates a Congressional concern for a federal presence in corridor activities.

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Specifically, section 704 (b)(1) requires the Secretary to make a determination on any federal license, permit, or funding activity within the MNRRA corridor regarding the consistency of the action with the MNRRA plan. A specific procedure is spelled out for situations where there is disagreement among federal agencies, including a report to Congress when differences cannot be settled. The intent of the *legislation here is clearly* to give the Park Service oversight responsibilities.

We agree that more discussion could be included in the plan as to how this activity will be carried out, and the timing related to existing permitting and funding timelines. We also agree that, to the greatest extent possible, this review authority should not unnecessarily delay permits or projects. However, to deny Park Service responsibility to review projects for consistency with the plan would be contrary to *the legislation.*

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54. The National Park Service would carry out its federal review responsibilities under the law. While reviews would be expedited to avoid delays, NPS comments would reflect an emphasis on protecting natural, cultural, and economic resources in the corridor as specified in the MNRRA act. Comments would be based on the visions, concepts, and policies articulated in the MNRRA plan as directed by Congress.

ATTACHMENT 1
REORGANIZATION OF PROPOSED POLICIES AND ACTIONS
NATURAL RESOURCE MANAGEMENT: POLLUTION

POINT SOURCE POLICIES AND ACTIONS
1. Ensure strict enforcement of and compliance in meeting existing standards.
2. Provide incentives and increase cooperative ventures with voluntary efforts for exceeding standards.
3. Make efforts to prevent new sources of pollution.
4. Require all marinas to have dumping stations.

NONPOINT SOURCE POLICIES AND ACTIONS
1. update development standards and promote increased stormwater retention in major new construction and redevelopment projects.
2. reduce the use of chemicals for fertilizer and pest control for agriculture and residential areas.
3. Reduce the use of salt on roads.
4. Increase frequency of street sweeping.
5. Increase the use of skimmers on creeks.
6. Encourage alternatives to grass lawns.
7. Support Met Council's interim strategy to control nonpoint source pollution.
8. Ask Watershed Management Orgs to establish ongoing water monitoring programs and develop programs to prevent as part of revised plans.

POLICIES AND ACTIONS ADDRESSING BOTH POINT AND NONPOINT POLLUTION
1. Develop educational programs.
2. Work in selected areas to protect sensitive resources.
3. Support existing programs to prevent, better manage, and decrease the volume of toxic wastes in the corridor.
4. Support additional efforts to prevent the creation of new sources of toxic emissions.
5. Work with MPCA to support and supplement ongoing efforts, especially Minnesota River and phosphorous pollution.

SPILL RESPONSE AND PREVENTION POLICIES AND PROGRAMS
1. Advocate accelerated conversion to double hull barges.
2. Encourage efforts to reduce the potential for spills from rail and truck.
3. Encourage efforts to develop spill prevention and response plans.

AIR QUALITY POLICIES AND PROGRAMS
1. Provide incentives for exceeding standards.
2. Review air quality permits inside and outside the corridor.
3. Support additional efforts that would prevent the creation of new sources of toxic emissions in the corridor.

NOISE POLLUTION POLICIES AND PROGRAMS
1. Evaluate noise standards and sources. Improve standards, education, mitigation, and enforcement if determined inadequate.

OTHER
1. Seek cleanup of corridor lands.
2. Clean up contaminated sites faster by higher priority on superfund.
3. Protect streambanks and water quality from negative impacts of recreation activities.
4. Increase enforcement of federal, state, and local floodplain protection policies.
5. Increase enforcement of wetland protection policies.
6. Restore degraded wetlands.
7. Encourage timely completion of CSO project.
8. Address the issue of contaminated bottom sediments in the resources management plan, particularly in response to potential increases in river traffic.

ATTACHMENT 2

September 29, 1993

Judge Allan Klein
Office of Administrative Hearings
100 Washington Square
Minneapolis, MN 55415

Dear Judge Klein:

The Sierra Club North Star Chapter is pleased to offer the following comments on the proposed revisions to Minn. Rules ch. 7050.

1. **Regarding 7050.0180, Nondegradation for Outstanding Resource Value Waters; Subpart 6, Restricted discharge:**

That part of the Mississippi River included in the Mississippi National River and Recreation Area (MNRRA), roughly the 72 mile stretch through the Twin Cities Metropolitan Area, should be included in the restricted discharge category. Subpart 6 (D) includes any "federal or state designated scenic or recreational river segment" in this category. Subpart 6a lists examples of such waters, but states that such waters are not limited to those on the list. MNRRA fits this category, but is not currently listed. It should be added to the list in 6a.

On November 18, 1988 Public Law 100-696 created MNRRA, recognizing that it represented an outstanding and nationally significant historical, recreational, scenic, cultural, natural, economic, and scientific resource. The law also recognized a national interest in the preservation, protection, and enhancement of the river for the benefit of the people of the United States.

The designation of the MNRRA corridor as an outstanding resource value water is a logical and reasonable response by the State of Minnesota to the passage of this law. The corridor fits the criteria laid out in the current water quality rules and should be included in the list under subpart 6a. While the plan required by statute for the MNRRA corridor is still in draft form, natural resource protection policies in the current version call for a reduction in the volume of toxic materials in the river corridor and cooperative efforts to prevent new sources of toxic emissions to the air and water of the corridor. The "feasible and prudent alternative" test for new sources of pollution would provide an effective means for limiting unnecessary new discharges.

Subpart 8 requires that a public hearing be held prior to the establishment of additional outstanding resource value waters. The Pollution Control Agency should move ahead with such a hearing

immediately to conform the rules to the language of 7050.0180 Subpart 6 (D).

2. Regarding 7050.0185, Subpart 9, Physical Alteration of Wetlands.

This section limits compliance with 7050.0186 to those projects requiring permits under three existing programs. It is widely recognized that these existing permit programs do not cover all types of wetlands or all types of projects. This qualification should be removed and the requirements for wetland mitigation should be applied to any situation where there "is proposed physical alteration that has the potential for a significant adverse impact to a designated use of a wetland...." The SONAR contains no statement of the need for this limitation of application or of the reasonableness of such a policy. If this limitation is to be included, the Agency should be required to present evidence that the three permit programs included in the program under these rules provides protection for all waters of the state.

3. Regarding 7070.0186, Wetland Mitigation

We strongly support the inclusion of these wetland mitigation policies, principles, and guidelines in the water quality rules. These policies will give the Agency clear guidance and direction for applying Clean Water Act requirements to wetlands. Since they are consistent with the principles being applied under other wetland protection programs unde state and federal law, they provide for a coordinated and strengthene protection of these vital natural resources.

4. Regarding 7050.0212 Subpart 2a. Dredge disposal exemption.

This section exempts dredge disposal facilities from the requirements for total suspended solids and phosphorous. The SONAR justifies this basically by stating that such facilities have difficulty meeting these requirements and that establishing permit limitations that are not achievable causes problems for the agency and the regulated community. No evidence is presented regarding the benefits of these requirements or evidence that these are not necessary for the protection of water quality. Phosphorous and suspended solids create significant water quality problems and dredge facilities should be required to meet the existing standards. Or, the Agency should present a better case that these standards are not necessary for the protection of water quality. The relationship between best management practices and the effluent standards is not clear. Will BMP sufficiently control phosphorous and suspended solids? This is not established. If such an exemption is granted, it should be made clear that if the designated uses of the water body are not being maintained, (as in certain portions of the Mississippi River), the exemption would not apply.

5. Regarding 7050.0470 Classification for Waters in Major Surface Water Drainage Basins. Subpart 4: Upper Mississippi River Basin. (71) and (72), Mississippi River in the Metro Region.

The portion of the Mississippi River included in the Mississippi National River and Recreation area contains three separate stretches, each with a

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different designation: Anoka to St. Anthony Falls (1C, 2Bd, 3B); St. Anthony Falls to Metro Plant (default as unlisted waters -7050.0430- to 2B, 3B); and the stretch from Metro Plan downstream (2C, 3B) In addition, that portion of the Minnesota River which falls within MNRRA is classified as 2C and 2B.

Given the identification of this portion of the Mississippi and Minnesota Rivers by Congress as an outstanding recreational and natural resource deserving of special protective efforts, the classification along this stretch should be uniform and highly protective of the river's potential use as drinking water, as habitat for aquatic and non-aquatic species, and as recreational waters fully protected for swimming. Under current classifications, portions of the corridor are not protected as drinking water sources, and portions are not protected as swimmable resources. The exemption in the rules reducing dissolved oxygen standards for the portion just downstream from the Metro plant (7050.0222, subpart 4) should also be removed.

6. Regarding 7050.0222, Subpart 6, Class 2D Waters.

This section exempts from water quality standards activities in wetlands which involve the normal farm practices of planting, etc., including recommended application of fertilizer and pesticides. The SONAR states that these are exempt by federal permitting requirements. However, states are allowed to have more stringent permitting requirements than federal law requires. The SONAR further states that "The normal farm practices of seeding, cultivating, and applying fertilizers and pesticides will not significantly or permanently alter seasonal wetland uses." No evidence is given for this assertion other than the listing of Exhibit 51, which is a letter from the Minnesota Farm Bureau. We believe that insufficient reasons are given for this loophole in the protection of wetlands in agricultural areas, and that the rules should be amended to remove this exemption.

Thank you for the opportunity to comment on these proposed rule revisions.

Sincerely

Chuck Meyer, Chapter Chair
Ginny Yingling, Conservation Chair
Brett Smith, Mississippi River Activist

cc. Debbie Olson, MPCA
JoAnn Kyral, National Park Service
Peter Gove, Mississippi River Coordinating Commission

MINNESOTA D.R.I.V.E.

Democrat Republican Independent Voter Education

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JOE ORRIE

September 3, 1993

JoAnn Kyral, Superintendent
National Park Service
Mississippi National River and Recreation Area
175 E. Fifth Street, Suite 418, Box 41
St. Paul, MN 55101

Dear Superintendent Kyral:

On behalf of the Teamsters, I am writing to voice our opposition to the Draft Mississippi National River and Recreation Area/Environmental Impact Statement, dated June 1993.

The Teamsters have about 30,000 members and 14,000 retired members who live and work in the Twin Cities metropolitan area. Of particular concern is our membership in the transportation and shipping industries whom we believe will be adversely affected by this MNRRA draft plan. Our membership, which is directly affected, includes truckers, grain elevator workers, barge industry workforce and others.

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1 The plan will adversely affect the Teamsters because the draft plan does not adequately provide for expanded economic utilization of the river and lands along it, and because it is not consistent with existing plans for bridge crossings, road improvements and intermodal transport policies.

We were not contacted to be a part of the planning process. Consequently, we can only review the draft plan as you submitted it for public review. The plan will continue to be opposed by the Teamsters. We join our brothers and sisters in the labor movement in this effort until the draft plan is changed to better provide for economic growth and local governance.

Finally, we believe the river corridor is big enough and diverse enough to provide for both recreation and economic development. This draft will make economic growth much more difficult. As a consequence, it will directly and indirectly hurt our membership and the industries we serve.

Sincerely,

Wes D. Lane
D.R.I.V.E. Representative

WDL/ls/opeiu#12

Democrat Republican Independent Voter Education

1. The final plan allows for expansion and transportation improvements. It also supports the regional transportation planning process.

The Izaak Walton League of America

DEFENDERS OF SOIL, WOODS, WATERS, AIR, AND WILDLIFE

MINNESOTA DIVISION

September 4, 1993

Superintendent JoAnn Kyral
Mississippi National River and Recreation Area
175 East Fifth Street
St. Paul, MN 55101

Superintendent Kyral
Comments on the Draft Environmental Impact Statement:

Our thanks as citizens of Minnesota to the Commission and the staff for the many hours of time they spent in the preparation of this document. Stewardship of our resources often involves intense hours of thinking and planning. Thank you.

Alternatives A and C are unacceptable for the legislated goals.
Alternative B contains some valid points.
The Proposed Alternative with modifications is reasonable.

Comments will refer to specific pages in the text.

1 Page 20 - In light of the 1993 floods, a re-evaluation of the flood plain goals may be wise. Since this is a real life situation, have there been areas damaged that should not be rebuilt in the flood plain? Is the Federal policy likely to be adjusted?

2 Page 21 - A rigorous definition of areas "requiring a location next to the river" needs to be articulated.

Resource protection, site development policies, design guidelines, and public education are fundamental keys to land use protection.

3 Page 24 - Areas behind existing levees that are suggested to new uses should be subject to some land use criteria. They are viewed from the bluffs and the uses can have a physical impact on the river.

Page 26 - Clustering of uses with open space designations and corridors

555 Park Street #140 • St. Paul, MN 55103 • (612) 221-0215

1. See response to comment G-36-4. Some additional emphasis was placed on floodplains; decisions would continue to rely on existing authorities, however.

2. See responses to comments G-8-7 and G-10-1.

3. The levee exception was deleted. See response to comment G-8-2.

is an excellent planning device.

4 Page 27 - Bluff protection is critical. Bluff faces must be unaltered. Have the bluffline setbacks been calculated by visual inspection? These should be minimums. Shoreland setbacks are also only minimum guidelines and can be exceeded.

Page 28 - A very important statement is in the measurement of the cumulative effects and impacts of any actions. This is why an effort like this is needed. Each individual community does not have the resource knowledge to judge the effects of their decisions in conjunction with other communities.

5 Page 29 - Protection of all existing wetlands and the resoration of degraded wetlands is paramount. The health of the river depends on the amount and quality of the wetland buffers.

6 Page 29 - A variance policy should never be based solely on economic considerations. In fact, all other considerations take precedence in variances for new uses of the corridor.

A reasonable alternative to a variance must always include No Action.
A review by the MnDNR is good. Is there a chance for public scrutiny?
Page 37 - Evaluation of erosion regarding barge fleeting is vital.

7 Page 39 - Does a fishable river mean that all the fish caught can be consumed? Will the Agencies work for mercury deposition standards metro and state wide since that is the real problem?

Pages 40 and 41 --
Reducing runoff from construction has been very difficult to achieve. Educating citizens and local government officials is crucial.
The use of integrated pest management and the reduction of fertilizers, pesticides, and herbicides is a great goal. Coordination with many levels of government and concerned citizens can help. The identification of a nuisance pest versus an economic pest would also focus the debate over IPM.
Reduction in road salt and increased sweeping are excellent ideas again for the entire metro area, as everything eventually drains to water.
Our organization has led the fight for double hull barges.
In addition, the railways and highways adjacent to the river should

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4. Bluff and shoreline protection are stressed in the MNRRA plan. A statement that policies could be exceeded by local governments was added.

5. Emphasis was added for wetland protection. See response to comment G-36-4.

6. Variance decisions would be made in accord with the existing state statutes. The policy was simplified to state just that.

7. The goal is to improve water quality so that fish caught in the river would be edible.

be used only by spill proof containers and vehicles.
Promotion of appropriate vegetation, combined with a reward/recognition mechanism would reduce fertilizers, create buffers, and provide habitat.
Marina dumping stations must be mandatory.
Support efforts of the MNPCA and MNDNR to restore the Minnesota River which will obviously help the Mississippi River as well.
Studies of the river bottom sediments could help all planning decisions.

Pages 41 - 48
All Research efforts will help to build a base of knowledge upon which to make reasoned decisions. Utilizing the University of Minnesota in this effort is a key. Also, bringing in students from the other institutions along the corridor (Community Colleges, private colleges, Vocational institutions, High Schools) could provide the people power for surveys, education, volunteer labor, etc..

8

Page 51 - No Wake Zones on the main channel should stabilize the banks and also encourage nonmotorized uses of the river.
Page 56 - A very important statement is found on this page:
"All living things (including humans) in the MNRRA corridor are interdependent."
The important thing to remember is that the actions of humans have the impact on all other creatures. We make the choices.
Pages 75-78
Implementation of the plan to include local, state, and federal jurisdictions is essential. There are different pressures exerted at each level by interest groups and users. In this implementation plan the balancing of roles should work.
Other General Comments:
More emphasis could be given to the historic cultural ties to the river of our Native American population and current ties to the river of our new multi-ethnic population.

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All future planning and implementation efforts should include more representation of real people who do not have traditional affiliations.
Contacts should be made with the Minnesota Environmental Education Board to coordinate efforts with their Greenprint for Environmental Education. State funds may be available through the LCMR process.

Thank you again for the public comment opportunity. Charlotte Brooker
Vice President
Char Brooker

8. The National Park Service and partners would use all available resources, including university assistance where appropriate.

9. See response to comment O-2-7.

THE McKNIGHT FOUNDATION
600 TCF Tower
121 South Eighth Street
Minneapolis, Minnesota 55402
612-333-4220

September 9, 1993

Mr. Peter L. Gove, Chair
Mississippi River Coordinating Commission
Mississippi National River and Recreation Area
USDI National Park Service
175 Fifth Street East, Suite 418
Box 41
Saint Paul, MN 55101-2901

Dear Mr. Gove:

Thank you for the opportunity to review and comment on the draft comprehensive management plan and environmental impact statement for the Mississippi National River and Recreation Area. The Foundation is interested in the plan because of our long-standing concern for the vitality of many of the communities which abut the river. In addition, protecting and restoring the health of the Mississippi is a principal goal of our environment program.

While most of the public debate about the plan has focused on the balance between environmental protection and economic uses of the river, our principal concern is with the location and type of interpretive facilities and programs offered at the recreation area. It is through these interpretive programs that most residents of the Twin Cities, as well as visitors to our area, will encounter the park and learn about the Mississippi and its role in our region's environment and economy. It is important, therefore, that these facilities be of the highest quality, and offer opportunities to learn about the river that will attract the widest possible audience.

1 We were disappointed, therefore, that the opportunity to site the Saint Paul visitor center on the downtown waterfront was not considered in the plan. We believe that such a downtown waterfront site might have several advantages over the site proposed on Harriet Island:

- o Interpretive opportunity. The downtown waterfront offers superb views up and down the Mississippi, historic sites associated with the development of Saint Paul and the state of Minnesota, overviews of workboats, the landing for the Delta Queen paddlewheeler, a transportation intersection linking barges, railroads, and highways, an outlet where urban stormwater drains to the river, and many other features associated with the interpretive themes emphasized in the draft plan.

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1. Numerous locations for the NPS center were considered by the planning team and commission early in the interpretive facility planning process. Many were rejected because they would not meet some key criteria. The National Park Service would continue to work with potential partners to encourage cooperative and complementary locations for coordinated activities in the general Harriet Island area. The plan was revised to better explain how a variety of sites were considered before the Harriet Island site was chosen. The plan does place a major emphasis on partnerships and critical mass, so it was also revised to state that if a better opportunity were to develop to combine the center with another major visitor attraction in the general vicinity, the Harriet Island site could be reconsidered. Such a proposal would require extensive coordination with area partners, environmental review, and public input.

- o Year-round visitor use. A downtown waterfront site could be linked to the city's skyway system, encouraging greater year-round use by visitors. In addition, it would draw downtown workers and residents, increasing attendance at MNRRA facilities and broadening the audience for MNRRA's interpretive message.

- o Economic development. A downtown waterfront site would bring thousands of MNRRA visitors into the downtown, where they could enjoy opportunities to dine, shop, and find lodging as part of their MNRRA visit. In this way, the visitor center would be a practical embodiment of the MNRRA plan's vision of integrating environmental protection and economic development.

- o Historic preservation. The old Union railroad depot concourse might be one potential site for a visitor center on the downtown waterfront. Adaptive reuse of such an historic structure would both protect an important piece of Saint Paul's heritage as well as provide a model for others considering reuse of historic structures.

- o Building on other investments. A downtown waterfront visitor center would reinforce millions of dollars of public and private investment in the city's downtown waterfront, including the parks and walkways along Kellogg Boulevard, the improvements to Shepard and Warner Roads, and the revitalization of Lowertown. Additional funding, such as ISTEA funds, might also be easier to attract to the area.

- o Lower environmental impact. A downtown waterfront site would not require creation of additional paved area, would not increase surface water runoff, would be served by existing public transit systems, and would not be located behind a levee where it might hinder levee maintenance in a flood fight or be exposed to flood damage in the event of levee failure.

For all these reasons, we believe that a downtown waterfront site for MNRRA's Saint Paul interpretive center deserves serious consideration. Our discussions with MNRRA staff and commissioners, as well as city officials in Saint Paul, have convinced us that opportunities to site the visitor facility on the downtown waterfront have not been adequately reviewed.

To provide an opportunity for this additional consideration, we offer our services in convening a meeting of MNRRA staff and commissioners, Saint Paul city officials, and architects familiar with the downtown waterfront to more fully explore alternative visitor center sites. We would also suggest participation by staff from the Science Museum of Minnesota in such a meeting, so that the opportunities for adjoining or co-located museum and park service facilities on a downtown waterfront site might be considered at the same time.

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2. The NPS staff has discussed potential partnerships with the Science Museum of Minnesota. In the MNRRA plan, the concept of critical mass emphasizes the need for partnerships on Harriet Island. As plans for the riverfront develop, the National Park Service would continue to discuss a range of partnership possibilities with the museum. A statement on retaining flexibility in regard to the precise location of the NPS interpretive facility was added to the final plan.

Thank you for consideration of our concerns about this issue. Please feel free to call me so that we can begin scheduling a meeting to discuss this issue further.

Sincerely,

Michael O'Keefe

Michael O'Keefe
Executive Vice President

MOK:cm

cc: Weiming Lu
James L. Peterson
Kenneth Peterson
Mayor James Scheibel

COMMENTS

September 4, 1993

115 First Place
Hastings, Mn. 55033

Joann M. Kyral, Superintendant
Mississippi National River & Recreation Area
175 East 5th Street
Suite 418
St. Paul, Minnesota 55101

Dear Mrs. Kyral:

I appreciated the opportunity to meet with you last Thursday to discuss our objections to the MNRRA draft plan. As you know, the Oil Chemical and Atomic Workers union has a great number of members working at facilities located within the Mississippi National River and Recreation Area (MNRRA) corridor.

We believe that our membership and their families will be put at serious economic risk if the MNRRA draft plan/EIS dated June 1993 is adopted because among other reasons that I have conveyed to you, it will:

- *Impose new and unnecessary regulations*
- *Cause unnecessary delays in the permitting process*
- *Put the industries we serve at a competitive disadvantage by having to submit to new regulatory oversights that will not be imposed on their competitors.*

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1 *The plan should not impose any new regulations until a serious effort is made to "better coordinate and consolidate" the existing regulatory process, which P.L. 100-696 requires. In addition, the plan is not practical for management of a diverse, urban river and it lacks a realistic strategy for economic use of the river corridor, while providing recreational opportunities.*

2 *The plan must be revised to provide a much clearer pathway for economic use(s) of the river and adjacent lands. It must be revised to truly retain local control of land use decision making. It must be revised to ensure timely permitting of the full range of land uses. And it must be revised to be more responsive to the reality that it is and must remain an urban, "working river".*

The OCAW cannot and will not support this plan unless and until these revisions are made and request that these objections be placed in the MNRRA Hearing Record.

Once again, I wish to convey our offer to work and cooperate with you to bring about a plan that is fair and equitable to all concerned.

Sincerely,
Larry Hunter
Larry Hunter

RESPONSES

1. The plan does not impose new regulations and supports efforts to coordinate and consolidate the existing regulatory process.

2. The plan was revised to encourage sustainable economic use and retain local control; it supports the concept of a working river.

WEST SIDE CITIZENS ORGANIZATION

625 Stryker Avenue St. Paul, MN 55107 293-1708

Congratulations, Mississippi River Coordinating Commission and National Park Service, on the completion of the Draft Comprehensive Management Plan and EIS. Your effort has created a truly comprehensive and thoughtful document. Representing a community within the MNRRA corridor, the West Side Citizens Organization (WSCO) Environment Committee wishes to thank the commissioners and staff for their hard work and offers these comments on the plan.

WSCO is the District 3 planning council in St. Paul and speaks for the residents of St. Paul's West Side. The West Side's boundaries have been described as "the Mississippi, the Mississippi, the Mississippi, and Annapolis Street." Despite the close connection and affinity West Siders feel for the Mississippi, it is difficult for us to get physically close to the river or enjoy its recreational potential. The major portion of the West Side's floodplain is occupied by Holman Field and an industrial park. On Harriet Island, where people once swam, now is a rusty chain link fence that guards the deteriorating concrete shoreline. While Lilydale park remains unused and virtually inaccessible, a 500 year floodwall is being built to protect the industrial park, rising like castle walls to screen the West Side from sight or contact with the river.

The West Side has been fighting for a more attractive, accessible riverfront for years and is excited about the huge step toward that goal that MNRRA represents. We applaud the vision of MNRRA as "stimulating tourism, compatible visitor use, recreational activities, community livability, compatible residential uses and high quality sustainable development" and offer these suggestions to enhance that vision.

1 The West Side sincerely and warmly welcomes the National Park Service to Harriet Island. Locating the NPS headquarters and interpretive center there meshes perfectly with the Lilydale/Harriet Island plan and will enhance the attractiveness of that area. This location offers the visitor firsthand experience with the plan's major interpretive themes - the river as "natural wonder" and "the working river" - as Harriet Island acts as the transition between the wildness of Lilydale Park and commercial barge operations. The nature of this location highlights the strengths and weaknesses of the Draft Plan.

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1. During design of this facility the National Park Service would continue to work with the city of St. Paul, neighborhood groups, and others to make sure that this development is a welcome neighbor.

COMMENTS

The vision of a continuous trail system is enlightened. The plans already exist for trails from the far west end of Lilydale to Holman Field on the east and they will be emphasized by the MRRRA plan.

2 Since the primary focus of the entire MRRRA concept is the river itself, water quality deserves the highest priority. While Harriet Island was once a swimming beach, changes have occurred which may make it undesirable to be made one again. However, the impact on visitors would certainly be great to learn that it is safe to swim and fish and safely eat the fish there in the midst of a large industrial city. Toward this goal, pollution prevention is the key and should be actively pursued and attained through the plan, rather than merely "encouraged."

The Harriet Island location also reveals that transportation systems can pose a great threat to the health of the river. Barges steadily pass that location when the river is open and railroad tracks criss-cross the river and nearby industrial park.

3 The need for double-hulled barges and diversion of certain cargo or accident prevention and response systems for the railroads is clearly needed and, again, must be mandated rather than "encouraged." Imagine the embarrassment to the entire MRRRA concept should a hazardous spill occur just outside the door of NPS headquarters.

As the approximate mid-point of the corridor and headquarters for the NPS, the attractiveness of the approach to Harriet Island is critical and presents the best opportunity to demonstrate to visitors, students, ourselves and other urban areas throughout the nation that commercial and industrial uses that depend on the river can and do contribute to the river experience. For this

4 reason, and because the levee from Harriet Island to Holman Field runs right along the shoreline, the areas behind levees should not be exempted form the riverfront use policy. Because of the heavy commercial use, the section of the river near Harriet Island is experienced much more from the shore than from the river. The levees do not act to cut off the industries from the sight and mind of visitors, but cut off visitors from sight of the river.

5 The flooding this summer also emphasized one of the roles that wetlands play in the life of the river. Protection and restoration of wetlands in the corridor should improve the quality of the river and help to protect other properties from flooding. Lilydale Park contains a wetland that was partially filled years ago and which could serve as a prime wetlands restoration project. The Plan should prohibit future loss of wetlands and encourage their restoration.

The West Side is also known for its sandstone bluffs. Many caves have been dug in these bluffs in the past, but few are used today. Aside from the caves that provide desirable bat habitats, many caves on the West Side now serve mainly as an attraction for

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RESPONSES

2. A statement was added to the plan stating that water quality is a high priority.

3. Spill prevention is emphasized in policy 15 under Natural Resources Management in the final plan.

4. The levee exception was dropped. See responses to comments G-8-2, G-8-7, and G-10-1.

5. Wetland protection was further stressed in the final plan. See response to comment G-36-4.

6 children which too often turns deadly. Because of this, the exclusion of caves from the prohibition of land disturbances on the bluffs seems unwarranted. If that policy protects some crucial property right, perhaps the exclusion can be more narrowly drawn so that it also protects our children.

The VSCO Environment Committee believes that the MNRRA corridor will serve as a model for future designations of its kind along the Mississippi and other great rivers of our nation. We sincerly thank the commission and the National Park Service for their work on the Plan and look forward to working with you to continue to improve the health of the Mississippi for years to come.

Sincerely,

David Boyce
Environment Committee Chair

6. The final plan states that safety is a high priority in all river corridor plans and activities.

Superintendent, MNRRA
175 E. Fifth St., Suite 418, Box 41
St. Paul, MN 55107
612-290-4160

Comments on the MNRRA Comprehensive Management Plan and EIS
9-9-93 by Jim Bukowski, West Side Citizen's Organization (WSCO)

The following is a review of an NPS proposal and its alternatives, relevant sections of the draft proposal, and an evaluation and review of the West Side Community's vision for Lilydale, Harriet Isle, and other downstream areas included in the MNRRA plan. My comments are based on my work with a committee of six to ten people who drafted the Harriet Isle/Lilydale Master Plan, now approved by the City of St. Paul. Our two governmental representatives, Dave Thune and Sandra Pappas, were the main people who have been involved in the MNRRA discussions to date.

In general, the Proposed Plan is widely acceptable. However, our community would prefer an emphasis on what Alternative B offers, in terms of resource preservation and a strong NPS role in overall corridor management as well as an NPS/Local partnership in monitoring land use plans and actions. At this time there seems a regrettably widespread distrust and disillusionment with the Metro Council as an effective management agency. NPS in many cases will do well to work directly with affected communities more than the Metro Council does. With hope, there will be a reorganization of this agency which will provide more response to local municipal and community concerns in the future. Meetings should be scheduled with organizations such as the St. Paul District Planning Councils, of which WSCO has been an early pioneer and leader in local community planning and government relations.

As for the basic concept of park land ownership, the West Side favors regional use with strong local control at the Harriet-Isle/ Lilydale Regional Park. Preservation, restoration and protection of shorelines, bluffs historic and natural areas are very important to our community. NPS should help to restore good fishing to Lake Pickerel and help monitor pollution there. Protection of cultural and existing economic resources and open space is important to us as well. There is interest in an extensive interpretive center, one which could explain the geology and fossils of the area, and give exhibit space to the various cultural groups that have rich histories in our area. The West Side has a Historical Society that needs a better home base - perhaps NPS could help us and other adjacent communities with this foundation of our areas' cultures.

7

7. This is part of the basic land use concept in the MNRRA plan.

The West Side welcomes visitors and hopes that a broad range of activities can be provided in areas appropriate for them. We consider the two parks mentioned above as our front yard. We are proud of them, and have taken actions to clean and preserve them. We would like to see new vegetation (mixed conifers, hardwoods and shrubs) of species native or typical to this area. When floods occur it is important that existing pollution prevention plans have allowed for control of hazardous materials and fertilizers and protection of sensitive environments from polluting storm runoffs. The West Side has an active Environment Committee which has undertaken many significant project in these areas. We need NPS support in our efforts.

Our community has an active Building and Land Use Committee which should be consulted early, when new or changed uses are being proposed. An important issue that should be discussed is whether or not to build an amphitheater to occupy a large area of land between the Robert and Wabasha St. bridges, paving over the river flats, not to be used for the majority of each year. Another issue is whether or not to allow RV camping facilities in Lilydale Park, as this might conflict with the desire to have a Scout campgrounds near Lake Pickerel.

8

In all of these matters NPS should listen to our concerns, and consult us when changes are proposed for District 3 areas bordering the river. We would like to have some say in the design and functional plans for the NPS headquarters/ interpretive center for Harriet Isle.

West Side Citizens Organization can be contacted at the following address and phone:

West Side Citizens Organization
625 Stryker Ave.
St. Paul, MN 55107

293-1708

387

8. The National Park Service and the city of St. Paul would continue to consult with the public on interpretive center development.

612/224-9445

Saint Paul
Building and Construction Trades Council

LABOR CENTRE, 411 MAIN STREET, ROOM 206
SAINT PAUL, MINNESOTA 56102

September 8, 1993

National Park Service
Attn: JoAnn Kyral, Superintendent
Mississippi National River and Recreation Area
175 E. Fifth St., Suite 418
P.O. Box 41
St. Paul, MN 55101

Dear Superintendent Kyral:

For the hearing record, the St. Paul Building and Construction Trades Council expresses its opposition to the June 1993 - Draft Mississippi National River and Recreation Area Plan/Environmental Impact Statement.

1 We oppose this draft plan because it will hamper needed shoreline development by imposing new zoning regulations and will doubtless require more time in the review of proposed construction projects. Some of the proposed regulations put unreasonable restrictions on needed economic development and this will cost us jobs. We adamantly disagree with the EIS conclusion that the draft plan will have little negative effect on jobs. It will. Much work has already been done by local governments to develop responsible riverfront plans. Yet according to many local governments, the MNRRA Plan is inconsistent with their existing plans. By making the construction permitting process more cumbersome and expensive, and removing it from local administration, there will be less riverfront re-development, and this will cost union jobs.

2 We don't believe the plan should impose any new regulations until it has provided for the consolidation of the permitting process as the law directs.

The Mississippi is not a pristine, remote river. It is an urban river where its riverfront lands are among the most valuable of any in the region to support high-quality commercial and other development. It is an area where literally hundreds of millions of dollars worth of quality construction projects can be adversely affected by this draft plan. We believe that unless the plan is

3 revised to better provide for economic use of the corridor, it will cost hundreds of construction jobs.

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1. Local government would be in control and MNRRA reviews would be concurrent.

2. See responses to comments B-10-3 and B-12-4.

3. The plan was revised to encourage sustainable economic activities that are consistent with resource protection.

We know that the new uncertainties created by this vague, draft plan have already caused discussions about the negative effects it will have on future construction.

The Building Trades are the backbone of the region's construction industry. We know this industry well. We believe the draft plan will cause unnecessary construction delays and job losses.

We want a plan that is balanced and realistic. This draft plan is neither.

Sincerely,

Dick Anfang

Dick Anfang
Executive Secretary

DA/df
afl-cio
opeiu#12

389

MINNEAPOLIS BUILDING & CONSTRUCTION TRADES COUNCIL
Affiliated with
BUILDING & CONSTRUCTION TRADES DEPARTMENT • AFL-CIO

United Labor Centre
312 Central Avenue, Room 556
Minneapolis, Minnesota 55414

Phone: (612) 379-4234
Fax: (612) 379-4479

September 7, 1993

National Park Service
Attn: JoAnn Kyral, Superintendent
Mississippi National River and Recreation Area
175 E. Fifth St., Suite 418
P.O. Box 41
Minneapolis, Mn 55101

Dear Superintendent Kyral:

For the hearing record, the Minneapolis Building and Construction Trades Council expresses its opposition to the June 1993 - Draft Mississippi National River and Recreation Area Plan/ Environmental Impact Statement.

We oppose this draft plan because it will hamper needed shoreline development by imposing new zoning regulations and will doubtless require more time in the review of proposed construction projects. Some of the proposed regulations put unreasonable restrictions on needed economic development and this will cost us jobs. We adamantly disagree with the EIS conclusion that the draft plan will have little negative effect on jobs. It will. Much work has already been done by local governments to develop responsible riverfront plans. Yet according to many local governments, the MNRRA plan is inconsistent with their existing plans. By making the construction permitting process more cumbersome and expensive, and removing it from local administration, there will be less riverfront re-development, and this will cost union jobs.

We don't believe the plan should impose any new regulations until it has provided for the consolidation of the permitting process as the law directs.

The Mississippi is not a pristine, remote river. It is an urban river where its riverfront lands are among the most valuable of any in the region to support high-quality commercial and other development. It is an area where literally hundreds of millions of dollars worth of quality construction projects can be adversely affected by this draft plan. We believe that unless the plan is revised to better provide for economic use of the corridor, it will cost hundreds of construction jobs.

We know that the new uncertainties created by this vague, draft plan have already caused discussions about the negative effects it will have on future construction.

Asbestos Workers No. 34
Asbestos Workers No. 205
Boilermakers No. 647
Bricklayers No. 2
Cabinet Makers and Millmen No. 1865
Carpenters No. 851
Carpenters and Floorlayers No. 1644
Carpet and Linoleum Layers No. 596
Cement Masons No. 633
City Employees No. 363
Dock Builders and Pile Drivers No. 1847
rivers No. 221
electrical Workers No. 292
Elevator Constructors No. 9
Glaziers & Glassworkers No. L-1324
Iron Workers No. 512
Iron Workers Shopmen No. 535
Laborers No. 563, Construction and General
Lathers No. 190
Millwrights No. 548
Operating Engineers No. 49
Painters No. 386
Pipe Fitters No. 539
Plasterers No. 2065
Plaster Tenders No. 111
Plumbers No. 15
Roofers No. 96
Sheet Metal Workers No. 10
Sign Painters No. 880
Sprinkler Fitters No. 417
Terrazzo Workers No. 5
Terrazzo Workers Helpers No. 107T
'ile Layers No. 18

See response to similar letter O-17.

Page 2
National Park Service
Attn: JoAnn Kyral, Superintendent
September 7, 1993

The Building Trades are the backbone of the region's construction industry. We know this industry well. And we believe tht draft plan will cause unnecessary construction delays and job losses.

We want a plan that is balanced and realistic. This draft plan is neither.

Sincerely,

Ray Waldron,
Business Manager

RW:sp
opeiu #12 afl-cio

391

Marcy-Holmes Neighborhood Association
University Technology Center, Rm. 138
1313 5th Street S.E.
Minneapolis, Minnesota 55414

(612) 379-3814

September 9, 1993

Superintendent, Mississippi
National River and Recreation
Area
175 East Fifth Street
Suite 418 Box 41
St. Paul, MN 55101

Dear Sirs:

The Marcy-Holmes Neighborhood Association (MHNA) has reviewed the comprehensive management plan/draft environmental impact statement (DEIS) for the Mississippi National River and Recreation Area. We commend the National Park Service (NPS) for taking the lead on developing a comprehensive plan for this valuable cultural, historical and commercial resource. We want to take this opportunity to comment briefly on the draft released June 1993, especially since the Marcy-Holmes neighborhood stretches along the East Bank of the Mississippi from the University of Minnesota to St. Anthony Falls.

1 MHNA encourages the NPS to continue placing a high priority on public involvement in the process. As the plan moves into implementation, we feel the NPS needs to place an even greater emphasis on communicating the implications of the plan on the specific locations affected. Since implementation involves such a wide array of players (DNR, Metropolitan Council, local governments, etc) NPS must constantly monitor compatibility and help encourage the other players, identified as filling partner roles, to do the same and to incorporate the goals, visions of the plan into their own local plans. (pp.75-84)

2 We support the open space and trails concept of Alternate B. Our neighborhood provides the critical link between the eastern end of the Stone Arch Bridge and the River Road near the East Bank of the University of Minnesota. We firmly believe that improved access to the river via pedestrian and bicycle trails fosters a higher level of concern, responsibility and stewardship. To the extent possible, the trails need to highlight and respect the historic nature of the neighborhood. (pp. 28-33 & 95-96)

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1. Statements were added in support of continued public involvement.

2. The proposed plan could achieve these desired outcomes.

Marcy-Holmes Neighborhood Association
University Technology Center, Rm. 138
1313 5th Street S.E.
Minneapolis, Minnesota 55414

(612) 379-3814

3 We are enthusiastic about the educational opportunities offered by the Minneapolis/St. Anthony interpretive center. Again, we support the visitor use and interpretation section of Alternative B which emphasizes stewardship of corridor resources. Educational materials should call attention to activities that degrade the environment (pollution, overdevelopment & inappropriate land use practices) as contrasted with wise stewardship practices. The NPS-operated tour boats to aid interpretation of the river for visitors and school groups seems very useful in establishing an educational base for our area's children. (p. 86)

Although the legislation establishing MNRRA is mainly permissive in nature and non site-specific, MHNA does want to use particular local problems to emphasize general concerns :

MULTIPLICITY of AGENCIES
In our stretch of the Mississippi there are the following landowners:

a) The University of Minnesota, a constitutionally independent agency

b) The Corps of Engineers, a federal agency

c) The Minneapolis Park & Recreation Board, a city agency

d) Northern States Power Co & Burlington Northern Inc, utility companies

4 We believe these agencies, with their differing purposes, need really strong leadership from MNRRA as expressed in Alternative B under corridor management.

INCONSISTENT USE
The decision of the University to maintain and develop its southeast steam heating plant with coal as a major fuel at the foot of the Stone Arch Bridge within 300 feet of the shoreline represents a major challenge for MNRRA.

We support the resource management concept of the proposed plan, but lean to the greater emphasis in Alternative B on

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3. Stewardship is an important element in the proposed plan also.

4. One of the primary purposes of the Mississippi National River and Recreation Area is to coordinate activities, and that is supported in the proposed plan.

Marcy-Holmes Neighborhood Association
University Technology Center, Rm. 138
1313 5th Street S.E.
Minneapolis, Minnesota 55414

(612) 379-3814

Thank you for listening and taking these suggestions into consideration. We have a lot at stake here, so please keep us informed.

Sincerely,

Tod S. Elkins

Tod Elkins
President, MHNA
on behalf of the Marcy-Holmes Neighborhood Association

TE/mcb
cc:Citizens for a Better Environment

seward neighborhood group, inc.

September 9, 1993

Mr. Peter Gove, Chair
Mississippi River Coordinating Commission
c/o Mississippi National River and Recreation Area
175 East Fifth St., Suite 418, Box 41
St. Paul, MN 55101

Dear Mr. Gove:

I am writing on behalf of the Seward Neighborhood Group to express our support for the draft plan proposed by the Mississippi River Coordinating Commission. Additionally, we are in support of setting up a strong structure to monitor water pollution and to put into action effective correction processes when such pollution occurs.

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1 Additionally, we are in support of proposals by Citizens for a Better Environment to more adequately address such issues as:

Enforcement of point source pollution regulations and aggressive pollution prevention efforts;

Specific steps to implement clearly stated water quality goals: Wetland protection and restoration;

A strong leadership role by the park service: Protection and restoration of existing open space (plan B);

Involvement of and sensitivity to the needs of varied ethnic and economic groups in planning public use and interpretation;

Consultation with Native American groups about impacts on their cultural sites along the corridor;

Extensive Park Service interpretive sites emphasizing human impacts on the river and the need for stewardship to preserve and restore it;

A strong role by the Park Service in facilitating development of a continuous trail system adjacent to the river corridor; Encouragement of non-motorized recreational use.

Norwest Bank Building • 2600 East Franklin Avenue • Minneapolis, Minnesota 55406 • (612) 338-6205

1. See responses to comments in letter O-3.

We hope that the final plan will actualize the legal mandate to "provide for adequate and comprehensive resource management and economic development consistent with the protection of the Mississippi River Corridor's nationally significant resources."

We thank the Commission for their many hours of dedicated effort, and appreciate their provision of this opportunity for input by our neighborhood organization.

Sincerely,

Carol S. Greenwood

Carol S. Greenwood
Board Member, Seward Neighborhood Group

UAW MINNESOTA STATE COMMUNITY ACTION PROGRAM COUNCIL
Suite 1341, One Appletree Square
Bloomington, Minnesota 55425
(612) 854-5323 FAX (612) 854-5325
INTERNATIONAL UNION, UNITED AUTOMOBILE, AEROSPACE & AGRICULTURAL IMPLEMENT WORKERS OF AMERICA-UAW

September 10, 1993

National Park Service
Mississippi National River and Recreation Area
175 E. Fifth St., Suite 418
P.O. Box 41
St. Paul, MN 55101

ATTENTION: JoAnn Kyral, Superintendent

Dear Superintendent Kyral:

The United Auto Workers (UAW) Union is opposed to the draft Mississippi National River and Recreation Area Plan/Environmental Impact Statement.

1 We believe that the proposed plan would place unreasonable restrictions on future development which may occur at the Ford plant in St. Paul, which is located with the river corridor boundary.

We have discussed the plan draft with other representatives of organized labor who believe the plan will also be harmful to their members. Basically, the plan needs to be changed to
2 provide for economic uses of the river corridor which we believe is called for in the legislation. We don't believe adequate provision is made for economic growth along the river. There should be a specific, realistic plan to provide for such growth. The present plan draft only gives lip service to such economic uses.

We are committed to working with others in organized labor to ensure that the plan is revised to provide for economic development within the river area.

Sincerely,

Gary L. Berg
Chairperson
UAW MN STATE CAP COUNCIL

Patrick T. Devery
Secretary-Treasurer
UAW MN STATE CAP COUNCIL

GLB:js:Opeiu#494

AMERICA WORKS BEST WHEN WE SAY . . .
UNION YES!

397

1. This is a very general claim that is not substantiated by specific concerns or examples. However, in an attempt to reduce concerns about limits on expansion of existing business, a statement was added to the plan that adds detail. It basically says that expansion is acceptable as long as there are no significant adverse impacts on the river corridor.

2. Additional statements were added to provide for existing economic uses and sustainable economic growth.

International Union of Operating Engineers

LOCAL UNION NO. 49, 49A, 49B, 49C, 49D and 49E
MINNESOTA • NORTH DAKOTA • SOUTH DAKOTA (East half)

JON R. PENDZIMAS, *President*
JACK L. GUY, *Vice President*
JOHN M. SCHOUVELLER, *Recording-Corresponding Secretary*
JOHN H. PETERSON, *Treasurer*



Affiliated with A.F.L.-C.I.O.

September 10, 1993

FRED P. DERESCHUK, *Business Manager-Financial Secretary*
2829 ANTHONY LANE SOUTH — MINNEAPOLIS, MINNESOTA 55418
Phone: (612) 788-9441

National Park Service
Attn: JoAnn Kyral, Superintendent
Mississippi National River and Recreation Area
175 E. Fifth St., Suite 418
P.O. Box 41
St. Paul, MN 55101

Dear Superintendent Kyral,

The Operating Engineers (Local 49'ers) Union is writing to express its opposition to the Mississippi National River and Recreation Area (MNRRA) Draft Plan/EIS dated June 1993.

1 The Mississippi River is a "working" urban river. It has been so for many decades and should remain so into the future. The Operating Engineers serve many industries which keep the river working as a backbone of the region's economy.

2 We believe that the MNRRA draft plan does not adequately value the need for economic growth, alongside recreation uses, of the river corridor. The MNRRA draft recommended (Alternative A) plan states it balances economic and other uses. We disagree. There is no specific plan for economic growth.

Our representatives participated in "stakeholders' meetings to review the MNRRA Plan Draft/EIS. We support the position paper adopted by consensus of the stakeholders. And we join our brothers and sisters in the AFL-CIO member unions and the Teamsters in urging changes to the draft to ensure it will be better provide for economic uses of the river corridor, and the jobs our membership wants.

Sincerely,

INTERNATIONAL UNION OF OPERATING
ENGINEERS, LOCAL NO. 49

Donald J. Egan

Donald J. Egan
Area Business Representative

BRANCH OFFICES

Box 279, Hibbing, MN 55621, (218) 262-3862
2002 London Road, Duluth, MN 55812, (218) 724-3840
Rt. 9, Box 302, Mankato, MN 56001, (507) 625-3670
111 - 3rd St. S.W., Rochester, MN 55902, (507) 282-0401
307 - 1st St. North, Virginia, MN 55792, (218) 741-8190
1600 W. St. Germain St., St. Cloud, MN 56301, (612) 252-2162
Box 686, Bismarck, ND 58502, (701) 663-0407
3002 1st Ave. No., Fargo, ND 58102, (701) 232-2759
Box 1715, 724 Washington N., Grand Forks, ND 58206, (701) 775-3969

DJE:bes
opeiu#12afl-cio
se1093.1

398

1. While the term "working river" is not in the legislation and has no specific legal meaning, it is a commonly used expression for a concept of management and use that was adopted by the commission as one element for the plan. Statements were added to further emphasize the working river concept in the final plan.

2. The plan reflects the MNRRA legislation, which does not list economic growth as a purpose; it does list as the first purpose in the act "protect, preserve, and enhance the significant values of the waters and land of the Mississippi River corridor in the Saint Paul-Minneapolis Metropolitan Area." However, additional statements were added to provide for sustainable economic growth.

SENSIBLE LAND USE COALITION

PO Box 284
Excelsior, MN 55331-9998
Phone (612) 474-3502
Fax (612) 470-6610

September 10, 1993

Ms. Joanne Kyral, Superintendent
Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418
Box 41
St. Paul, MN 55101

RE: Draft Comprehensive Management Plan/Environmental Impact Statement for Mississippi National River and Recreation Area

Dear Ms. Kyral:

I write on behalf of the Sensible Land Use Coalition (SLUC) Board of Directors to provide comments regarding the draft comprehensive management plan for the Mississippi River. SLUC is an organization of individual and corporate members who work for both public and private entities in land planning and development. Our membership is concentrated heavily within the Metropolitan Area. SLUC is now 14 years old and is the largest organization which focuses exclusively on land use issues in the State of Minnesota. SLUC provides members with information concerning major land use planning and development issues, facilitates the exchange of ideas and experiences relating to land use and environmental planning and regulation, and at times provides comments with regard to major land use planning and control initiatives. SLUC is not a lobbying organization; it is fundamentally engaged in the study and assessment of planning and control initiatives designed to use, protect, and preserve land and natural resources in our area.

SLUC strongly supports the planned management of the Mississippi River Corridor for all types of land and water uses. SLUC members are all, in one way or another, engaged in some form of resource planning and view comprehensive planning as an absolute necessity in arranging for the wise use and preservation of our resources.

1 SLUC has two basic concerns about the draft Mississippi National River and Recreation Area Comprehensive Plan (the MNRRA Plan). The first is the coordination of the MNRRA Plan with the existing metropolitan/local planning and land use regulatory system and the second relates to governance issues, including regulatory complexity and duplication in connection with plan implementation.

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1. With the revised land use management strategy, there should be little duplication with existing systems. Existing review structures would be used, reviews would be concurrent, and existing agencies would be responsible for the review. NPS review of federal actions is mandated by the MNRRA legislation. Coordination would be a major goal in the process.

The Minnesota Legislature in 1976 established one of the first mandatory regional/local land use planning systems in the United States. The Twin Cities Metropolitan Area, to our knowledge, remains the only major urban area in the United States operating under a statutorily mandated coordinated regional/local land use planning system. This system was developed with extensive local, regional, state and some federal government, as well as citizen involvement. It took four years of intense public participation to develop and enact an acceptable and meaningful regional/local interactive land use planning and control system. The resources devoted to this effort were enormous.

The Metropolitan Land Planning Act, Minn. Stat. § 473.175, requires all cities and counties in the Metro Area to prepare local plans which must be coordinated and compatible with Metropolitan "System" plans addressing the areas of land use, sewers, transportation, parks and open space. The Metropolitan Council was given the power to review and approve these plans in relation to their compatibility with the metropolitan systems. Both the Metropolitan System plans and the local comprehensive plans were developed in recognition of and attention given to many other state, regional and federal planning and regulatory initiatives, including the Mississippi River Corridor Critical Areas Plan, which was developed in 1973/74. Conforming local plans were first developed, reviewed and adopted in 1980. Both the Metropolitan System plans and the local plans have been updated and modified since the initial plan preparation and adoption.

The Metropolitan regional/local land use planning and control system is now fully implemented and largely effective. It has achieved overall coordination of regional/local land use planning and implementation. Its implementation is supported by one of the best project specific environmental review mechanisms in the United States overseen by the Environmental Quality Board and by the Metropolitan Significance Review Regulations, which enable the suspension of projects having adverse impact on Metropolitan Systems. It is also supported by one of the strongest Environmental Rights Act statutes in the United States and by a multitude of state and federal land use and environmental permitting mechanisms administered by the Minnesota Pollution Control Agency, the Department of Natural Resources, watershed management organizations, the Army Corp. of Engineers, the Environmental Protection Agency, and others.

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2 A cursory review of the proposed MNRRA Plan leads to the conclusion that the Plan's contents, policies and objectives are extremely similar to those now contained in the operative regional and local plans now in force in the Metropolitan Area. In particular, there seems to be very little difference between the Plan and material contained in the Mississippi River Critical Area Plan, the Metropolitan Development Framework, and the Metropolitan Parks and Open Space Policy Plan. As a result, question arises as to whether a new master plan will foster better coordination of land use planning and decision-making in the Mississippi River Corridor or whether it will contribute to conflict and a lack of coordination. Without experiencing the effect of a two plan -

2. The MNRRA plan incorporates and builds on local and regional plans.

3 federal and regional/local - system, a definitive answer cannot be provided. As experienced land use planners, however, we question the need for and are concerned that the existence of two comprehensive plans or planning systems addressing the same area will result in less rather than more coordination of land use planning and resource protection and development decisions.

Based on experience, preference with regard to master planning would be for the development of a less comprehensive and duplicative federal plan supplement, which would be specifically coordinated with the Metropolitan Area regional/local plans and planning implementation mechanism.

4 There are at least three areas of activity which could be better addressed by a Federal Plan Supplement for the Mississippi River Corridor than by the existing regional/local planning system: a River related recreational trail and open space element tied to prospective federal funding; a barge fleeting plan; and a federal transportation plan element providing guidance and funding priorities vis-a-vis federal transportation facilities, including the Great River Road and major bridges, road, railroad and airport facilities.

In summation, SLUC supports the adoption of Alternative A with modifications. In our view, the adoption of another separate overall master plan for the River Corridor would be counter-productive. Instead, developing and adopting a three element Federal Plan Supplement addressing recreational facilities, barge fleeting and major transportation facilities would be extremely helpful. In addition, River Corridor planning, protection and use would be aided if the Commission were to sanction use of the existing Metropolitan regional/local land use planning system and provide formal federal input on any modification of the existing planning documents and system as well as project specific reviews. Consistent and sustained review and input on critical plan amendments and project decisions would go a long way toward achieving far more in the realm of coordination than would the adoption of another master plan governing the Corridor. Effective plan implementation is the critical needed ingredient for the management of the River resource.

The second subject of comment relates to governance and implementation. Good planning is frustrated and inconsequential if not effectively implemented. It is in the implementation of the existing planning system where more help is needed. Plan implementation is human and economic resource intensive. Strong, consistent, reasoned, and effective input is absolutely necessary and frequently difficult to provide, in large part because of citizen group and public sector financial limitations and priorities.

For decades, we have misused our rivers and adjacent wetlands. We have used them extensively as sewage treatment facilities, dumping grounds, crop lands and commercial transport arteries. In the 1970s, we started to recognize what we had done and began trying to control and reverse

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3. The MNRRA legislation requires a comprehensive management plan for the corridor.

4. The suggested trail policy is in the open space and trails section of the plan, and a surface water use management plan is proposed in the final plan. A corridor transportation plan is beyond the scope of the MNRRA plan and would duplicate regional transportation plans. A statement was added showing support for the regional transportation planning process.

some of the degradation. We began with the help of tough federal statutory and regulatory requirements addressing point source discharges and with extensive federal and state new sewage treatment facility funding. The combination of regulation and funding was dramatically successful, but it didn't totally solve the problem, so we have moved on to try to address nonpoint source pollution. State agencies, regional governments and counties have now made the nonpoint source pollution problem a statewide issue. In time, we will get agricultural runoff and stormwater management under control, and if we can restore some wetlands in the southern half of the State, the Minnesota River will be returned to the quality level it enjoyed in the early 1900s.

A coordinated and relatively simplistic state/federal unitary regulatory system, implemented gradually over the years, has achieved the desired effect. No new plan was adopted in connection with this effort. Duplication, incompatibility and regulatory conflict were avoided. A simple, federally dictated and state and locally adopted and administered regulatory mechanism produced the improvement with relatively little conflict. Conflict which occurred was resolved by federal statutory and regulatory requirement and Environmental Protection Agency and court intervention. The success of the federal/state water pollution control system is a model, which should be carefully observed and followed with respect to the Mississippi River Corridor program.

Among the critical elements are the following:

- couple regulatory input with funding
- keep regulatory requirements and administration simple and strong
- focus on critical permit issuance decisions and on permit compliance
- use local regulatory authorities as the first line of administration, with state and potential federal backup and provide significant state and federal funding and oversight
- recognize that the overall objectives will be achieved gradually and with a shifting of priorities and focus over time

Statements in the draft MNRRA Plan suggests the possible development of a regulatory system far different than the successful water pollution control mechanism. The implementation of a complex alternative and superior regulatory mechanism could well prove to be enormously expensive and counterproductive spawning controversy, delay, retreat and hostility. At this juncture, and in this area, we have a very mature, well-developed and comprehensive land use and environmental regulatory review system. There is no need for either a new layer or a new system of regulatory control. There is, on the other hand, need for sustained comment on project reviews, funding assistance on impact studies, for example, in connection with River related projects and many other types of specific input in connection with the existing regulatory review

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5. The MNRRA plan does not add another layer or new system of regulation. It supports the other systems.

system. Establishing a new, supervening regulatory role for the National Park Service, the Minnesota DNR or even the Mississippi River Coordinating Commission could be disastrous and counterproductive. SLUC urges the MRCC to work within the existing project review regulatory system and provide funded oversight and other input in connection with project specific reviews. As a River Corridor use and preservation advocate, MRCC would provide an extremely important service. With this assistance, as well as the proposed acquisition of interpretive centers and trail corridors, the use and preservation of the Mississippi River Corridor resource could be dramatically enhanced.

6

Thanks for your consideration of the above.

Very truly yours,

Mark Koegler

Mark Koegler, President
SENSIBLE LAND USE COALITION

MK/co

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6. The plan was revised to stress using the existing regulatory system.

Minnesota Environmental Coalition of Labor and Industry

312 West First Street
Duluth, MN 55802
1-800-642-7620

September 10, 1993

National Park Service
Ms. JoAnn Kyral, Superintendent
Mississippi National River and Recreation Area
175 E. Fifth Street, Suite 418
P.O. Box 41
St. Paul, MN 55101

Dear Superintendent Kyral:

The Minnesota Environmental Coalition of Labor and Industry (MEC) is opposed to the Mississippi National River and Recreation Area (MNRRA) Draft Comprehensive Management Plan and Environmental Impact Statement in its current form. We recognize and appreciate the time spent by the Mississippi River Coordinating Commission (MRCC) in preparing this document. However, this plan does not fulfill the mandate set forth in the federal law (P.L. 100-696). As such, the MEC sets forth the following resolution.

Whereas, the MEC is a unique partnership of labor and business, formed in the spring of 1992, to work together on issues relating to jobs, the environment, and sustainable development.

Whereas, MEC members support achieving the delicate balance between protecting the environment and promoting job stability and economic growth for the citizens of Minnesota.

1 *Whereas*, the draft MNRRA plan fails to adequately define how the MNRRA will balance these needs. As such, the draft plan should not go forward until it has been revised to specifically address those issues put forth in the law.

2 *Whereas*, the draft plan is unnecessarily vague and broad. This vagueness may have serious negative effects on job and economic growth in Minnesota because businesses will be hesitant to invest in an area where many uncertainties exist.

3 *Whereas*, the draft plan suggests that local control will be superseded by unnecessary oversight by the NPS and duplicative or conflicting regulations imposed at the

404

1. The commission and the National Park Service believe that the MNRRA plan addresses the issues put forth in the law.

2. Some specifics were added, but it is a comprehensive policy plan (see response to comment G-2-2).

3. The plan was revised to emphasize an incentives approach to implementation.

federal level. Such action is detrimental to effective policy formulation and implementation by local officials familiar with local concerns.

4 *Whereas,* the draft plan does not define variance nor describe the variance procedure in a manner consistent with existing local ordinances. Confusion arising from these inconsistencies will negatively impact reasonable economic development.

5 *Whereas,* the draft plan does not adequately recognize the integral role transportation along the corridor has in Minnesota's economic success in the world economy.

6 *Whereas,* the draft plan does not adequately provide "policies and programs for the commercial utilization of the Area and its related natural resources . . . as established in the MNRRA."

7 *Whereas,* the draft plan is inconsistent with legislative history by containing policies that go beyond the original intent of the law. These policies create additional levels of bureaucracy and unauthorized powers.

8 *Whereas,* the vagueness of the draft plan raises serious concern that the NPS could extend their authority beyond national parks to impose "administratively initiated" sections of the Code of Federal Regulations (CFR).

9 *Whereas,* the draft plan should be built upon existing local plans and programs.

10 *Whereas* , priority for federal matching funds should be given to completing the already planned trail system.

Therefore, be it resolved that the Minnesota Environmental Coalition of Labor and Industry is clearly opposed to the Mississippi National River and Recreation Area Draft Comprehensive Management Plan and Environmental Impact Statement dated June 1993.

Until and unless the draft plan is revised to clearly resolve these major objections, the plan should NOT be approved.

Robert Rootes
United Steelworkers
Co-Chair

Ann Bothun
Peoples Natural Gas
Co-Chair

Attachment

2

405

4. Land use management would follow state law regarding variances. This was clarified in the final plan.

5. A statement was added to underscore the importance of the transportation system in the corridor.

6. The National Park Service and the commission believe that the plan adequately addresses this requirement.

7. The National Park Service and the commission believe that the plan does not go beyond the intent of the act, nor does it create additional levels of bureaucracy.

8. The final plan was clarified to state that the Code of Federal Regulations under NPS authority only applies to NPS-owned land as stated in the MNRRA legislation.

9. There is a wide variety of community plans and the MNRRA plan is built on these existing plans, using selected elements from each.

10. See response to comment B-12-5.

PARTNERS

MINNESOTA ENVIRONMENTAL COALITION OF LABOR AND INDUSTRY

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American Plastics Council
Amoco Corporation
Ashland Oil
Blandin Paper Company
Boise Cascade Corporation
Building & Construction Trades
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United Paperworkers
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We're Moving
TOWARD A COMMON GOAL
I-494 WAKOTA BRIDGE COALITION
SOUTH ST. PAUL-INVER[illegible]OVE HEIGHTS CHAMBER OF COMMERCE
Representing interests from the communities of Washington and Dakota Counties

September [illegible], 1993

Superintendent JoAnn Kyral
Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418, Box 41
Saint Paul, Minnesota 55101

Dear Superintendent Kyral:

RE: Draft Comprehensive Management Plan and Environmental Impact Statement

The Wakota Bridge Coalition is a group organized to increase the capacity of the highway river crossing at Interstate 494 between the communities of Newport and South St. Paul. This project includes increasing the number of lanes crossing the river by expanding the current bridge structure or adding an additional structure parallel to the existing bridge. There would also be extensive work required on the approaches to the bridge on both sides to accommodate the growth in this part of the Twin Cities metropolitan area.

The bridge crossing is also closely tied to improvements to TH 61 in Newport, between St. Paul Park and the Interstate 494 interchange. These improvements are required to improve regional access on both TH 61 and Interstate 494, to improve local access at the three signalized intersections on TH 61 within Newport, and to address safety concerns within the TH 61 corridor, especially bicycle and pedestrian movements.

1 The Wakota Bridge Coalition requests that the DEIS and the comprehensive management plan acknowledge the need to upgrade these facilities within the MNRRA Corridor and recommend they be specifically included in the final plan. The Interstate 494 bridge is included as a priority project by the Metropolitan Council in its study of major bridge crossings.

2 The Coalition is also concerned about language on page 29, #17, Site Developing Policies, "incorporating scenic parkway road design . . into road reconstruction . . and bridges over the river" and the language contained within Appendix C relating to Bridges . . and Roads. This language would seem to preclude the necessary approach work to an expanded Interstate 494 bridge structure and the improvements required on TH 61. The Coalition strongly opposes any language that would prevent these projects from being developed and implemented within the corridor.

We appreciate your attention to these concerns and would be available to discuss these projects in greater detail.

Sincerely,

Lyle Jacoby

Lyle Jacoby
Chairman, I-494/Wakota Bridge Coalition

P.O. BOX 144 • 633 SOUTH CONCORD STREET • SUITE 304 • SOUTH ST. PAUL, MN 55075 • (612) 451-2266

407

1. Under the general approach of not addressing site-specific issues in the plan, it would not be appropriate to identify specific proposals in the plan. However, statements were added in general support of metropolitan transportation planning, including a specific reference to the Major River Crossing Study.

2. The subject policy in the final plan was amended to address this concern. See response to comment G-30-7.

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association of metropolitan municipalities

Sept. 9, 1993

JoAnn Kyral, Superintendent
Mississippi National River and Recreation Area
175 East Fifth St., Suite 418
St. Paul, Minnesota 55101

Dear Ms. Kyral,

Enclosed are comments adopted by the Association of Metropolitan Municipalities (AMM) regarding the draft Comprehensive Management Plan and Environmental Impact Statement (EIS) for inclusion in the public comment record on the draft plan and EIS.

1 The AMM is concerned about the overall lack of specificity in the draft regarding several areas, including but not limited to impact on residential property within the corridor, the inappropriate reliance on the Metropolitan Council over local plans, and the lack of specifics regarding matters of funding and safety oversight of proposed trails and public use areas within the corridor.

The AMM would, therefore, recommend that the draft be modified with more specific information regarding impacts and financing responsibilities, among other things.

Thank you for this opportunity to comment. Should you wish to discuss the AMM's response further, please do not hesitate to call AMM Director of Legislative Affairs Roger Peterson at the AMM office, 490-3301.

Sincerely,

David M. Childs

David Childs,
President, AMM
Manager, City of Minnetonka

encl.

3490 lexington avenue north, st. paul, minnesota 55126 (612) 490-3301

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1. See response to comment G-2-2.

Comments for the Public Record
Pertaining to the
Draft Comprehensive Management Plan
And
Environmental Impact Statement
for the Mississippi National River and Recreation Area

After a review of the draft Comprehensive Management Plan and Environmental Impact Statement for the Mississippi National River and Recreation Area (MNRRA), the Association of Metropolitan Municipalities would enter the following comments into the public record:

1. The draft is very general and non-specific and therefore, it is hard to determine the actual impact especially on existing residential property.

2 **The plan should be modified with more specificity on the overall impact on residential property within the specified corridor.** It is our understanding that ~~current/existing residential property will not be~~ impacted, will not have to provide additional or changes to plant growth, and will not be prohibited from rebuilding if destroyed by catastrophe. However, vacant land zoned residential will have to meet all setbacks, heights and restrictions concerning riprap and floral plantings. **Intermixing new housing under new regulations with current housing under old regulations may increase unsightliness rather than decrease it as well as creating unequal city standards from house to house. This area of the plan should be reconsidered.**

2. The initial law, and some Mississippi River Coordinating Commission members feel the intent of the plan, was and is to provide local jurisdictions authority and local latitude in control over zoning ~~decisions within the boundary of rules and regulations~~ established by MNRRA. However, the plan continually refers to Metropolitan Council interpretation, control, intervention and decision-making authority over local plans. **This currently exceeds Metropolitan Council authority and thus is inappropriate to be designated by the plan.**

3 The Metropolitan Council is in an extreme state of flux and is being studied under a legislatively created advisory council as well as by several committees of the Legislature. **It would seem more appropriate to vest the decision making with local government as intended**

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2. Impacts to existing residences in the corridor are expected to be minimal or nonexistent. The Environmental Consequences section was revised to clarify this. Impacts on undeveloped residential property would be very difficult to specify beyond what is contained in the document. Individual communities would determine whether the policies in the plan are implemented.

3. There is nothing in the MNRRA plan that exceeds the existing Metropolitan Council authority . There is no intervention or control over local land use decisions proposed for the Metropolitan Council, except for efforts carried out on behalf of the National Park Service to encourage communities to revise their plans to substantially conform to the MNRRA plan. This is similar to what was done under the state critical area program. The final plan was clarified to explain this.

and create a dispute resolution process through the DNR.

3. The plan does spell out, to some degree, standards but has phrases such as "sight from bluff to bluff" or "from one side of the river to the other." There are also questions as to how far the regulations extend, i.e., in Newport the bluff line is the far side of the city boundary and well outside the park definition. The plan should be modified to spell out exactly what distances are to be regulated and where.

4

4. The plan clearly considers barging and its impact on the economy of river communities. However, the plan seems to ignore the existence of other business activities in the various locations along the 72-mile corridor.

Should current non-barging business activities be given the additional latitude to expand that barging has been given?

5

5. The plan discusses a series of trail and public uses within the 72-mile corridor and does indicate that existing residential property will not be forced to provide public trails.

The plan does not discuss the public safety needs or costs that will occur as a result of additional wooded trails and river access, or the control and cost over vegetation management.

6

6. From discussion and reading of the plan, it appears that there will be several jobs created within the National Park Service to oversee this particular park.

The plan does not discuss with specificity where money for parks, trails, maintenance or local oversight (Met Council or others) will come from or what the annual needs might be. At a time when both federal and state governments are attempting to reduce spending and urging local governments to do the same, this plan, if adopted, seems to force a lot of spending by someone.

7

Prepared by: The Association of Metropolitan Municipalities.

410

4. Communities would determine more detailed policies when updating their critical area plans.

5. A statement was added on expansion (see response to comment B-15-3).

6. Because the full extent of the proposed trail system is not known at this time, it is impossible to predict detailed safety needs and costs with any degree of accuracy. Most of what is proposed in the plan is included in existing local plans. Research on existing trails has shown that public safety needs are less than people expected before the trails were built. The Environmental Consequences section was revised to state that there would be additional operational and maintenance needs for local government, but they can not be estimated at this time. If additional details regarding trail proposals were to become known, safety and maintenance considerations would be considered. This would commonly be done by local governments before development decisions are made.

7. The plan states that existing funding sources would be supplemented by an NPS grant program if funded by Congress. As stated in the plan, the actual needs for park acquisition and development can not be quantified at this time, but would be developed within one year of plan approval. Funding for local oversight would also come from an appropriation from Congress, although separate from the acquisition and development program.

MINNESOTA PARKS & TRAILS COUNCIL
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411

September 10, 1993

Superintendent
Mississippi National River and Recreation Area
175 East Fifth Street
Suite 418
Box 41
St. Paul, Minnesota 55101

Re: Draft Comprehensive Management Plan
Environmental Impact Statement - June 1993

Dear Madam Superintendent:

This letter will set forth comments of the Minnesota Parks & Trails Council regarding the Draft Comprehensive Management Plan Environmental Impact Statement - June 1993 ("Draft Plan").

Minnesota Parks & Trails Council is a nonprofit organization that traces its origins back to 1954. The Council actively supports the development, maintenance and operation of parks and trails in the state of Minnesota, through its some 700 individual members, board of directors and full time executive director. The Council has been actively involved over the years in many park and trail projects, including Afton State Park and William O'Brien State Park on the St. Croix River. and Fort Snelling State Park on the Minnesota and Mississippi Rivers.

When the Draft Plan became available, the Council's board of directors appointed an ad hoc committee to review and comment on the Draft Plan. The committee is comprised of Michael Bosanko, Peggy Lynch, Samuel Morgan, Kiki Sonnen and myself, all of whom are members of the board of directors of the Council.

Enabling Law and Process

We have reviewed Title VII of Public Law 100-696, the enabling legislation for the Mississippi National River and Recreation Area and the Commission (the "Law"). We note that one of the purposes of the Law is:

> "To protect, preserve and enhance the significant values of the waters and land of the Mississippi River Corridor within the St. Paul-Minneapolis Metropolitan Area." (Emphasis added.)

The Law provides that the Commission shall assist the Secretary, the State of Minnesota and local units of government in developing the following:

> "(1) Policies and programs for the preservation and enhancement of the environmental values of the Area. (Emphasis added.)
>
> "(2) Policies and programs for enhanced public outdoor recreation opportunities in the Area.
>
> "(3) Policies and programs for the conservation and protection of the scenic, historical, cultural, natural and scientific values of the Area. (Emphasis added.)
>
> "(4) Policies and programs for the commercial utilization of the Area and its related natural resources, consistent with the protection of the values for which the Area is established as the Mississippi National River and Recreation Area." (Emphasis added.)

1 It is apparent that the "values for which the Area is established" are those set forth above. Yet, in our opinion, the Draft Plan fails to adequately focus on those goals and values.

1. The National Park Service and commission believe it does focus on the values identified by Congress.

Section 703(j) requires, with respect to development of the Plan that, among other things, the Commission consult with interested conservation organizations, and that the Commission shall conduct public hearings for the purposes of providing interested parties with the opportunity to testify with respect to matters to be addressed in the Plan. It is our opinion that the Draft Plan was prepared without adequate consultation with conservation organizations in connection with its preparation, and it is our concern that the public hearings that were conducted this summer came at a time when testimony of interested persons will have less impact than it would have had if the hearings had been conducted earlier in the process of preparing a Plan. We believe there are significant matters which are not adequately addressed in the Draft Plan. We hope the Commission will be willing to make substantive changes in the Draft Plan notwithstanding the relatively short period it has established to summarize and consider comments before adopting a final Plan. (We understand a one week period to summarize comments has been established, and that a tentative Commission meeting has been established for October 6, 1993.)

2

Section 703(i) sets a nonexclusive list of matters which the Plan shall include. It provides that "a unified comprehensive plan for the Area" shall be presented. The four enumerated matters to be included in the Plan are:

(1) A program for management of existing and future land and water use.

(2) A program providing for coordinated implementation and administration of the Plan with proposed assignment of responsibilities to the appropriate governmental unit at the federal, state, regional and local levels.

413

2. The MNRRA planning process included extensive opportunities for public involvement throughout the project. These are summarized in the final environmental impact statement.

Superintendent
Mississippi National River
and Recreation Area
September 10, 1993
Page 4

(3) A coordination and consistency component which details the ways in which local, state and federal programs and policies may best be coordinated to promote the purposes of the Law.

(4) A program for the coordination and consolidation, to the extent feasible, of permits that may be required by federal, state and local agencies having jurisdiction over land and waters in the Area.

The second item requires, among other things, a financial plan, and that the Plan include a description of how the goals and policies of the management plan will be compatible with the existing channel maintenance program on the Mississippi River, and the existing federal, state, regional and local programs and goals on the Minnesota and St. Croix Rivers.

Recommendation that Alternative B be Adopted

414 3 Our Council's Board of Directors has unanimously endorsed Alternative B to the Draft Plan. We found Alternative B to be more compatible with the purposes of the Law, and what we view as the long term interests of the public. We note that it would emphasize "increased open space preservation, more rigorous riverfront policies, greater shoreline restoration...." Also, it would contemplate "a more extensive land acquisition program than in any alternative" and "alterations of bluffs, shorelines, wet lands or the flood plain would be prohibited." (Page 94.) It contemplates a stronger role for the National Park Service, which we believe can be beneficial. We urge the Commission to adopt Alternative B, and to take the time necessary to do so.

3. Some elements of alternative B were added to the plan. The commission and the National Park Service feel the final plan meets the intent of the law and reflects broad public input received during the planning process.

Comments Regarding Specific Provisions of the Draft Plan

Following are several comments of our committee regarding specific aspects of the Draft Plan which we feel are insufficiently covered, which we take exception, or which could be rewritten in more understandable form.

4 Format of Draft Plan. We recommend that the Draft Plan be reorganized into a format which follows the four general Plan requirements described above, and their sub-headings, as set forth in Section 703(i) of the Law. Although most of these matters are apparently addressed in one form or another in the Draft Plan, one has to "dig" to find responses. For example, almost as an afterthought, three sentences on water quality are included on page 84 in the proposed response to Section 703(i)(2)(D) of the Law. They refer to another section of the Draft Plan, but there is not much discussion in that section, either.

We presume the Commission has compiled substantial data regarding existing programs affecting the Area that are under the jurisdiction of the federal, state and local governments and agencies thereof. Appendix H cites several prior studies. It would be helpful to an understanding of the Plan to include more background information.

5 It is also our general observation that the Draft Plan, with the exception of the proposal for a Harriet Island Interpretive Center and proposed interpretive programs, is lacking in specific recommendations, apparently anticipating that these will be developed by the Commission at a later date. We would prefer to see more specific recommendations developed and presented at this time.

415

4. The plan includes sections required by MNRRA law, other federal laws, and NPS guidelines. It is best organized to comply with all of these.

5. It is a comprehensive policy plan (see responses to comments G-2-2, G-17-9, and G-22-1).

Water Quality. The Law requires that the Plan include a program "with proposed assignment of responsibilities to the appropriate governmental unit at the federal, state, regional and local levels, including ... the provisions of the Clean Water Act and the Safe Drinking Water Act ...." On page 84, it is stated that: "The provisions that pertain to the surface waters would continue to be implemented by existing federal, state and local agencies, with oversight by the MNRRA commission to ensure that water quality standards are met and improvement in overall water quality in the corridor is achieved." There is a mention on page 39 that the Minnesota Pollution Control Agency would have a lead role in this effort. No timetable is set for achieving a water quality that is "swimmable and fishable through the entire 72-mile link." (Does "fishable" mean that people can eat fish from the River without limitation?) In our opinion, this does not sufficiently deal with the very important issue of clean water. Clean water is fundamental to the environmental and recreational values of the Mississippi River. We recommend that the Plan include the Commission's assessment of how well these agencies are administering clean water laws and regulations, recommend dates for achieving water quality compliance, and recommend a more specific role for National Park Service personnel to monitor compliance. (It is our observation that it has been necessary for citizen groups to play a monitoring role.) Because of the importance of this aspect, we recommend that the discussion of water quality matters and their administration be covered in a single section. (We note a typographical error in the reference to the Law on page 84. It should be section 703(i)(2)(D).)

2

Harriet Island Interpretive Center. The Draft Plan, although it lacks specifics in most respects, specifically provides for the "St. Paul/Harriet Island Interpretive/Headquarters facility." The map on page 63 sets forth existing and proposed interpretive and educational facilities, including Historic Ft. Snelling, a proposed new

6. Additional emphasis on clean water was incorporated in the visions and in the Natural Resources Management section, but the comprehensive management plan is not a detailed water quality implementation plan for the corridor.

visitors center at Ft. Snelling State Park, the visitors center at Minnesota Valley National Wildlife Refuge, the Science Museum of Minnesota and many others. (The multimillion dollar Minnesota Historical Society building in St. Paul is not included on the map.) The Draft Plan states that the interpretive proposal "capitalized on the excellent interpretive work already being done in the corridor and seeks to fill the interpretive gaps and offer coordination of existing interpretive facilities, activities, and programs." (Page 62.) On page 58 it is stated that: "To accomplish their functions, the two central interpretive centers for the corridor would require sufficient critical mass to attract visitors [in competition with other attractions which are listed by way of example]." Given the existing interpretive facilities in the corridor, the need for the proposed Harriet Island facility (which is estimated to cost about $8,347,000, or about $440 per square foot) is not demonstrated, and we would prefer a different assignment of priorities for limited financial resources. The National Park Service can, in our opinion, carry out an interpretive mission without a new, 8 million dollar building, (at locations other than centers owned and operated by the Service (including aboard sightseeing boats as is done at Taylors Falls on the St. Croix River). A "bricks and mortar" image for the National Park Service seems inappropriate. (Mr. Morgan of our committee would favor an attractive, but less costly, visitors center on Harriet Island to complement plans for development of the riverfront in downtown St. Paul, and Ms. Lynch would favor a less costly interpretive center at a St. Paul site, for which an alternative location such as the historic Union Depot might be considered.)

7

Open Space and Parks. Our Council is particularly interested in the preservation of open spaces within the corridor, and it is our opinion that the protection of environmental values and enhancement of recreational use of the corridor requires public ownership of more open space

8

417

7. In order to interpret the themes identified in the draft plan, many interpretive techniques have been proposed, including the use of interpretive centers. The proposed NPS and cooperative interpretive centers would provide a place for visitors to begin their exploration of the corridor, view exhibits and audiovisual learning materials, and obtain basic visitor services. There would also be places where property owners or others who have questions about the Mississippi National River and Recreation Area can go for answers. Partnerships are emphasized in the draft as one way to get the most value out of these centers. The plan was revised to indicate that figures for interpretive center costs are very preliminary, and the details on costs were moved to the appendix.

8. Additional emphasis on open space protection was added.

within the corridor, and particularly, but certainly not limited to, those areas that are ecologically sensitive or contain unique resources. The Draft Plan's open space and trails concept, as set forth on page 30, is quite low key and concludes that "more coordination would be necessary to further develop the open space and trails concept." As with the clean water issue, it is our opinion that the open space and trails concept is fundamental to the Plan, and that the final Plan should take a more pro-active stance with respect to the concept and its implementation.

9

We are confronted with urban sprawl, and development pressures on remaining open spaces are driving up land values. Governments at all levels are operating under severe budgetary constraints. The "national" aspect of the Plan is the fact that the Mississippi is a major river of national significance, and the Law invites a proposal for preservation of natural resources. We are of the opinion that some assessment of the phenomenon of rising real estate values with urban development pressures should be included in the Plan, together with some estimates of the costs of acquiring open spaces, and the needs for federal assistance contemplated by the Law.

10

Our Council, together with the Metropolitan Council Parks and Open Spaces Committee, the Washington County Park Planning Committee and others, has recently recommended the acquisition of a substantial portion of Grey Cloud Island in the corridor for a park, and we would welcome the endorsement of the Commission for that proposal (together with a recommendation for federal financial assistance). We believe that the development of a park is consistent with ongoing commercial activities by the Shiely Company on portions of the island. We suggest that Grey Cloud Island and all of the regional parks in the corridor should be specifically referenced in the text of the proposed Plan, whatever alternative is adopted.

11

418

9. Emphasis was added, but local government would be the key to implementing the open space and trails concept.

10. The cost of open space acquisition would be estimated in follow-up work with local communities as described in the plan implementation section of the MNRRA plan.

11. A reference to Grey Cloud Island was added to the open space land acquisition discussion in the final plan.

12

Management. We have concerns about overlapping management and regulation, and the Draft Plan does not, in our opinion, adequately discuss the disadvantages of management by multiple governmental entities. We strongly urge the Commission to consider the adoption of recommendations that would eliminate unnecessary duplication (and also focus accountability for management). The Commission could look to management of the Upper and Lower St. Croix River Areas. We understand, for example, that at least one municipality on that river has not yet adopted zoning ordinances compatible with the Wild and Scenic River requirements more than 25 years after designation of the St. Croix River as a Wild and Scenic River.

Recommendation that Portions of Alternative B be Adopted, If Alternative B Is Not Adopted in Its Entirety

13

We strongly endorse Alternative B. If the Commission nevertheless decides to adopt the Draft Plan, rather than Alternative B, we urge the substitution in the Draft Plan of as many provisions of Alternative B as possible. In this regard, we specifically note the Open Space and Trails section on pages 30-34, and recommend substitution of Alternative B, pages 95-96. For the Commercial Navigation selection on pages 34-38, we recommend substitution of Alternative B, page 96. We recommend the National Park Service have a monitoring role with respect to compliance with barge fleeting rules. On page 51, Visitor Use Management--Proposed Policies and Actions, add a number (6) "Commercial navigation must be included in any study of carrying capacity of surface water use." And add from Alternative B, page 98, "More liberal use of no-wake zones would also be encouraged to provide additional quiet zones in the corridor and protect shorelines. Tour boats and other visitor-oriented commercial enterprises would also be promoted. Conflicts between uses

14

15

419

12. Partnerships are a necessary part of the plan based on the letter and intent of the MNRRA legislation.

13. Some elements of alternative B were added to the proposed plan, but there was not a complete replacement. It is felt that the proposed plan best fits the intent of Congress and the preponderance of public input.

14. Commercial navigation should not be addressed under visitor use. However, a surface water use management plan is proposed in the final plan and it would address commercial navigation and river system capacity.

15. This idea is in the plan. No-wake zones would be further assessed in the surface water use management plan referenced above.

would be settled in favor of those less damaging to the environment."

16 On pages 75-83, "Plan Implementation," we believe the provision of Alternative B giving the National Park Service more direct authority to implement resource management, visitor use, and development components of the comprehensive management plan is preferable, and that time lines should be set for when local plans must be completed. Furthermore, some means of enforcement for those communities that are not in compliance will be necessary.

17 With respect to "Strategies for Streamlining the Regulatory Structure" on pages 81-83, in clause (3) on page 82 we think it is important that "a representative from the environmental community" be required as a member of the "small task force." (Greater involvement of representatives of the environmental community would be desirable with respect to all further activities of the Commission.)

We also recommend the addition from Alternative B of the section entitled "Coordination and Consistency" on pages 99-100 with the deletion of "or the Commission" from the next to last bullet, and the deletion of "and the Commission" from the last bullet so that the regulatory authority and management leadership and oversight is focused in the National Park Service.

420

Conclusion

We realize the Commission has an exceedingly complex assignment, but also recognize that the Commission is charged with a job of great importance to the present and future generations and their ability to enjoy a unique and magnificent resource. Opportunities exist at this time to protect and preserve our resources that may never exist again.

16. This concept is not supported by the commission or corridor communities, which are key to successful MNRRA plan implementation. The commission and the National Park Service believe that the final plan best fits the intent of the MNRRA legislation and the desires of corridor communities that would be the focus of implementation under any scenario.

17. The statement was revised to address this comment. Interested groups would have the opportunity to participate in the process.

We would welcome an opportunity to appear before the Commission to discuss any of the foregoing points in more detail.

Very truly yours,

Michael Prichard
President

MP:jw

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COMMENTS

VOYAGEURS REGION *National Park Assn*

Suite 302C
119 N. 4th St.
Minneapolis, MN 55401
612/333-5424

September 10, 1993

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Mississippi National River and Recreation Area
175 E. Fifth Street, Suite 418
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STAFF
Jennifer R. S. Hunt, *Executive Director*

Dear Superintendent Kyral:

Voyageurs Region National Park Association (VRNPA) appreciates the opportunity to comment on the Draft Comprehensive Management Plan Environmental Impact Statement (Draft EIS) for the Mississippi National River and Recreation Area. We appreciate the work and effort that the National Park Service and committed citizens have put into this effort. We only have one Mississippi River and we are glad the federal government has committed to working with Minnesotans to restore and care for it.

Overall, VRNPA supports the proposed plan. Our exceptions to the proposed plan have been listed below, by section.

Section: Land and Water Use

We strongly support the overall concepts in this section with the exception of how to approach current inconsistent river area use. We encourage you to incorporate a plan to create incentives for inconsistent river area users to move their business. If no incentives can be found, a mandate for those businesses to contribute to the restoration of the river area bordering their business', should be applied. 1

On page 20, you write that resource protection would be the primary determining factor in case of a conflict. 'Resource' was defined as being either natural, cultural or economic. We believe that the resources should be prioritized, with natural resource protection receiving the highest priority, with cultural protection second and economic third. We cannot over emphasize our belief that economic development in the corridor should be consistent with river use with many incentives 2

Established as a 501(c)(3) non-profit corporation to preserve, encourage and promote the natural, recreational and historical resources of Voyageurs National Park in accordance with the Park's enabling legislation; and in addition, to be a friend to other National Park Service-managed lands in the region.

printed on re.

RESPONSES

1. The idea of purchasing inconsistent uses and offering incentives for relocation has drawn intense opposition from business and industry interests. The plan does specify shoreline treatments and beautification efforts that should be undertaken. Additional language about existing industry cleanup and neighborhood compatibility were added, although the real power to achieve improvement lies with the local governments because of the generally advisory nature of the MNRRA plan.

2. The National Park Service does not have legal authority to set priorities on the resources listed in the law.

for those business to take an active role in restoring the riverfront in their area.

3 On page 23, please revise the last sentence on the page to read "The plan would also allow businesses and industries in the corridor to expand existing facilities if the expansion is consistent with natural resource protection and site development policies **add to the natural improvement of the river.**"

4 Please add a sentence to page 29, point number 11, at the end of that point to read "**No new corridors are to be developed for river crossings in the MNRRA.**"

It is unclear as to the priorities for implementing this Draft EIS. We strongly encourage the NPS to move first to implementing the Land Use/Riverfront Use recommendations. Given the NPS's commitment to working with all levels of governments connected to the river and the existence of strong shoreline protection guidelines, a plan to follow up on this could be drafted and ready for implementation under a reasonable timeline.

Section: Barge Fleeting Areas

5 Please change the word in point number 2 on page 37 from "preferably next to" to "only in".

6 Please add to point number 3 on page 37 "**Assess the need to locate or relocate a new barge fleeting area and** evaluate the potential for bank erosion before making decisions to locate new (or relocate existing) barge fleeting areas. **Identification and mapping of all proposed fleeting sites in the corridor will be planned, before any new areas are considered.** "

7 Please change Page 41, point number 15 to read as follows, "**Develop spill prevention and response plans in cooperation with other responsible government agencies by the fifth year of the approval of this plan. This should include all potential sources, such as point sources and pipelines, railroads, barge traffic and other transportation modes. Until the spill prevention and response plan is approved, identify and enforce responsible government agency action to regularly monitor fleeting areas for spills and clean-ups.**"

Section: Open Space and Trails

The extent of open space and trails along the MNRRA river corridor is impressive. Action must be taken to ensure that these areas are protected and that sites for future trails are selected. The use of open spaces and trails is especially important in

8 an urban setting where such areas are rare. The NPS should take an active role in

423

3. This policy was revised, but it would be inappropriate to focus resource protection on one category of corridor resources.

4. See response to comment G-15-16.

5. "Preferably" was deleted. "To the extent possible" was substituted.

6. This is a concept that was included in alternative B, which was not selected for the proposed plan because it was not considered necessary under existing forecasts, and it would restrict the activities of the industry too much. This concept was strongly opposed by business and industry representatives on the commission and associated commercial navigation interest groups. However, a surface water use management plan, which would include mapping of proposed fleeting sites, is proposed in the final plan as a priority during MNRRA plan implementation.

7. In most cases, time frames should not be specified in comprehensive management plans. Spill prevention and response plans are supported in the MNRRA plan.

8. The National Park Service would have an active role in promoting implementation of the open space and trail concept and policies in the plan.

promoting open spaces and trails along the river corridor for recreational purposes, as well as creating a protective buffer along the river. The Park Service's proposal of 50% funding for trail areas is an important part of this concept and should be actively pursued. Once the trail system is established, the NPS should continue providing assistance to local authorities in upkeep and interpretive programs.

Section: Resources Management

We are encouraged that the NPS will serve as coordinator of resource related issues by providing historic preservation input, technical assistance, maintain the GIS for the area, and serve as a central clearing house of information about the MNRRA corridor.

Natural Resources

9 The NPS should develop partnership relationships with the lead state and federal agencies in charge of particular areas (Corps of Engineers, Fish and Wildlife service, Minnesota DNR, Minnesota Pollution Control Agency). The NPS should act as a liaison between these different agencies as well as between agencies and private citizens.

10 The "Proposed Policies and Actions" (pages 40-41) reflect a need to cooperate with the affected agencies and citizens. Some points, however, are nearly identical (1 and 13, 6 and 14, 11 and 15).

Cultural Resources

11 The NPS should lend as much assistance as possible in preserving the cultural resources in the area, and ensure that the full history of the corridor is reflected, particularly Native American. A complete inventory should be undertaken as suggested on page 47. The "Proposed Policies and Actions" provide an excellent starting point for developing a cultural resources agenda.

Economic Resources

We agree with the NPS in stating that "an economic resource inventory should be preceded by more analysis, agreement on the definition of 'economic resource,' and a comprehensive identification of what should be included in the inventory." (Page 47). The plan currently has no concrete statement on what should be done to balance economic interests versus protection of natural resources. Analysis of economic interests versus environmental protection should be undertaken, with the goal of protecting natural resources.

The "Proposed Policies and Actions" section (page 48) was difficult to understand. At least four points conflict with the remaining points, as well as other goals discussed

424

9. NPS would develop partnerships with these agencies as suggested

10. They are related but include subtle and important differences.

11. Emphasis was added on Native Americans in the Cultural Resource Management section and Visitor Use and Interpretation sections of the final plan.

in the management plan. Those four points were: "continue existing land uses in the corridor," "allow redevelopment and expansion of corridor businesses," "interpret the working river," and "continue barge fleeting areas and allow for some expansion of fleeting areas." The first three of these points are vague in their meaning and the fourth, "barge fleeting," does not discuss environmental impacts.

12 Given the prevalence of spills when loading and unloading barges, planning to eliminate this environmental threat should be addressed in this plan.

Recreation Research

The NPS should continue its efforts in collecting information on low-impact recreation resource needs in the MNRRA. This work would complement current visitor use and interpretive programs, attracting more people to the corridor, and give the area more exposure.

Section: Visitor Use and Interpretation

The river corridor provides numerous opportunities for recreation and education. The NPS should take a lead role in promoting these activities and ensuring that safe river-related activities are possible in the years to come. We are encouraged by the role the NPS sees itself playing in this: "direct involvement through interpretive and educational programs, orientation to available services, education for low-impact recreation, impact monitoring marketing research, and interpretive training for visitor contact personnel." The NPS should emphasize its role as a lead agency and as the agency which will foster partnerships for interpretive experiences.

425

VRNPA supports the NPS's "visions" for interpretive and educational activities (page 52). However, we do not support the planned interpretive center on Harriet Island in St. Paul. This $9.9 million facility (not including audiovisual media design, equipment and production costs; page 85) seems overwhelming in a time when our federal government is looking for ways to cut expenditures. Our concern with this facility is its cost, whether the NPS will be able to staff the facility to the extent that makes it worth visiting, and the lack of a needs assessment justifying the size, expense and location.

13

We agree that the headquarters should be in St. Paul. Given the available office office space in downtown St. Paul, the NPS should look into acquiring a preexisting building for location of its headquarters and interpretive center. The St. Croix NPS units have two excellent examples of taking advantage of existing office space. Interpretation is important but we believe $9 million can go a long way toward implementing this plan's river restoration recommendations in addition to interpretation.

14 Cooperative ventures in interpretative programs should be investigated. Three potential sites are: the Minnesota History Center, the new Children's Museum, and

4

12. Spill prevention is supported in policy 15 under the air and water component of the Natural Resources Management section of the plan.

13. Locating a center in existing office space in downtown St. Paul could offer cost advantages; however, it would not provide the same access to river-related resources on the south side of the river, such as the parkland and tour boat operations that are available at Harriet Island. The total cost of the facility is a rough estimate at this time. More detailed cost estimates would be developed during project design. The detail of the cost estimate was moved to an appendix in the plan to emphasize its preliminary nature.

14. Cooperative interpretive activities and centers are stressed in the plan.

the Science Museum. Two of these locations are relatively new (Minnesota History Center and soon-to-be-built Children's Museum), and would provide modern facilities for program/interpretive work.

Interpretation, Education, and Visitor Services

We are encouraged that the NPS would like to provide a broad range of experiences for visitors (page 53). The eight themes highlighted on pages 53-56 are good ideas for conveying the message to the public. Whenever possible, the NPS should use its partnerships to implement these programs. The programs of orientation, interpretation, coordination, and environmental and heritage education activities (pages 56-57) should be conducted in association with other agencies. This is an excellent use of the partnership theme emphasized in this draft EIS.

National Park Service Interpretive facilities

The draft EIS recognizes that the current facilities along the corridor are fragmented and, in some locations, deteriorating. The NPS should place primary emphasis upon upgrading the facilities through its partnership work, when feasible. In addition, the NPS should create a cohesive network of interpretive facilities. The four general functions (page 57) are good goals to maintain for the corridor. The four specific functions of the NPS also are good goals to have, as well as the roles that the other partners would play (page 58).

Section: General Development

426

15 As noted above, we question the need for a $9.9 million facility on Harriet Island. Also the NPS should reconsider the Washburn/Crosby complex as the location for the Minneapolis facility. This may have been a suitable location prior to its near destruction by fire, but its viability is now questionable. There are numerous other historic buildings located within the St. Anthony Falls area that would be suitable for an interpretive center and would not cost as much to rehabilitate. The complex, at best, could be maintained as a historic site in its current form, with interpretive information posted around the building for people to read.

Plans for developing the cooperative centers in Hastings and at the Coon Rapids dam and for the associated centers as they are recognized continue to reflect the draft EIS's cooperative theme. We underscore the need to get commitments from the cooperating agencies in developing interpretive centers. The centers' success will rely in part upon the support of the local community.

Park Service Operations

16 We hope that the NPS has long-term assurances to increase its staffing before these ambitious program goals are implemented.

15. The Washburn/Crosby complex is a national historic landmark, and it is much larger than just the portion that burned. It was identified as the best site through extensive discussions with interpretive partners in the area. It must be viewed in the context of a vision of major rehabilitation for the waterfront in this area, which is planned by the city of Minneapolis. This includes proposals for Mill Ruins Park, the Heritage Trail, and major concepts for rehabilitating and adaptively using the Washburn/Crosby complex and its immediate environs. The cost of stabilizing and maintaining the complex without adaptive reuse would be prohibitive. The National Park Service would not commit to move into the complex until it is rehabilitated and occupied with a mix of compatible uses and until more planning is completed. If the right combination of uses are assembled and a portion of the building that is in better shape is used, the cost to locate the interpretive center in the complex might not exceed the costs to rehabilitate other historic buildings in the area. For purposes of this plan it was estimated at new construction rates. Final costs may be higher or lower than this estimate. This discussion was added to the final plan.

16. The National Park Service would increase staff if funding is secured. This generally occurs in new areas over a period of years as needs increase and funding becomes available though annual congressional appropriations.

Plan Implementation

In its discussion from pages 75-87 the NPS appears able to carry out the requirements of the MNRRA legislation. The levels of federal, state and local government should be coordinated to help preserve and protect the corridor. We are encouraged by the Park Service's recognition of the need for coordination and consistency among all of these public agencies. Streamlining the regulatory structure sounds like a good idea on paper, but it should not come at the expense of the corridor's natural resources.

Thank you for the opportunity to comment on this Draft EIS. We look forward to working with the NPS as this plan moves forward.

Sincerely,

Jennifer R. S. Hunt
Executive Director
Voyageurs Region National Park Association

427

Urban Environmental
Education Coalition
c/o 2529 13th Ave. So.
Minneapolis, MN 55404
September 28, 1993

Superintendent
Mississippi National River and Recreation Area (MNRRA)
175 E. 5th St., Suite 418, Box 41
St. Paul, MN 55101

re: Draft Comprehensive Management Plan for MNRRA

Dear Superintendent:

The Urban Environmental Education Coalition (UEEC) is a network of individuals and organizations devoted to environmental education in our urban communities. We are committed to a vision of a healthful and ecologically sustainable urban environment.

UEEC strongly endorses the Alternative B form of the MNRRA plan. We believe that a focus on environmental education coupled with a coordinated strategy of pollution prevention and natural resource protection activities would place MNRRA in an appropriate and strategic position.

428

1 MNRRA can be a key tool for learning about the interdependency of people and environment. MNRRA staff should take an active role in teaching about what importance the river has for people, how people impact the river, and how we can restore the river to a healthful state. MNRRA staff should be directly involved in restoration activities, and should coordinate citizen involvement in the process. In addition, outstanding point and non-point pollution problems must be addressed, and corrective actions pursued. Knowledge of problems without action teaches the wrong lesson.

There is a crying need for education that teaches us about our place in the natural world. The Mississippi River is the central natural feature describing our cities, and it is the reason our cities exist. It should be a place where we learn how to care for nature, and where we learn that by caring for nature, we are caring for ourselves in an essential and primary way.

The establishment of MNRRA gives great hope and promise for the future of our river cities. The Urban Environmental Education Coalition welcomes MNRRA and believes that its great promise can be fulfilled by making environmental education its focal point and supporting that mission with action.

Sincerely,

Jeff Roy
for UEEC

1. The MNRRA plan supports these objectives.

Over 600 members in:
MINNESOTA: PINE, CHISAGO & WASHINGTON COUNTIES & THE CITY OF HASTINGS
WISCONSIN: BURNETT, POLK, St.CROIX & PIERCE COUNTIES

SIERRA CLUB
ST. CROIX VALLEY INTERSTATE GROUP

Audrey Halverson
W12489-820th Avenue
River Falls, WI 54022

October 12, 1993

National Park Service
175 East 5th Street
Suite 418 Box 41
St. Paul, MN 55101

Sirs: Subject: Mississippi River protection

At the October 11th meeting, the Executive Committee of Sierra Club's St. Croix Valley Group voted that the Mississippi River's water quality and scenic properties should be protected but at the same time the River should remain a working river that includes commercial transportation and river valley commerce.

429

1 Part of the Mississippi's "work" is to provide clean water for recreational fishing, bio diversity, boating and human consumption down stream. Therefore other "work" such as commerce should not be allowed to degrade the water quality.

We hope that both these requirements will be met by the Mississippi National River and Recreation draft plan.

Please send a copy of the draft plan.

Sincerely,

Audrey Halverson

Audrey Halverson, Vice Chair

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1. A statement regarding clean water as a high priority was added.

A RESOLUTION TO MAINTAIN ECONOMIC AND ENVIRONMENTAL VITALITY IN THE MISSISSIPPI RIVER CORRIDOR THROUGH BALANCED PUBLIC POLICY

Whereas the Mississippi River Coordinating Commission is drafting a report to evaluate and guide future public policy in the Mississippi River Corridor;

Whereas this report will be submitted to the Secretary of the Interior and will directly affect those who work and live near the Mississippi River;

Whereas it is crucial that the report maintain the current balance of cultural, environmental and economic resources;

Whereas the draft report clearly states that local management of the River Corridor has preserved the river in good condition for over 140 years;

Whereas thousands of homeowners live along the Mississippi river;

Whereas homeowners who live along the river should not be burdened with additional regulation or permitting from another layer of government in the River Corridor;

Whereas an appeals process and other issues should be clearly spelled out in the Plan;

Whereas thousands of businesses and over 100,000 jobs depend on the Mississippi River;

Whereas control of the river should continue to rest with local units of government with input and review from outside agencies;

Whereas the Mississippi River Corridor can and must maintain economic and environmental vitality side-by-side to thrive;

430

1 **Therefore; be it resolved that a coalition of citizens, businesses and homeowners requests that the Mississippi River Coordinating Commission continue to balance the needs of the community and the environment. These are compatible goals and in fact one depends upon the other for a productive Mississippi River Corridor.**

I/We support Minnesotans for the Mississippi and a balanced approach to the Mississippi River Corridor.

PLEASE PRINT

Name DENNIS L. PETTER Title _____ Date 9/7/93

Organization (if representing organization) _____

Address 14200 BOGERS DR NW City ANOKA Zip 55303

Telephone number (612) 427-1467

Please return to: Minnesotans for the Mississippi, 3001 University Avenue, S.E., Minneapolis MN 55414.

1. The MNRRA plan does this.

The following people also sent in the attached resolution from Minnesotan's for the Mississippi:

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ST. PAUL MN 55107

HELEN & KEITH GRAHAM
705 BRADFORD AVE
CHAMPLIN MN 55316

RICHARD & MARGARET GATES
6668 EAST RIVER RD.
FRIDLEY MN 55432

KATHRYN MILLER
3915 E. 26TH ST.
MINNEAPOLIS MN 55406-1858

JEFFREY WICKEN
1700 WEST LANE
ANOKA MN 55303

JOE MAY
10533 W. RIVER ROAD
BROOKLYN PARK MN 55443

WILLIAM & MARY D'AMOUR
7118 WILLOW LANE NORTH
BROOKLYN CENTER MN 55430

JOHN SWANBERG
4020 115TH AVE NW
COON RAPIDS MN 55433

ELIZABETH STREGE
101 W. RIVER PKWY
CHAMPLIN MN 55316

C.E. MARTINSON
7650 ALDEN WAY
FRIDLEY MN 55432

SUSAN NAHSON
7720 MISSISSIPPI LANE NORTH
BROOKLYN PARK MN 55444

STEVE SCHMIDT
THE RIVER CLUB
830 BELANGER DRIVE
ANOKA MN 55303

JAN & STEVE JORDAN
6640 W. RIVER RD
BROOKLYN CENTER MN 55430

ROGER ROELFS
150 TALMADGE WAY
FRIDLEY MN 55432

DORIS LEWIS
740 BENTON ST.
ANOKA MN 55303

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COMMENTS

RESPONSES

GEORGE & GERTRUDE MCCUTCHEN
2344 SEABURY AVE.
MINNEAPOLIS MN 55406

A.M. LARSON
8649 MATTSON BROOKLANE
BROOKLYN PARK MN 55444

ERLING & DONNA DOKKEN
3568 MISSISSIPPI DR. NW
COON RAPIDS MN 55433

RICHARD & JOYCE STORLA
7548 ALDEN WAY N.E.
FRIDLEY MN 55432

MICHAEL SCHMIDT
505 WEST RIVER PKWY
CHAMPLIN MN 55316

MARY JOE & BILL KINNEY
4060 115TH AVE NW
COON RAPIDS MN 55433

JOHN & TERRI BIRRENKOTT
1262 BENTON ST.
ANOKA MN 55303

D. KLESCEWSKI
11408 MISSISSIPPI DR.
CHAMPLIN MN 55316

LELA HOLMGREN
8001 RIVERVIEW TERRACE N.E.
FRIDLEY MN 55432

LARRY BADEN
670 BENTON ST.
ANOKA MN 55303

JEFF WEAVER
314 RICE ST.
ANOKA MN 55303

DAN & LINDA KARST
7224 RIVER SHORE LANE
CHAMPLIN MN 55316

LEE & KAREN CARLSON
840 RIVER LANE
ANOKA MN 55303

ED RAFEL
7540 ALDEN WAY
FRIDLEY MN 55432

STEVE & JULIE BEGICH
10750 MISSISSIPPI BLVD
COON RAPIDS MN 55433

H.E. GROSSHEIM
1120 BENTON ST.
ANOKA MN 55303

TOM VANSLOUN
3590 MISSISSIPPI DR. NW
COON RAPIDS MN 55433

MARY G. & JAMES WENNELUND
1321 OAKWOOD DR.
ANOKA MN 55303

BOB & PAT CHUPUEDIA
10808 ZIEGLER DR.
BROOKLYN PARK MN 55443

ABBAS & SUSAN TABIBI
1709 WEST LANE
ANOKA MN 55303

12 October 1993

Joann M. Kyral
MNRRA
175 East 5th St. Suite 418
St. Paul, Mn 55101

Dear Joann,

The Neighborhood Revitalization Program currently underway in Minneapolis is about neighborhoods planning for the future of their respective communities. Information has been enclosed to give you a broader "mission" perspective of the NRP/CARE.

The suggestion I wish to make regards the interrelationship between MNRRA planning and the planning efforts coming out of MPLS. neighborhoods presently in their NRP process; particularly those neighborhoods who share the vision for an enhanced and protected Mississippi River Corridor. With NRP, neighborhoods in Minneapolis are given a coordinated voice in which to micro-manage their planning efforts with city, county and state agencies. The Mississippi Corridor Neighborhood Coalition and other organizations are also actively involving residents in MNRRA related planning/consensus activities.

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1 NRP/CARE offers monetary teeth to the visions and objectives which are emerging out of NRP neighborhood action plans. ~~MNRRA will be a focus of Mississippi Corridor neighborhoods~~ and I believe that residents in MPLS are given a better opportunity to implement their River objectives through the NRP process.

Sincerely,

Guy Fischer
NRP Project Director, Bottineau
Neighborhood Environmental Partnership Coordinator, Bottineau
NRP Coordinator, Stevens Square-Loring Heights
100 3rd St. #3
Excelsior, MN 55331
(612) 474-6003

1. The National Park Service would coordinate with any group interested in the well being of the MNRRA corridor.

[redacted]

July 17, 1993

Superintendent
Mississippi River National River and Recreation Area
175 East Fifth Street, Suite 418, Box 41
St. Paul, MN 55101

Please note the following comments on the Draft Comprehensive *Management Plan/Environmental Impact Statement* for the Mississippi National River and Recreational Area:

Open Space and Trails (p. 30)
I strongly support the plan's emphasis on providing continuous open space and a continuous trail along the length of the Mississippi River in MNRRA (pages 30 - 34). The idea of providing matching grants to state and local governments to purchase land for purchasing open space and for developing this continuous trail is a good one.

Commercial Navigation (p. 34)
I am concerned about the tone of the section on Commercial Navigation on page 34 in that it appears to be biased and incomplete in its initial discussion of the commercial navigation industry. It states that "commercial navigation provides an economical, safe, and energy-efficient form of transportation" but does not present evidence for this conclusion. Information located in the plan actually lists many potential economic and environmental negatives related to commercial navigation industry activities on the Mississippi River.

These include:

> Possible costly, serious accidents should dangerous barge contents (including petroleum products, chemicals, and fertilizers) be spilled during transport, during loading and unloading, or during barge cleaning between loads.
>
> Need for conversion to double-hulled barges to prevent spills.
>
> Problem of bank erosion caused by boat wakes.
>
> Noise and visual impacts.
>
> Use of trees as mooring structures.
>
> Need for periodic, costly, government-funded dredging of the Mississippi River channel to keep it at nine feet.
>
> Need to dispose of problematic dredged materials in an environmentally sound manner.
>
> Possible environmental damage caused by dredging leading to sediment contamination and reduced water quality.

Discussion of the commercial navigation industry in this section and in the section on page 137 should be rewritten to be more balanced. There seems to be a tendency in the plan to glorify this industry, focus on its economic value as a part of the overall economy, and to avoid integrating discussion of environmentally and economically negative aspects of its operations in the initial paragraphs describing the industry. I feel that the first paragraph in the Commercial Navigation section on page 34 is particularly unobjective in its presentation of this industry, and that in the Commercial Navigation section on pages 137-138 waiting until the sixth paragraph to discuss problematic issues with this industry is inappropriate. Non-industry perspectives should be included to the same extent as industry perspectives when describing commercial navigation on the Mississippi. (This is particularly needed on the first paragraph on page 138.)

Natural Resource Management: Pollution (p. 39)
I strongly support the vision that existing air and water quality pollution control standards be met and that the river be swimmable and fishable throughout the corridor. However, I feel that the goal of the plan should be more ambitious than this. I recommend that the objective of the plan be that the water quality of the Mississippi River when it leaves the Twin Cities corridor should be as good as that of the river before it reaches the Twin Cities corridor.

I strongly support the emphasis of the plan on pollution prevention. However, I am doubtful that the proposed policies and actions on pages 40 and 41 will be implemented since I do not see any request in the draft plan for additional resources from Congress, state or local governments to accomplish this purpose. The final plan should definitely include a strong recommendation that additional targeted resources be made available to implement the activities on pages 40 and 41.

This may be accomplished either through a grant program to appropriate agencies, companies, or non-profit organizations, or through direct appropriations to specific agencies. It is not particularly useful to put these excellent ideas on paper and assume that agencies/organizations will increase their focus on

environmental quality if resources are not given to them to do so. Strong consideration should be given to funding a balance of regulatory and non-regulatory efforts to achieve the environmental objectives on pages 40 and 41. This proposed funding should be discussed on pages 86 and 87.

Cultural Resources Management: Cultural Resource Research Needs
The short paragraph on page 47 relating to Native American sites indicates that identification of these sites "remains to be done." However, representative Native American cultural leaders and elders should be consulted about this. They may well prefer that some or all of these sites not be made known to the public for various reasons. If there is a full consensus in the Native American community that they support the identification of Native American sites, then this section should include a clear recommendation that the identification of sites of importance to Native Americans should be conducted. As it reads currently, this section simply says that it "remains to be done" not that it needs to be done. If such an identification process is undertaken, it should be done in close cooperation with representative Native American cultural leaders and elders.

Interpretation, Education and Visitor Services: Interpretive Themes
I strongly support the eight interpretive themes outlined on pages 53 to 56. The recognition of the spiritual significance of the river for many people is discussed, which is good, although this section should be expanded. The paragraphs under themes (2) and (5) are not well organized. Paragraph #2 under theme (2) should be moved to theme (5). Similarly, paragraph #2 under theme (5) should be moved to the beginning of theme (2).

Interpretation, Education and Visitor Services: Interpretation and Education Activities
I am concerned about the lack of clarity concerning the proposed balance of interpretive activities for the NPS Harriet Island Center, which as discussed on page 60 include: aquatic ecology, natural history, stewardship, and the working river. On Table 2 on page 65, the primary themes of the NPS center differ from the list on page 60 and include other items. In Appendix K, the list of primary themes differs yet again, and includes a focus on themes 1,5,6,7, and 8 on page 230, which differs from Table 2 and from the themes mentioned on page 60. So it is unclear what the plan actually proposes for the themes of the NPS center on Harriet Island.

Assuming that Appendix K, being the most detailed, is also the most accurate reflection of the plans for the NPS center, I am opposed to the current selection of primary themes. On page 232, the "People and the River" general space is heavily (and I

center, the emphasis on this theme is not balanced in the current plan. I feel that "People and the River" should include extensive discussions of Native American influences, history, and stewardship as well as commercial navigation. I strongly believe that themes 2 and 3 on page 230 should be a major focus at the central NPS center, and contrary to the plan I do not believe that these core themes should be relegated to other, smaller interpretive centers. I am very opposed to the extensive focus on commercial navigation in the center as is now proposed. It is very important that this center touch visitors with the core reason that MNRRA exists, which has to do with the non-commercial, non-industrial elements of the Mississippi. So, despite Harriet Island being in an urban setting, the center's activities should not necessarily focus on the urban and the commercial elements of the river. Actually, I believe that Harriet Island's urban setting gives a stronger reason to focus on natural history and cultural themes, since raising urban dwellers' awareness on these issues is more needed. They are no doubt well aware of the commercial and industrial surroundings of the river in the city. I do not believe that Congress chose the National Park Service as the coordinator of MNRRA in order to focus key emphasis of the MNRRA center on commercial and industrial themes.

On page 232, I was disappointed to note that only "commercial and recreational organizations could assist with the development of media exploring human interaction with the river." I feel that environmental groups, Native American groups, and other involvement is needed in order to better assure a balanced perspective of human interaction with the river.

Partner Roles
Although a token reference to the Minnesota Pollution Control Agency was made in the first paragraph under "Partner Roles" on page 76, I feel that it is important that the plan elevate discussion of those partner agencies and organizations that can contribute to the pollution-related policies and actions discussed on pages 40 and 41. I feel that the plan is not dedicating adequate space and depth to pollution-related issues within MNRRA and to the efforts and resources that are needed to ameliorate pollution-related problems. A full paragraph should be devoted to discussing environmental agencies and organizations (including Minnesota Pollution Control Agency, Metropolitan Waste Control Commission, Metropolitan Council, Minnesota Office of Waste Management, other local and municipal environmental regulatory authorities, non-profit organizations including Citizens for a Better Environment, and other organizations with activities relevant to improved water quality in the Mississippi River).

Coordination and Consistency: Strategies for Streamlining the Regulatory Structure
I support the general concept of streamlining regulatory activities related to the Mississippi River as discussed on pages 81 and 82. However, I think that it is important to include in the final plan some discussion of and acknowledgement of non-regulatory approaches that can facilitate compliance with environmental laws and that can promote environmental protection. The Minnesota Technical Assistance Program and/or the Minnesota Office of Waste Management should be considered for inclusion in the discussions envisioned on page 82, such as the task force described in (2). The last sentence on page 161 reinforces the draft plan's limited focus on regulatory agencies' roles in environmental protection.

Water Quality
This short paragraph on page 84 should be expanded to include a greater emphasis on this important subject and should include more specific plans for MNRRA water quality related activities. Please note above comments on "Partner Roles" and "Natural Resource Management: Pollution" sections for topics for inclusion in this section (including need for additional resources, need for more ambitious water quality goals, involvement of key regulatory and non-regulatory water quality stakeholders, etc.)

Alternative B
General comments are that this alternative overly relies on heavier NPS involvement in MNRRA activities to accomplish increased resource protection goals. It seems to be more an "NPS-centered" scenario than a "Resource Protection" alternative. A scenario that does not necessarily involve more NPS involvement but instead places a greater focus on resource protection through state and local organizations should be developed in order to provide a genuinely attractive resource protection based alternative to the proposed plan. Heavy NPS involvement is not particularly desirable in a "resource protection" alternative since it drives up costs and NPS is probably not the best agent for accomplishing many needed resource protection objectives in Minnesota.

Visual Character Analysis: Constraints and Opportunities
The first sentence on this section on page 152 is in error. There has clearly been human use of the Mississippi corridor for well over 140 years. Far earlier human use of the Mississippi is indicated on page 123. (as early as 9,000 years ago)

This same error (which appears not to recognize the importance of pre-European use of the river) is repeated on page 242 under the definition of "Working river" which states that "the Mississippi has been extensively used for over 200 years for navigation....."

Impacts to Economic Environment: Costs of Complying with Land Use and Environmental Protection Policies (Existing or Proposed)
While environmental compliance may result in additional costs for businesses, in many cases, by preventing pollution or the generation of waste in the first place, companies will save money in terms of raw material costs, waste management costs, and regulatory burden. Again, consideration should be given to non-regulatory approaches of achieving environmental compliance, particularly pollution prevention, since these are examples of how environmental and economic benefits often coincide.

Thank you for your consideration of these comments.

Sincerely,

Paul Moss

July 21, 1993

National Park Service
175 East 5th Street
Suite 418, Box 41
St. Paul, MN. 55101-2901

Dear Mississippi River Coordinating Commission;

I am excited to learn that efforts are being made to protect and preserve the Mississippi River through the National Mississippi River and Recreation Area (MNRRA). I am also encouraged that the river will be a designated area for the enhancement of recreation and the protection of wildlife.

I think that in order to make the management plan a success it is important to ensure water quality in the river and protect the health of ecosystems. Specifically, the issue of toxics in the river must be addressed. Protection and restoration of wetlands also must be a key provision in MNRRA management plan.

I support plans to create a trail and greenbelt system along the entire river corridor. I believe that linking the trail to existing neighborhood parks and trails will greatly increase public access. It is important to insure access for the diversity of neighborhoods and communities who enjoy the river.

It is also important to encourage non-motorized recreation on the river by adding no-wake zones and horsepower limits.

Please incorporate these elements in the MNRRA plan. Thank you for your efforts in protecting the river.

Thank you,

Donald L. Bruestle

Concerned Citizen

DONALD L. BRUESTLE

[redacted]

Gwen and Mason Myers

[redacted]

June 26,1993

National Park Service
175 East 5th Street
Suite 418, Box 41
St. Paul, MN 55101-2901

Dear Mississippi River Coordinating Commission:

We are excited to learn that efforts are being made to protect and preserve the Mississippi River through the National Mississippi River and Recreation Area (MNRRA). We are also encouraged that the river will be a designated area for the enhancement of recreation and the protection of wildlife.

In order to make the management plan a success, we believe that it is important to insure water quality in the river and to protect the health of ecosystems. Specifically, the issue of toxic material in the river must be addressed. Protection and restoration of wetlands also must be a key provision in the MNRRA plan.

Plans to create a trail and greenbelt system along the entire river corridor are essential. Linking the trail to existing neighborhood parks and trails will greatly increase public access and support. It is important to insure access for the diverse neighborhoods and communities who enjoy the river.

Finally, it is extremely important that non-motorized recreation on the river be encouraged by adding no-wake zones and horsepower limits. If you have any doubts on this point, please visit Lake Minnetonka on a Saturday afternoon.

We hope you will incorporate these elements in the MNRRA plan. Thank you for your efforts in protecting our river.

Very truly yours,

Gwen S. Myers

Mason C. Myers

Gwen S. and Mason C. Myers

"A poem for my friends"

HERE COMES THE FLOOD

The rain will end when the earth is cleansed
and the choice of creation
is again balanced in the union of god and man

Mother earth and father sky
hold the tears of Love and joy
releasing the illusion of seperation
as they share thier true natures together

The tiny drop of human existance
striving for greatness beyond all creatures
IT IS TRUTH, THOUGHT CREATES REALITY
yet creation is not of mankinds design
it is of gods

The rain will end when mankind understands
the power greater than ourselves
is not what we strive for or fear
it is what we already are

The rain will end when all understand
"We did not weave the web of life
We are but a strand in it"
(Chief Seattle)

Wholy taking part in all creation
yet we are not the creator

Love always
and
Love all ways



WHEN THE SUN RETURNS

Rainbows light the way of peace
the perfect union of sun and rain

In the rainbow's parts there is a harmony of one light
each equally represented and all magnificently beautiful

Growth is not achieved by rain alone
creation is the bridge by which
Love and Love are joined

The light of the sun and the rain of the earth
combine in the wholeness of the universe
I stand in wonder as the visible expression of God's Love
shines forth into this world (the rainbow)

Light can never leave the earth
for the strength of the sun
is beyond our imagination

Standing beneath the rainbow of Love
in faith I now clearly accept and believe
God's promise to the children of earth

In your world filled with illusion and seperation
you are whole in your identity as a child of God
as God's identity is wholy in God
the father of Love(sun) and the mother of Love(earth)
could only create Love
niether distance nor time could seperate
the Love shared in our creation
balanced in our true identity
we are complete in God's Love

Give thanks and praise



We have been redeemed

William A. Hale

MNRRA Comment Sheet

Name: LINDA & GERRY ANDERSON

Group/ Company: (If Any)

Address: [redacted]

City/State zip

Comments

Recommend adjusting the boundary line to incorporate all of Battle Creek Regional Park — including that portion in Maplewood. It makes no sense to have the lower portion of the park within the NPS boundary & the upper half not within the NPS boundary. Just because the lines have always been that way now is the opportunity to change it!

Linda Anderson

-over-

#R12 25-22-0005 ND Shaws Addition to Anoka 17 Block 6 40 Thereof Lot 24 Auditors Plat [illegible] of 195

(Gerri)

My name is Catherine Greig Jacobsen. I live at 720 Benton Street in the City of Anoka. I and my late husband have owned this property since November, 1954. When we bought it, it had already been developed by the previous owner, Carter Reed by erection of a house near the street and a picnic house near the Mississippi River. The house stands on Lot 17 of Block 6 of N.D. Shaw's Addition to Anoka and the picnic house stands on Lot 24 of the Auditors Plat of N.D. Shaws Addition.

When we purchased the property, we understood that our riparian rights extended to the River shoreline, and we have not changed the character of the property except to eliminate a large, irrigated vegetable garden which occupied the center of the property and to cut down and replace dead trees. The flooding of Lot 24 has not permanently injured the picnic house.

Having read the proposed alternatives, I have a few critical concerns:

1) The boundaries of the district were arbitrarily placed along existing streets rather than along the natural elevation contours; the 3rd St. limit does not take contour into consideration either.
2) The Plan B does not ~~define~~ include inconsistent uses.
3) Plans B and C do not specify what corridor resources are to be more fully developed: i.e., the proposed reactivation of hydro-electric power at the Coon Rapids Dam — the main cause of winter flooding along the upper River while NSP owned it.
4) The Park land ownership proposals do not indicate what effect transfer to NSP will have on our local Park District taxes, or upon the Metropolitan Council activities.
5) Is the Metropolitan Council be reduced to a monitoring organization? Who is going to enforce no-wake laws and the like? The NPS or the counties or the localities?
6) The NPS does not have a good record for holding to only the original proposals. The DNR does

COMMENTS

MNRRA Comment Sheet

Name: Al Dittrich

Group/ Company: (If Any)

Address: [redacted]

City/State zip [redacted]

Comments

- Al Dittrich 11234 Creek View Ln Champlin Dittrich
- [redacted] I also apologize for being late AND hope if ANYONE finds my comments to be redundant to be understanding
- I want to tag on to the earlier comment MADE supporting local MANAGEMENT of the AREA
- I think ALL of these plans ARE NICE PLANS AND there are many good things in these plans, but we can oppose preservation for the future. but I don't UNDERSTAND how ANY government CAN support spending ANY funds on this project when overall [redacted] fiscal ACCOUNTABILITY is out of control. We ARE currently under funding state AND NATIONAL PARKS that we have. how CAN we justify Adding more STRESS + these budgets. -over-

ONE MAY SAY these funds come from "ANOTHER SOURCE". (In my mind it's all the same - now higher taxes or higher deficits) HENCE AS I SAID before fiscal responsibility is out of control.

They are all nice plans

My wife AND I recently looked at some NICE PLANS for a backyard pool we can't have that until we can afford it

I urge our government to take the same approach, let the local governments continue to do the job they've been doing until what we currently have can be taken care of.

RECEIVED JUL 2 8 1993

MNRRA PUBLIC MEETING

Statement — see back

I would like to make a statement about the draft comprehensive management plan/environmental impact statement for the Mississippi National River and Recreation Area.

Name: Linne Pund

Group/ Company: (If Any) Uche

Address: [redacted]

City/State Zip [redacted]

Office Use Only: Status ____ Loc ____ H/O ____

What can be done to remove (stop enlarging) the rail road from the national river park area around SSP & across (directly) the river from it & Battle Creek / Newport, This is a blight on the land, & view of the area also noisy & smelly

Statement Correction

MNRRA Comment Sheet

Name: Karen Bacy

Group/ Company: (If Any)

Address: [redacted]

City/State zip [redacted]

Comments

In my statement I was told afterwards that in my responses I requested the MRRA Rep to saying "We don't see ourselves as an enforcement agency What I meant to say was "We don't see ourselves primarily as an enforcement agency" Could you please change the record to reflect this change?

-over- Thank you!

DEAR SIRS—

I'VE READ THE DRAFT PLAN AND EIS WITH GREAT INTEREST. FOR THE MOST PART THE COMPREHENSIVE PLAN AND EIS IS WELL BALANCED, AND I STRONGLY ENCOURAGE THAT THIS PLAN, WITHOUT THE ALTERNATIVES, BE ADAPTED.

BUT I BELIEVE IF THE PLAN IS FULLY IMPLEMENTED NON-POINT POLLUTION COULD AND PROBABLY WILL HAVE DIRE ENVIROMENTAL CONSEQUENCES OVER THE LONG RUN AND AS SUCH UNDERMINE THE PLAN, SO I ENCOURAGE THE COMMISION AND MPS TO INCLUDE A MORE STRONG ENCOURAGEMENT IN THE PLAN FOR THE STATE OF MINNESOTA AND UNITS OF GOVERNMENT ALONG THE CORRIDOR TO DRAFT A PLAN AND IMPLEMENT IT SO THAT NON-POINT POLLUTION IS REDUCED FURTHER THAN CURRENT PLANS IN PLACE NOW. THIS AND ONLY THIS I BELIEVE WILL PROTECT THE BALANCE OF THE CORRIDOR FOR MANY GENERATIONS TO COME.

THANK YOU,
KELLY McGRADE

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RECEIVED AUG 2 1993

July 30, 1993

Superintendent
Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418, Box 41
Saint Paul, Minnesota 55101

Since time did not permit my making a public comment during the public hearing at Augsburg on July 30, I am submitting this written comment.

I support the Clean Water Alliance's recommendations including recognition of the historic relationships of Native Americans to the Mississippi River.

The Mississippi River is the most significant geographic feature in our region. Over the years, as a teacher in the Minneapolis Schools, I have found many children are as familiar with the Mississippi River and its impact on their lives as they are with the Gulf of Mexico and Hudson Bay. I support the development of interpretive centers in Minneapolis and St. Paul with historical and environmental programs and an aggresive outreach program to schools and other interested groups. Only in KNOWING the river can future generations respect it, preserve it, and use it wisely.

Josephine Donnelly

[redacted]

Richard Buchinger
[redacted]

August 11, 1993

Peter L. Gove, Chair
Mississippi River Coordinating Commission
U.S. Department of the Interior, National Park Service
Mississippi National River and Recreation Area
175 Fifth Street East, Suite 418, Box 41
St. Paul, MN 55101-2901

Dear Mr. Gove:

I am a member of Bottineau Citizens In Action which represents a neighborhood located on the River in Northeast Minneapolis. I have lived on the River for 50 years, and my family has lived on the River for 132 years. I would like to thank you for the opportunity to comment on your recently complete Draft Environmental Impact Statement. My comments will be brief and address my concerns from a River resident's viewpoint, as follows:

1. **Trails** are worthwhile and good for all to use, but I think it is unwise to put them between private property and the Riverfront. Really, there isn't enough room during periods of high water, and the trails would be continually washed out, adding to the parks' maintenance costs during a time of continuing cuts in expenditure of federal, state, county and municipal funds.

2. **Industrialization** is a necessary component of our society and provides for wages, security and tax bases. However, I believe the real important issue is to preserve the natural appearance of the River! I realize industry cannot immediately be removed from the River banks. Nevertheless, it should be a long term objective. For the short term, every effort should be made to screen the intrusion from River users and residents. Without exception, industrial use on the River and its banks must be controlled with the most stringent use of existing laws to prevent pollution and environmental degradation! It is amazing that you can still watch waterfowl, fur bearers and other wildlife cruising the banks. ***Keep it that way!***

3. **Lowry Avenue Bridge**: Since I look to the north every day, up the River, I believe it is important to preserve the Lowry Avenue Bridge. I realize that it is an expensive endeavor. Lead abatement and repainting alone could cost $2 million to $3 million. However, it is a component of the historical character of the River, going back many years, and it is worth preserving as a part of the cultural landscape.

4. **The River as a learning laboratory**: This morning it occurred to me that the City Barge (steamboat) would be a wonderful way to take urban children up the River to enjoy all the benefits of a world they are not used to seeing, even though they live in the City. Therefore, it is important to respond to my other concerns to preserve the River for these children of a future generation.

5. **Continue the dialogue with River residents:** Finally, those of us who are members of Bottineau Citizens In Action are concerned about having our voice heard by those who govern the River in Northeast Minneapolis. We welcome the opportunity to continue our dialogue with those governing groups.

Thanks for listening to my concerns. I trust the National Park Service, as the primary author of the Draft Environmental Impact Statement, will share my views with all agencies and members of your team. I share a mutual interest in protecting the River. So, let's do it together!

Sincerely,

Richard Buchinger

Richard Buchinger

The City of Richfield

PLANET SAVERS

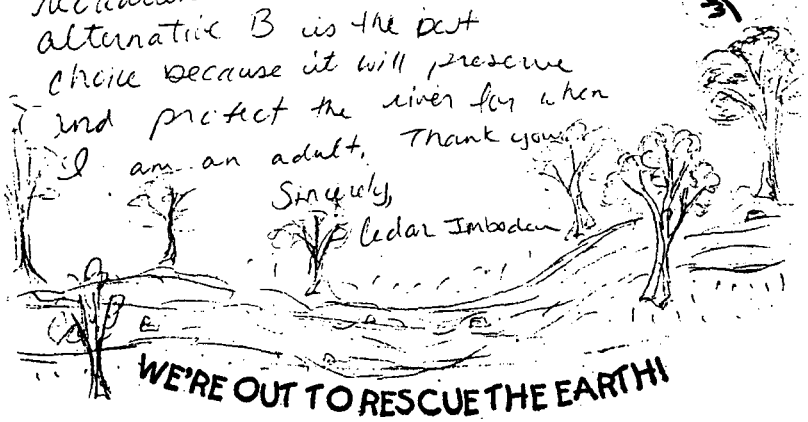
WOODLAKE NATURE CENTER'S ENVIRONMENTAL KIDS CLUB

Dear Superintendent,

Please use alternative B for the Mississippi river and recreation area. I think alternative B is the best choice because it will preserve and protect the river for when I am an adult. Thank you.

Sincerely,

Cedar Imboden



A member of

KIDS FOR SAVING EARTH

August 16, 1993

Superintendent
Mississippi National River and Recreation Area
175 5th Street East - Suite 418
Box 41
St. Paul, MN 55101-2901

Dear Superintendent,

I am have been reading the Draft Comprehensive Management Plan Environmental Impact Statement for the Mississippi River Corridor. I would like to add my comments about this great natural resource sitting in our back yard. I am impressed with the bulk of the plan and admire the work that went into it. There are some areas that I would like to show support for and some areas that concern me.

Before I get to some of the more specific issues, I would like to state my support for the concept of the National park Service acting as a coordinator and partnerships with local government in implementing these recommendations. I realize that there are some individuals and organizations, including groups that I am a member of who would like to see a stronger role for the NPS. Of course, there are others that would like to have the NPS have no role. It is my opinion that there needs to be an agency to monitor what happens within the corridor and establishes standards and guidelines as a framework to work in. However, I believe that we need to educate and guide local governments in adopting these guidelines as opposed to automatically mandating them. Several municipalities and counties within the corridor are already implementing programs that protect the river and should be encouraged to continue. We can always mandate these regulations, but done, it is harder to reverse the process. The river should be as clean when it leaves the corridor as when it arrives, and hopefully we can achieve this through partnerships and a collaborative process.

However, even though I do not believe that the NPS should mandate behavior, I believe it needs enough staff and visibility to make a difference. Some of the phases and ideas that are included in alternative B that I would like to see incorporated into the actual proposal include: emphasizing the natural shoreline appearance, phasing out non river dependent uses within 300 feet of the river, encourage pollution prevention and cleanup, installing additional wayside and information kiosk and more emphasis on monitoring threats to the resource.

I would like to see a continuous biking and hiking trail created along the river coordinator with connections to other parks and trails, but not through condemnation of local land owners. The same would hold true for emphasizing the natural shoreline appearance which could be accomplished through education rather than mandating a homeowners landscape. I would like to see other non-motorized use strongly encouraged throughout the river and enforcement of speed and noise laws along the river.

The current plan calls for a minimum of land actually be incorporated in the National Park System. I believe that the NPS should take the lead in identifying wetland and critical open space and work with local governments in protecting these areas. Once again, actual acquisition of these lands by the NPS should happen only if it appears that this protection does not appear to be happening. The NPS should work with local environmental groups to monitor these lands so that a coordinated plan is designed and the protection of these lands is ensured.

I support the monitoring of barge traffic, but do not advocate freezing it. Additional facilities should be heard on case by case basis for the near future. I would discourage non river dependent business from locating either in the flood plains or along the bluff.

In conclusion, it would appear that I support alternative B over the current proposal. I believe that the recommendations outlined in the proposal should be viewed as minimum of should be done to protect the river. I encourage the National park Service in its role of lead partner along with the Mississippi River Coordinating Commission in ensuring the long term protection of the river.

Sincerely,

Michael T. Murphy

Daniel J. Dobbert
[redacted]

August 21, 1993

JoAnn M. Kyral, Superintendent
Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418
Box 41
Saint Paul, Minnesota 55101-2901

Dear Superintendent Kyral:

I have attended many of the public meetings of the Commission and am impressed at the openness to public input. The management plan resulting from your work and many others is very good. I am proud to have NPS in our community and look forward to a smooth cooperative future. Even with the high quality of the plan there are several items that concern me, which I would like modified.

Concerns I have are presented below:

What is the focus group referred to many times in the plan? It appears to have significantly influenced the Draft Plan. Membership of the focus groups and content coverage should be included in the plan to openly show where additional content originated. I would like to receive a copy of the report describing methodology and results of the focus group.

Page 1, "the commission was established as a coordinator and advisory organization to assist...". That being the case, why was that not stated specifically at the commission meetings. The document should clearly state how and what input was received from the State of Minnesota and local units of government. I would like a specific citation of the units of local government contacted, type of contact, and related date. Responses, if any would be interesting to show that this interface did occur.

Page 17, membership of the NPS study team, including positions and contribution to the plan, if stated, could clarify the development of the plan.

Page 29, (13) when work to increase and restore wildlife habitat in development projects is undertaken specific effort to reduce plant pest, human annoyance and human disease vector insects (mosquitoes, black fly, ticks, etc.) should be included in review of that work. This I would consider part of implement of IPM. My request is in agreement with page 1 (2) enhanced public outdoor recreation opportunities in the area. I do not enjoy the risk of infection and annoyance levels of insects in the corridor. Impact on the surrounding area should be considered in development decisions.

Page 39, resources management does not state the coordination roll of the NPS will operate. Who will decide, what will be balance of power, and how will decisions be made? The role and involvement of state and local government is not clear. I would like to see more open statements of how other levels of government will be involved in the process without increasing the time for decision making.

Page 40, (6) Include a referenced (footnotes) statement of what IPM is understood to mean by the writers of the report. Decisions should be made on technology that clearly works today or that people would like to develop or see used but not evidence shows it works today to control problems present today. Recognition that some are using very low levels of control materials today and should be given room to continue their development. Others may be overusing materials and should be encouraged to reduce consumption. To merely say x percent decrease by all treats all as misusers of the environment, not recognizing individual differences.

Page 41, (20) limits to the review of federal regional air quality permits need to be clearly stated and justified in the plan. Is NPS becoming another super agency over state and local government? Exactly how is the role of the NPS, MNRRA envisioned? Please describe the role in the management plan. Today, people seem to want streamlined government and less levels not more. How does this plan streamline or reduce the confusion? The improvements envisioned in the Federal Statute need to be highlighted in the plan. The public review period should be redone as the present plan does not provide for review of a point covered specifically in the statute.

Page 42, The resource management plan focus group in file at the MNRRA headquarters need to be presented in the plan to permit other levels of review to know and review the content. The on-file document should be mailed free to any who desire a copy. I request a copy for my review.

State and local government involvement in development of the resource management plan are not mentioned in this plan Though statute states they will be. State and local government involvement should be stated and available for review now. Their (state and local government) role and the input from public when not mentioned does not provide for adequate review of the present draft management plan.

Page 48 on concerning research needs, it should be clear that MNRRA will not limit research but will encourage all research, and specifically that which it has identified as significant to attain the goals stated under the management plan. It is important to clarify what the NPS sees as its roll in coordinating research. The first paragraph in on page 49, says ... "Research should also be done to investigate the effectiveness of corridor interpretation and education programs and facilities." I would like to know if that is a research problem or an evaluation problem? Some would likely call it evaluation research but is it research? Because of the lack of clarity, adding further statement of the NPS role would be useful.

The sequence on Visitor Activities and Recreational Resources should state that an effort will be made to control/manage annoyance and disease insects (mosquitoes,

black flies, ticks, etc.). The level of those pests and others detracts from the use and enjoyment of the outdoors. Mention of how NPS will impact that concern effectively today, not in the future, needs to be mentioned and not overlooked, as in this management plan.

Page 53, says "feel safe while using the corridor areas." Health and physical safety are not mentioned and from attendance at the commission meetings I feel the target is crime. To clarify I request that health safety should be included alone with freedom from crime.

Page 56 and 61, Visitor Programs and Interpretive Media make no mention of use of computer technology. Mention that computer software, bulletin boards, etc. will be included in the visitor orientation possibilities. To leave out methods of that type in an area where Cray Research and CDC began omits their contribution to the corridor. Look at the Minnesota History Center for initial ideas. With the U of MN so close making the use of computer technology a reality should be less of a problem than some other sites could be.

Page 59 and 69, how can the center at Harriet Island be seen as a good example of development and consistent with the plan? It is on the flood plain. The 1993 flood demonstrated that the flood wall or levee barrier is not absolute. Why not be consistent in action and statement by locating the visitor center in a place where others would be encouraged to develop. To develop a center in a location and way shown not consistent with federal flood plain development law (federal facilities can not be built on 100 year flood plain and after the 1993 flood the total island is still able to be flooded as the island had water on it) and regulations only implicitly say do as I say ignore what I do. MNRRA should be a leader in doing what is right not what we all have seen can reasonably be a problem if not now in the future.

Page 74, why does the GSA, which has a strong presence in the corridor, not get involved with the services proposed to be contracted to private business? No explanation has been offered for that position in the plan. Unless private vender services can be justified in the plan the GSA should maintain the NPS facilities in the corridor. I would extend that to the St. Croix but only if there is a GSA presence in that area which I believe is not the case.

Place 75, 78, I strongly support assignment of responsibilities to appropriate state and local government agencies. I request that those responsibilities assigned to state and local government not be additional services to be performed without specific additonal funds but to invite them to continue what they have done and want to do if consistent with the plan as broadly interpreted. The definition of what is appropriate and what is not is the missing part which I request be considered and included here. This request seems consistent with the statement at the bottom of page 78 saying local control would be maintained.

Page 82, covering streamlining and reduction of duplication provides illustration of the multiple layers of regulation but adding MNRRA as an additional level is not streamlining. I urge a statement defining what is considered streamlining be included in

the plan at this point. That statement should define streamlining as less paper work and no increase in review time and activities necessary for completing a review. A clear statement, that MNRRA review would be concurrent not consecutive and no additional paper work or time for the review process would result from MNRRA involvement, needs insertion in the management plan.

Review of how this plan would impact tax exempt bond issue legal opinions is missing. Such issues generally provide an opinion of the projects or purpose for which funding is being obtained as in compliance with applicable law. No delay or change from the current timeline is acceptable as timing when entering the financial market is important and missteps can be costly. How taxpayers going to be protected from this potential problem is not considered in the Draft Management Plan.

Page 83 and 84, indicate review of state and federal programs for consistency with the management plan. Why were local government plans not reviewed? The MNRRA was established in 1988, and while the present plan does not say when the state and federal program reviews occurred, there was time to review at least a portion of the local plans. This management plan should not be approved until local government plans have been reviewed for consistency with the MNRRA mandate and management plan. To do less again relagates that part of government closest to the people a non place in this review process.

The Management Plan does not state how it would provide access to the disabled as provided by the ADA, Voc Rehab Act of 1973, and other similar legislation and regulation. I request that the plan approval be withheld until compliance is attained and review be redone. Minimum compliance, as I see it, would include TDD access (notice to use Minnesota Relay Service and inclusion of their number in all material distributed to the public), statements in all print materials that the material is available in alternate form upon request, statement in the plan that video and film will be open captioned and all telephones in NPS, MNRRS offices and public phones will be hearing aid accessible.

MNRRA and the NPS operations in MN should state they agree to comply with MN environmental rules, regulations, and law to the extent it does not cost significant funds. An example would be compliance with the recycled paper law. The printed materials, including the Draft Management Plan Document, if printed on recycled paper would state the post and pre-consumer content by percent. Leadership in environmental protection, enhancement, and education should come form the agency encouraging that. NPS and MNRRA should walk the walk not just talk the talk of environmental education and stewardship. The lack of that performance in the draft management is another reason I request approval be withheld and review redone. To do otherwise will provide the example for others to follow and I do not see a justification to holding someone to a higher standard than that I am willing and do follow myself.

Participation in development of the management plan by minorities, disabled, and individual citizens was not discussed in this Draft Management Plan. If the NPS and MNRRA are to meet the needs of all citizen, not discussing how they were involved in development of the plan is a critical oversight which needs to be set right before

approval. Again, this is reason to require recycling the public review and comment period and I request that occur.

Attendance a several Commission Meetings and all but two of the current public hearing shows input from disabled and minorities nearly lacking in attendance at the meetings and membership on the Commission. The plan needs to clearly state that in time (specifically what amount) minority and disabled membership and involvement will occur. This concern and the accessibility under ADA and other laws was brought to the attention of the Commission and NPS, MNRRA staff at a Commission meeting. Assurance was provided at that meeting that the printed materials would be in compliance but this did not happen. I believe in good intentions but it is also important tcarry out those intentions.

I heard Representative Vento state at a public Commission meeting that the MNRRA would be implementing all other NPS and Deprartment of the Interior rules, regulations, policy, and laws. That statement should be denied if Represenative Vento was incorrect. This concept was not mentined in the Draft Management Plan. Other rules, regulations, policy, and laws affecting the MNRRA are not mentioned in the Draft Plan. I request that rules, regulations, policy, and laws affecting the MNRRA in addition to the Management Plan should be clearly summerized and thier potential impact assessed in the minimum through maximum case method as for actions in the Draft Management Plan. Review of the current plan is not possible as the Draft Plan is not a complete statement of all rules, regulations, policy, and laws affecting the MNRRA.

Thank you for the opportunity to comment on the Draft Management Plan for the NPS, MNRRA. I appreciate the excellent work done on the plan by all involved. It is my sincere hope to see a first class visitor center and education program begun very soon. If I can be of further support of your efforts please feel free to call on my support.

Sincerely,

Daniel J. Dobbert

CC: Representative Vento
Minneapolis Star Tribune
St. Paul Pioneer Press

RECEIVED SEP 0 2 1993

Daniel J. Dobbert
[redacted]

August 31, 1993

JoAnn Kyral, Superintendent
Mississippi National River and Recreation Area
175 Fifth Street East, Suite 418, Box 41
St Paul MN 55101-2901

Dear Superintendent Kyral:

Thank you for your letter of August 26, in response to my comments on the Draft Management Plan for MNRRA.

This should be considered as a further comment appended to my initial review. The term focus group is a term of art and as such is used in a possibly misleading and in correct manner in the draft report. A Focus Group has a methodology. If, as your letter says they were "... allowed the latitude to define and adapt whatever mechanism they thought necessary for accomplishing the task." they were not a Focus Group. To keep communication clear and highly professional, I request that you replace the term Focus Group with the term Planning Workshops, which is what they have been referred to in the material you sent me with your August 26, letter.

Attached is a description of the focus group technology may clarify my concern with using the term in the Draft plan.

Sincerely,

Daniel J. Dobbert

FOCUS GROUPS

A Practical Guide for Applied Research

RICHARD A. KRUEGER

Foreword by Michael Quinn Patton

SAGE PUBLICATIONS
The Publishers of Professional Social Science
Newbury Park London New Delhi

confusion, misunderstandings, wasted time, and—most likely—the wrong conclusions.

The second type of confusion relates to the group process. Group leaders may not have the necessary skills to guide the group process. Effective leadership is essential if the group is to accomplish its purpose. The group leader must not only be in tune with the purpose of the group but also have the necessary skills to guide the group process effectively. Furthermore, the skills necessary for one type of group experience do not necessarily transfer into other group settings.

THE FOCUS GROUP: A SPECIAL TYPE OF GROUP

The focus group is a special type of group in terms of purpose, size, composition, and procedures. A focus group is typically composed of seven to ten participants who are unfamiliar with each other. These participants are selected because they have certain characteristics in common that relate to the topic of the focus group.

The researcher creates a permissive environment in the focus group that nurtures different perceptions and points of view, without pressuring participants to vote, plan, or reach consensus. The group discussion is conducted several times with similar types of participants to identify trends and patterns in perceptions. Careful and systematic analysis of the discussions provide clues and insights as to how a product, service, or opportunity is perceived.

In summary, a focus group can be defined as a carefully planned discussion designed to obtain perceptions on a defined area of interest in a permissive, nonthreatening environment. It is conducted with approximately seven to ten people by a skilled interviewer. The discussion is relaxed, comfortable, and often enjoyable for participants as they share their ideas and perceptions. Group members influence each other by responding to ideas and comments in the discussion.

THE STORY BEHIND FOCUS GROUP INTERVIEWS

Focus group interviews were born out of necessity. In the late 1930s, social scientists began investigating the values of nondirective individual interviewing as an improved source of information. They had doubts about the accuracy of traditional information gathering methods, specifically the excessive influence of the interviewer and the limitations of predetermined, closed-ended questions

interview, which used a predetermined que
response choices, had a major disadvar
limited by the choices offered and, there
unintentionally influenced by the interview
By contrast, nondirective procedures begi
and place considerable emphasis on getting
interviewee. Moreover, the nondirective i
questions and allowed individuals to respon
or providing clues for potential response
approaches allow the subject ample op
explain, and to share experiences and a
structured and directive interview that is do
Stuart A. Rice was one of the first social scie
1931, he wrote:

> A defect of the interview for the purposes
> research, then, is that the questioner takes t
> plays a more or less passive role. Informatic
> highest value may not be disclosed becau
> interview by the questioner leads away from th
> from an interview are as likely to embody thi
> interviewer as the attitude of the subject inter

As a result social scientists began consider
researcher would take on a less directive an
respondent would be able to comment on
respondent to be most important. In effect, t
interviewing was to shift attention from the
dent.

Nondirective interviewing had particular
and psychologists in the late 1930s and
Dickson (1938) cited it in studies of empl
Rogers (1942) in psychotherapy. During
attention was placed on focused interviewin
means of increasing military morale. Many o
come to be accepted as common practice in fo
set forth in the classic work by Robert K. Me
Patricia L. Kendall, *The Focused Interview*

In the past thirty years, most applications o

The City of Richfield

RECEIVED AUG 2 4 1993

PLANET SAVERS

WOODLAKE NATURE CENTER'S ENVIRONMENTAL KIDS CLUB

Dear Superintendent,
I am 12 years old
I would like to have
Alternative B.
Becuas I would Like to
have the clean River?

Sincerely,
Danielle Walentiny

WE'RE OUT TO RESCUE THE EARTH!

A member of

KIDS FOR SAVING EARTH

The City of Richfield

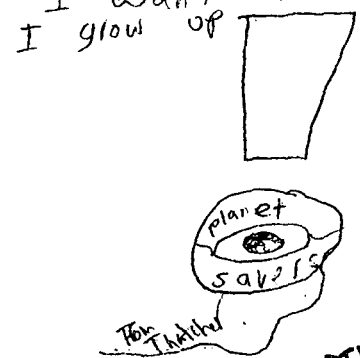
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RECEIVED AUG 2 4 1993

PLANET SAVERS

WOODLAKE NATURE CENTER'S ENVIRONMENTAL KIDS CLUB



Dear, Superintendent

I vote for Alternative B

So the lakes will be beautiful when I grow up

Sincerely,
Drill

WE'RE OUT TO RESCUE THE EARTH!

A member of



KIDS FOR SAVING EARTH

J. Stephen Schmidt

[redacted]

(612) 421-0960

August 23, 1993

Superintendent
Mississippi National River and Recreation Area
175 East 5th Street
Suite 418, Box 41
St. Paul, MN 55101

re: Mississippi River Coordinating Commission and N.P.S.

I have reviewed the draft summary of the work of the commission. I am a life-long resident of the Anoka area, and have lived on or near either the Rum River or Mississippi River for 40 years.

I believe the best and most desireable plan is Alternative A, followed by Alternative C. My comments apply to that portion of the river I know best, namely up river from the I-694 bridge.

There are too many areas in federal hands, administered by park personnel who must make decisions based upon extraordinarily cumbersome procedures, resulting in inflexible regulations. Once in place, the rules are enforced but the facilities and rights for which existing rights have been traded are lost due to budgetary constraints, political pressures, small activist groups bringing lawsuit after lawsuit, etc.

We have sufficient regulatory bodies - let them acquire park land, regulate river front area land use, and promote greater use of the river resource.

I can clearly read new restrictions on river use in the proposed plan description of "provide broad range of activities in appropriate areas ".

We need no N.P.S. interpretive and administrative facilities in St. Paul and Minneapolis. Minnesota already has the largest wilderness area in the U.S. in the B.W.C.A.W.

I believe there are adequate controls in place from numerous regulatory bodies.

In the area I know, with existing regulations, I this weekend caught bass, walleye, catfish, and northerns. I saw jet skis, water skiers, inner tubes, pontoon boats, and canoes. I heard a Coopers Hawk, saw an eagle, watched numerous shore birds including numerous blue herons. I saw swimmers, picnicers, fishing, and bank sitters. Turtles and rafters watched each other.

This is an urban area, our urban area, upstream from the I-694 bridge, and I find it wonderful that the river is providing so much to so many.

Alternative A best suits the nature of the Mississippi in the Anoka area.

Sincerely,

J. Stephen Schmidt
JSS:brh
cc: City of Anoka, Mayor and Council
Governor Arnie Carlson
U. S. Congressman Rod Grams
State Representative Charlie Weaver

J. Stephen Schmidt
[redacted]
(612) 421-0960

RECEIVED SEP 0 7 1993

September 1, 1993

Superintendent
Mississippi National River and Recreation Area
175 East 5th Street
Suite 418, Box 41
St. Paul, MN 55101

re: Mississippi River Coordinating Commission
and N.P.S.

I have already responded to the draft summary of the work of the commission. I only learned of the plan by requesting a copy.

I have asked nearly 20 people who live on the Mississippi in Anoka, Coon Rapids, Champlin and Brooklyn Park what they thought of the plan and **none have received a copy**.

What sort of method has the N.P.S. and Commission used to communicate with landowners?

It has failed in the four municipalities mentioned, and the entire process should be stopped until all residents proximate to the river have been properly informed.

Sincerely,

J. Stephen Schmidt
JSS:brh

cc:City of Anoka, Mayor and Council
Governor Arne Carlson
U.S. Congressmen Rod Grams, Jim Ramstad, Martin Sabo, Bruce Vento
Senators Dave Durenberger, Paul Wellstone
State Representative Charles Weaver
Minnesotans for the Mississippi

AUG. 27, 1993

TO SUPERINTEDENT OF THE MISSISSIPPI ATIONAL RIVER AND RECREATION AREA, THE LOWRY BRIDGE SHOULD BE REPLACED AS SOON AS POSSIBLE AS IS DANGEROUS AND ALSO THERE SHOULD BE A PERNAMENT STOP SIGN ISLAND WHERE 2nd ST N. AND WASHINGTON AVE. JOIN TOGETHER AS IS DANGEROUS AND ALSO THERE SHOULD BE MORE STREET LIGHTS ON 2nd ST. N. NORTH OF LOWRY AVE. IN MPLS., MN. AND ALSO MAIL ME A LETTER OF RESPONSE REGARDING DECISIONS.

SINCERELY,
Randy Eric Droher
MR. RANDY ERIC DROHER
[redacted]

THERE ALSO SHOULD ME MORE STREET LIGHTS ON WASHINGTON AVE NORTH OF LOWRY AVE. IN MPLS., MN.

Lyle
CLEMENSON
[redacted]

Superintendent
Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418
Box 41
St. Paul, MN 55101

RE: River Plans

My wife and I have worked all our lives to make our dream place. We are spending thousands of dollars on our homestead. And now we learn that we may to have deal with a bumbling Federal Bureaucracy who will tell us what we can and cannot do with our property.

In July I went to the afternoon meeting at Anoka Tech, I was told many times that the NPS wants only to help us that they were not coming here to dictate. That is a smoke screen. I also attended the evening meeting. I did speak to the fact that we don't want any federal government intervention. My words were not what the panel wanted to hear, but I did get applause from the audience of homeowners present. And several came to me after the meeting, who are too timid to speak up, who definitely do not want the federal government involved.

When I see in plans that say the local government is required to pass local laws to accommodate this plan I know we're in big trouble. Next comes eminent domain so that we at the local level won't have any choice in matters. For the sake of our community let's not have another layer of government to take away our freedom choice. In order for our voice to be heard we would have to go through the local government, then to the DNR and then to Washington. The average person would not be able to be heard without hiring an attorney and wait for long periods of time to get a decision that should be made at the local level. I know that we do not always think alike and get along perfectly, but it does not make sense to have some bureaucrat in Washington make our decisions for us.

We in the state of Minnesota are doing a fine job already (it says so in the plan booklet). Let us have NPS go back to Washington and tell the legislators that we don't need their help. I was to the Brooklyn Park Council Meeting,September 7. The NPS carrot dangled in front of the council was 50% matching funding. Where is the NPS going to get the funds that they are going to give us? Most of their parks are having to cut personnel from lack of funding. The Federal Government is Broke!

NPS LEAVE US ALONE--WE ARE DOING FINE LOCALLY.

CHOOSE ALTERNATE A--NPS DO NOTHING.

Let's believe in our selves! Let us stand on our own and do our own planning and work together to get this done at the local level. The outlined plan is totally within the state of Minnesota. I am sure you have to agree that the federal government, in a situation like ours, cannot do anything that would help us do any more than we can do ourselves.

I believe in what I say so I am volunteering my time to help with this cause to make our river area a better place for all of us. I can be reached at my office at 425-1167 or my home [redacted]

Sincerely,

Lyle Clemenson

My record of community service includes:

Brooklyn Park Planning Commission
Commissioner
North Hennepin Chamber of Commerce
Board of Directors\
Past Chair of Governmental Relations Committee
Chairman Career Advisory Council, Dist. 279
Advisory Council, North Hennepin Community College
Brooklyn Park Business and Community Development Asso.
Board of Directors
Brooklyn Area Youth Center
Board of Directors
Osseo Schools 2000
Board of Directors
Our Saviors Lutheran Church
Past President

ROBERT M. HOGG

[redacted]

5 September 1993

JoAnn M. Kyral
Superintendent
Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418, Box 41
Saint Paul, MN 55101

RE: Draft Comprehensive Management Plan/Environmental Impact Statement for the Mississippi National River and Recreation Area

Dear Superintendent Kyral:

I am a law student at the University of Minnesota and a member of the Save Our Riverfront Campaign. I am pleased to submit the enclosed comments on the Draft Comprehensive Management Plan/Environmental Impact Statement for the Mississippi National River and Recreation Area (MNRRA).

The Save Our Riverfront Campaign is an effort by students, neighbors, faculty, local elected officials, environmental organizations, and other interested citizens to stop the University of Minnesota's current proposal to reconstruct its largely coal-burning heating plant on the east bank of the Mississippi River at the St. Anthony Falls. Since the University's proposed site for its reconstruction falls within the boundaries of the MNRRA (indeed, at a central part of the MNRRA), the Save Our Riverfront Campaign is deeply interested in the MNRRA plan.

Although the MNRRA plan does not address specific sites, the plan could have a significant impact on the regulatory review of the University's proposal. At present the University's proposal is inconsistent with the draft plan, as it should be. For example, its proposed use is a "utilit[y] not requiring a river location" (see page 25) and will violate the plan's architectural guidelines for building location and height near the shoreline (see page 210). There are numerous other inconsistencies between the University's proposal and the draft plan.

The plan should continue to include these restrictions which make the University inconsistent with the plan. However, the plan should be a more forceful statement against unnecessary industrial uses of the riverfront in general. In this way the plan could help neighborhoods and citizens in the Twin Cities enhance the recreational value of the river. While neighborhoods such as Prospect Park East River Road Improvement Association are building park facilities along the river, public institutions like the University should not be rebuilding polluting industrial barriers to recreational development. The plan must help us stop the U's plans.

Specifically, the MNRRA plan should be amended to state:

> **"Industrial riverfront land uses should be removed where a river location is non-essential and where feasible and prudent off-river alternatives exist which would enable the riverfront property to be used for public use and enjoyment."**

This type of policy would bring the MNRRA plan in line with the Minnesota Environmental Policy Act and is especially important for recreational hot spots such as the St. Anthony Falls area, which should showcase recreational use and access to the river.

The National Park Service should recognize how important the MNRRA plan is for the future of the Twin Cities. In an era when central cities are struggling to maintain population and quality of life, the potential value of a great river recreational corridor cannot be underestimated. This plan should provide a vision for the Mississippi River which would dramatically enhance the quality of life for residents and visitors to the Twin Cities. By favoring recreational uses, public enjoyment, urban quality of life, and environmental quality, the MNRRA could attract people to visit, live, and study in Minneapolis and Saint Paul.

The MNRRA, for example, should be a central part of the University's efforts to recruit top-notch students and faculty. In a competitive educational environment, the MNRRA could make the University of Minnesota stand out among institutions of higher education. But unfortunately, on the steam plant issue, the University is ignoring its self-interest. Instead, it has become a leading opponent of recreational reclamation along the riverfront. The University asked the Environmental Quality Board to study alternative industrial uses of the riverfront, which nobody else wanted. The University has emphasized the "working river" aspect of the MNRRA plan to the detriment of recreational opportunities and environmental quality. It is one of the University's most serious black marks that it is taking such a wrong-headed approach on this issue.

The truth is, the University does not understand what a working river is: A "working river" involves river-related commercial uses, like barge traffic and hydroelectric power, not coal-burning heating plants. The MNRRA plan must take care not to grandfather in industries that have been historically exploiting riverfront locations.

I hope this letter and the enclosed comments are helpful to you in finalizing this important plan.

Sincerely,

Robert M. Hogg

Comments on the Draft Comprehensive Management Plan/Environmental Impact Statement for the Mississippi National River and Recreation Area

Robert M. Hogg
Save Our Riverfront Campaign
[redacted]

September 5, 1993

I. Make Recreation and Environmental Quality Top Priorities. The plan lacks a clear vision for the Mississippi River corridor which would significantly enhance the quality of life in the Twin Cities. The plan should signal institutions and governments to make recreation and environmental quality their land use priorities. This vision of recreation and environment is spelled out in the Project History, which states (p. 1-2):

> "Congress directed the commission as a coordinator and advisory organization to assist the secretary, the state of Minnesota, and local units of government, to develop policies and programs for:
>
> "(1) the preservation and enhancement of the environmental values of the area
> "(2) enhanced public outdoor recreation opportunities in the area
> "(3) the conservation and protection of the scenic, historical, cultural, natural, and scientific values of the area
> "(4) the commercial use of the area and its related natural resources, consistent with the protection of the values for which the area was established as the Mississippi National River and Recreation Area."

The plan should also recognize that the MNRRA was established because of growing public interest in the river, based on the excellent recreational opportunities in the corridor. According to the Project History (p. 2):

> "In recent years the river has benefitted from a growing public recognition of the value of this resource. Open space, recreation, and entertainment improvements are drawing people back to its banks in record numbers."

This is the context in which the MNRRA plan is being developed: legislative emphasis on recreation and environment and growing public demand for recreational opportunities in the river corridor. The plan should place a strong emphasis on environmental values and public recreation, whereas commercial uses must be constrained by their "consistency" with other values.

II. Address Inappropriate Existing Industrial Uses. The plan does not adequately address inappropriate existing industrial uses of the riverfront. The plan should be amended to clearly disfavor existing industrial or otherwise polluting land uses which are inconsistent with the recreational and environmental values in the corridor, especially when there are feasible and prudent alternatives. Where the potential for recreational opportunities is highest, the acceptance of existing industrial uses should be lowest.

The plan states (p. 18): "While improvement along the riverfront is desired, this plan should concentrate on new development in the corridor. Existing development should not be substantially changed by the plan." A similar statement is made on p. 20: "The plan recognizes existing development and concentrates on managing new uses . . . " This is a hands-off approach which does not fulfill the legislative purpose described in the Project History.

This hands-off approach to existing facilities also has two other significant shortcomings. First, it means that the plan would have little positive effect in the two urban cities, where existing uses are a much bigger issue than new uses. Second, it protects industrial uses which do not reflect the working river aspect of the MNRRA Act, which is essentially limited to commercial navigation, such as barge transportation, and hydropower. (See pp. 2 and 4) To fulfill the legislation, the MNRRA should only protect river-dependent economic uses, not all existing economic uses. Other existing industrial uses should be managed in a way to remove them from the riverfront or ensure that they have no negative impact on recreational opportunities or environmental quality.

Specific Amendments

- (P. 18) Amend the sixth bullet to say: "Improvement of the riverfront is desired. Industrial riverfront land uses should be removed where a river location is non-essential and where feasible and prudent off-river alternatives exist which would enable the riverfront property to be used for public use and enjoyment." This language would bring the MNRRA plan in line with the substantive standard in the Minnesota Environmental Policy Act.
- (P. 23-24) Amend the fourth sentence in the first paragraph under "Detailed Policies" to say: "Most existing residential, commercial, and industrial development in the corridor would not be significantly changed by this plan so long as the existing development requires a river location or is otherwise consistent with environmental values, recreational opportunities, and the protection of other values for which the area was established ."
- (P. 24) Amend the fifth sentence in the first paragraph under "Location Policies" to say: "This policy would protect many values referenced in the MNRRA act, including existing economic resources which are consistent with environmental values, recreational opportunities, and the protection of other values for which the area was established."
- (P. 48) Add a new bullet: "encourage relocation of riverfront economic uses which do not rely on the river, especially in areas of high visitation or recreational opportunities and where feasible and prudent."

- (P. 12-13) Amend the vision section to state that "continued economic activity" should be "consistent with wise land use management and the values for which the area was established" (p. 12) and should be "encouraged in a manner that does not degrade the natural or cultural resources, recreational opportunities, or environmental values in the area." (p. 13) (underline represents new language).

III. Address Major Facility Modifications and Redevelopment. The plan is unclear whether redevelopment, reconstruction, and rehabilitation projects are considered as existing or new uses. The plan should be amended to treat these types of major modifications as new uses for the purposes of the plan. The National Park Service should strongly encourage redevelopment which is consistent with recreational values and environmental quality.

The economic impact of such redevelopment would be very positive. First, by integrating river concerns into redevelopment planning, dramatic recreational improvements along the riverfront could be accomplished quite economically. It makes no sense to invest millions in industrial riverfront uses when local governments, the state, and the federal government are spending millions to enhance recreational opportunities.

Second, redevelopment which is oriented to quality of life and recreational opportunities will almost certainly be a good source of economic growth and urban revitalization over the next few decades. As the plan states (p. 9): "As water quality improves, recreational facilities and open space along the river will increase in importance." The economic benefits in terms of housing, health, recreational industries, and tourism could be enormous. These issues are particularly important for Minneapolis and Saint Paul as the two cities struggle to attract new residents and to maintain quality of life.

Specific Amendments

- (P. 18) Amend the eighth bullet to say: "New land uses, which include redevelopment, reconstruction, rehabilitation, and other major modifications, should be consistent with recreational opportunities, environmental values, and the other resource and land protection policies articulated in this plan."

- (P. 23-24) Amend the last sentence beginning on p. 23 to say: "The plan would allow businesses and industries in the corridor to expand existing facilities if (a) the business or industry requires a riverfront location, (b) the expansion is consistent with resource protection and site development policies, and (c) the expansion is consistent with long-term environmental quality. If there is a feasible and prudent alternative to the expansion which has a less negative impact on the river corridor, then the alternative should be adopted."

- (P. 23) Amend the first sentence in the first full paragraph to say: "New land use and development . . . . including redevelopment, reconstruction, rehabilitation, and other major modifications, would include those activities . . . ." (underline indicates new language)

- (P. 25) Strike the phrase "however, wholesale redevelopment of the riverfront area is not envisioned." Add new sentences which say: "Wholesale redevelopment is not necessarily appropriate; however, the plan does recognize that there will be special situations in which recreational and environmental values will require large-scale redevelopment and facility relocation. Where there is a feasible and prudent alternative to an existing use which is unrelated to the river or otherwise inconsistent with this plan, relocation will be strongly encouraged. Efforts at relocation will be pursued for riverfront sites which have a high potential for public use and enjoyment."

IV. Provide for a More Prominent National Park Service Role. The checkered record on riverfront planning efforts, such as the critical areas process, is evidence of the need for a more active National Park Service role than called for in the draft plan. As the Project History states (p. 3):

> "[Critical areas] plans and implementation efforts varied, ranging from aggressive land acquisition and trail construction to plans designed to meet the minimum requirements of the legislation. There were a number of problems [with the plans], including lack of funding for coordination and monitoring, lack of implementation, uneven quality of plans and implementation, and minimal enforcement."

The University of Minnesota's critical areas plan, for example, provided for a scenic overlook at its Southeast plant and an east bank trail; however, the University has implemented neither in the fourteen years since it wrote its plan. The Metropolitan Council criticized the University's plan for lack of opportunities for public input, and that could partly explain the failure of the University's plan. The public cannot be expected to ride herd over narrow-minded institutions; the National Park Service should follow up this planning process by forcefully representing recreational concerns.

Specific Amendments

- (P. 18) Amend the fifth bullet to say: "The National Park Service should not necessarily own additional lands under the plan, but riverfront land in areas of potentially high visitor use and recreational opportunity could be acquired by the National Park Service through donation or negotiation, if owner has abandoned or plans to abandon the land."

  Similar language should be added on page 26 in paragraph (3) on inconsistent land uses after the first sentence and on page 33 in the paragraph on "land acquisition concept" after the third sentence.

- (P. 23) Amend paragraph (4) on design guidelines to say: "Design guidelines would be administered at the local level with the support of the National Park Service. . . . The Metropolitan Council, the Minnesota Department of Natural Resources, and the National Park Service would work with communities to further develop these guidelines and apply them to specific areas. The National Park Service would focus on areas with the potential for high visitor use and recreational opportunities."

- (P. 47) Add two new paragraphs at the bottom of the page: "The National Park Service should ensure that existing economic resources in the corridor are consistent with environmental values, recreational opportunities, and other values for which the area was established, especially in areas of potentially high visitor use and recreational development. Where there are feasible and prudent alternatives with less impact on the river corridor, the National Park Service should advocate for the removal of the existing use.

  "The National Park Service should also ensure that redevelopment, reconstruction, and rehabilitation plans and proposals are consistent with the values for which the area was established. Such major modifications to existing resources should be considered as new uses for the purposes of the plan's location and site development policies."

- (P. 48) Amend the eleventh bullet to say: "minimize National Park Service land acquisition except for riverfront lands which have potentially high visitor use and recreational opportunity, if the owner has abandoned or plans to abandon the land."

V. Protect Significant Historical Values Appropriately. Historical facilities are one of the resources for which the area was established. Historical preservation and interpretation should be strongly encouraged where historical values complement recreational and environmental values, although inappropriate uses of historical structures have the potential for conflict with other values in the area. Historical preservation should be prioritized based on the level of interest by the public in a particular facility which will indicate potential for visitor use.

Specific Amendments

- (P. 11) Amend the vision section to: ". . . adaptive reuse of historic structures consistent with protection of natural resources and environmental values in the area." (underlining indicates new language)

- (P. 48) Amend the second bullet to: "protect historical buildings for adaptive reuse which is consistent with environmental quality and recreational opportunities." (underlining indicates new language)

To: Mississippi River Coordinating Commission

From: Douglas Deh

Date: September 3, 1993

Please consider this letter to be part of your written testimony regarding your draft plan for the MNRRA.

I live on the river in the City of Anoka. My comments are as follows:

(1) A specific goal of the plan should be to reduce the high noise and high wakes produced by high-powered speed boats. The boats are dangerous to children (including mine) that wish to float down the river in tubes. Canoeing is also dangerous in this Anoka area. The wakes continue to erode our shoreline. Hauling in rock will only detract from the view of the shore from the river.

(2) The local ordinances already address setbacks from the river, etc. Our local government already cares greatly about maintaining the integrity of the river. A ~~Disasterous~~ fire should not restrict rebuilding.

In summary, the high powered boats are a major issue to be addressed in our area.

August 31, 1993

Dear MNRRA review commission,

I have received and reviewed the summary of the comprehensive management plan and would like the opportunity to make brief comments.

Environmental protection in the proposed plan could be enhanced and strengthened by adoption of Alternative B. The Mississippi is a unique river, largest on the continent, important as a flyway, as a source of human drinking water, and as a dumping ground. Raw sewage due to cities' antiquated sewers and toxins/heavy metals from factories due to less stringent controls flow into this river and cause fish to die, people to experience health problems, birds to decline. The management of the river is not one that bespeaks sustainability. Just look at St. Louis + Baton Rouge, cities without Natl. River and Recreation Area protection. The National Park Service has an opportunity to be a strong role model for other conservation projects if it adopts a strong resource preservation management of the Twin Cities Corridor. Not only does our action near the headwaters of the Mississippi affect - positively or negatively - the area manipulated, but also indirectly affects all our neighbor communities living in the proverbial "backyard" down river.

Plan ahead to be a role model for other cities. Adopt alternative "B" and work toward stewardship of this resource in such a way that sustainability of life and health is championed in such a way that will truly make this metropolitan region unique and on the cutting edge of conservation, with the future - not short-term gain - in focus.

Sincerely,
Chris Arnoldt, Eden Prairie

Partial Bibliography:

Silent Spring, Rachel Carson
Where Have All The Birds Gone?, Terborgh
Better Homes and Gutters
The Christian and the Environment, Cal deWitt

Sept. 3 1993

[redacted]

Superintendent,
Mississippi Nat. River + Rec. Area
175 East Fifth Street, Suite 418
Box 41
St. Paul, Mn. 55101

Dear Superintendent,

I will support equal rights to everyone's usage of the Mississippi River Corridor as follow:

1. Boat traffic through the Coon Rapid dam (both ways) with docking facilities at south end of dam.
2. Fishing piers should be of many on the River Corridor. I am in favor of this governmental agency making it plain to the lawyers that this recreational activity will be available to our Children.
3. Bike and hiking trails (yes) if their is no disruption to permanent residences also Advance rules and laws on restricted behavior.

This attitude of our youth has to be considered (foul language in front of my house will not go) throwing trash down will not go, having a party will not go - I have seen it all and I mean all.

4. It is in the interest of every community along all our water ways to stop erosion. I have not met one governmental Administrator that has the guts to even talk about it. This agency should not follow these very stupid environmental people that say: hey let it flow all the way to the gulf of Mexico. Yes, washing away shore lines, trees and banks. It seems that their brain stopped on: No don't put cement steps, platforms or anything that will reinforce the water way - not giving a damn about the trees, dirt falling and washing to the gulf. I hope the point will be taken for its worth.
5. Our residence rest on the east side of the Mississippi Corridor, there has to be equal treatment of both east and west residences along the river.

6. The driving force to establish this corridor should benefit all citizens equally (our youth, family activity, the many joggers, the dog walkers (of the dogs are chained) bird watchers and etc.

In summation I would like to see residence owners have necessary control of the river (in front or behind their home) to maintain a positive environmental effect. If this agency has intent to make changes that will allow my residence to become a dangerous place, speed zone, a hang out for the disruptive I would like to sell the residence.

This statement will not be understood by many of you but it is very True. We have four Eagles that fly on this river, south of the Coon Rapids dam, many beavers, woodchucks, mink, muskrats, Red fox, deer, Blue herrons, and some unknown. Before the video games came to Northtown Shopping Center and the living rooms of our homes it was not possible for these nature creatures to exist around my neighborhood.

I have witnessed this change on the river, as I have been here since 1968. As I think of what is loss to the youth I see what is gained for the neighborhood and environment. I will make myself available to repeat anything I have said at any time to any one. I would clean up this river and dredge some places out.

Sincerely Yours,
Leonard H. Moore Jr.

Superintendent, Mississippi Nat River &
Rec. Area
Box 41
175 E. 5th St.
St Paul, MN

Dear Sir,

I would favor formal alternative B, emphasizing more resource preservation.

Thank you for your work on this project. My family & I live along the Mississippi and greatly enjoy its natural beauty.

Sincerely,

Mark H. Brakke
[redacted]

September 7, 1993

Superintendent, Mississippi National River and Recreation Area:

I offer the following comments on the Draft Comprehensive Management Plan.

I think it would be a good thing to have some river access points in the wide, Spring Lake stretch of the Mississippi.

The present undeveloped spot at Grey Cloud Island and the steep road, somewhat-developed site at the bottom of the bluffs on the south side of the lake are both difficult and unsafe to use. My car has been vandalized at both sites.

I would very much like to see, in time, and with the cooperation of Sheely Gravel Company, a river access park on Grey Cloud Island.

I would expect that this could be accomplished under the Draft Plan.

Art Vandersteen
[redacted]

Sept. 7, 1993

Dear Ms. Kyral,

I appreciate your efforts to involve the public in your plan review. I have studied the various proposals, and would recommend the adoption of Plan / alternative 'B'. I live close to Mississippi River and have seen significant changes over the last several years. I believe that additional planning needs to be done & include other agencies and their resources.

Good Luck!!

Kevin Gregerson

KEVIN GREGERSON

[redacted]

John R. Swanson
[redacted]

3 September 1993.

Superintendent
Mississippi National River and Recreation area
Saint Paul, Minnesota 55101.

Dear Sir,

Please accept my following Comments concerning the
Draft Comprehensive Management Plan a
Draft Environmental Impact Statement,
Mississippi National River and Recreation Area.

The Mississippi National River and Recreation area contains outstanding scenic wildlife, and recreation resources of certain National significance.

And to fully protect the scenic, wildlife, and cultural attributes of this National area, I urge that the National Park Service add its "veto" authority concerning the plan management and management of this unique and varied area.

establish a national trail plan and program.
so develop an environmental vitality plan and program.
so promote biological diversity in this National area
with preservation conservation at the heart of the area management.
so manage this area as a Natural - Historical Preserve.
So acquire all essential and vital inholdings.
With the actual management of the Mississippi National River and Recreation area to be controlled by the National Park Service.
to assure proper planning and management.
And to fully protect plant and all life.

Sincerely,
John R. Swanson.

John R. Swanson
[redacted]

October 1993

Mississippi National River and Recreation area
P.O. B. 65456
St Paul, Min 55165.

Dear Sirs:

Please accept my following Comments concerning the
Mississippi River Coordinating Commissions Draft plan &
Mississippi National River and Recreation Area.

I urge that all aspects of management of the river
be the sole responsibility of the National Park Service.
with all inholdings, and other lands, acquired by the
National Park Service.

So assure that all local permits be managed - controlled
by the National Park Service.

As the National Park Service must be in complete control
of aspects of the Mississippi National River and
Recreation area, so as to properly manage this important
scenic, wildlife and Historic area.

Sincerely,
John R. Swanson.

August 30, 1973

To: Ministeriam for the Mississippi River:

I have been unable to attend the hearings held by the Mississippi River Coordinating Commission. However, I would like to voice my opinions.

Point number 1: It would seem to me that to restrict landowners in the corridor while allowing St. Paul to deposit its sewage into the river, even though it is treated (and occasionally it is not) is not equal treatment.

Point number 2: True the Mississippi is a beautiful river. The view from the bluffs is spectacular. However, should one landowner be penalized because his neighbor has over built? If the general public, or any group, wishes to restrict land use for any reason, they should be willing to pay for that land on the basis of what three separate appraisers would judge the value of that land to be if used as the owner would have chosen to use it.

Sincerely,
Sally A. Hazard

September 5, 1993

Superintendent
Mississippi National River and Recreation Area
175 East 5th Street
Suite 418, Box 41
St. Paul, MN 55101

re: Mississippi River Coordinating Commission and N.P.S.

Having read the draft summary of the work of the commission we believe the best plan is A, followed by plan C.

There are enough agencies to see to the protection and proper use of the river. In these times of Federal and local budget constraints our tax dollars can be better used in other areas. We do not need another layer of administration to fix what is not broken.

Susan and Abbas Tabibi

Susan Tabibi Abbas Tabibi

[redacted]

Gary Wenisch
[redacted]

August 29, 1993

JoAnn M Kyral: MNRRA

Dear Mrs. Kyral:

I have read the Comprehensive Management Plan/Environmental Impact Draft for the proposed Mississippi National River and Recreation Area; D18 (MISS). I have found the proposal very interesting and exciting, as I am currently involved with Hennepin County Regional Parks' ADA accessibility study and implementation.

I have a background in park and recreation and environmental education, and since a diving accident in 1978, a disabled user of the park system. I have found the local area to be rich in both culture and resources. Our park and trail systems are a proud example of the balance of natural resource preservation and human use.

I was reminded of this delicate balance while visiting the Fort Snelling area. While reviewing the trails around the Mendota Bridge, I stopped and chatted with a fisherman on the Minnesota river. He landed a 18+ pound northern pike. After I took a picture of his catch for him, he released the fish, and talked of the hope of a cleaner river. An hour later, I was talking to a man organizing the setup of the annual week long American Indian Movement campment. The teepees being raised on the grounds below the hammering of bridge construction, combined with the overhead jet traffic was an environment to ponder. To make one think of past and present, and a reminder of our need to preserve in the path of progress.

I have enclosed some brief notes on the proposed corridor. I do not have extensive knowledge of the feasibility of easement development, but I am familiar with all the trails and facilities from the Coon Rapids Dam through Fort Snelling. I believe with dedicated federal, state, county and local involvement, a continuous trail can be achieved. I also believe a limited recreational emphasis would be prefered for less impact on the environment. By limited I refer to emphasis on trails, fishing piers, scenic overlooks, signage/interpretive stations and environmentally friendly restrooms/areas were needed.

I would like to be involved in the progress of the proposed park and will offer my knowledge of the existing trails and facilities with an insight of an environment for young and old to enjoy.

Sincerely,

Gary Wenisch

enc.

The proposed plan of a continuous trail along or near the river will be feasable with cooperation of local existing trails and future development plans of these communities. The northern stretch of the river would be the the exception. The comprehensive regional trail plan will be instrumental in achieving the needed cooperation for this project. I assume the funding for this will not be a large obstacle for the project.

In general, I agree with the proposed plan of NPS involvement in the effort to provide additional pedestrian and bicycle paths, aquiring abandoned rail road for trail/open space needs, and continued use of existing marinas and river access sites. I do not however, foresee the development of new marinas or large visitor recreational facilities as an attraction for tourists. Theses may be more of an environmental intrusion than an attracting feature of the corridor.

The (ROS) recreation opportunity spectrum, may be used to measure recreational activities available in the proposed corridor. But because of the varied setting within the corridor, urban to semi-primitive, recreational activities vary widely. And the management approach to establish a particular framework defining recreational needs and opportunities in one specific area of the corridor will not be consistant with other areas. This should be considered in the overall plan, since some areas within the corridor will offer or even demand a different recreational experience.

Commercial navigation uses based on the desired balances listed in the proposal and reviewed by Corps of Engineers and DNR for conformity, should take into account general water quality. Under the proposed plan would NPS monitoring be more stringent than existing water quality standards? Or would existing local water quality standards be used as a measure. Other forms of impact such as noise pollution would be at a minimum if plans such as alternative #C are avoided.

The proposal did not specify particulars of it's impact on the private sector. I would assume business as well as individual land owners each have their interests to protect. Just as a more highly developed recreationally oriented plan may enhance the opportunitities of some businesses, the homeowner may see this as an intrusion. The environmentalist as a scorn. Emphasis on a continuous coordinated effort on all levels of government and private sectors is essential to the success of this plan.

In conclusion, I feel the proposed plan will benefit both the environment and the opportunities it has to offer. I however, am sincerely concerned with the rather 'high profile' plans of the NPS interpretive center. No monies have been allocated for an interpretive center at Fort Snelling, although plans are underway for such development. The other centers, using existing facilities seem fine for the purpose of interpretation. But could the center at Harriet Island be scaled down, and unspent monies go elsewhere in the corridor? Will the interpretive materials at the center be 'user friendly', or on a scale geared for the more intellectual tourist? The center will host a large minority population. Will they have the opportunity to participate in the environmental interpretive process? And will the displays be on a level that is understood by school-age visitors and minorities with limited cultural and linguistic knowledge? These questions/concerns were expressed by various individuals and professionals in the environmental education field.

Concerning the ADA compliance of the proposed center, trails, interpretation and other facilities, I assume such references as the Design Guide for Universal Access to Outdoor Recreation and other currently published materials

have been [illegible]

James E. Hard
[redacted]

Sept. 6, 1993

JoAnn M. Kryal, Superintendent
Mississippi National River & Recreation Area
175 East Fifth Street, Suite 418
Box 41
St. Paul, MN 55101

Dear Ms. Kryal:

Having just received the draft comprehensive management plan/DEIS for the MNRRA, I would like to make a few comments on it before the end of the comment period, which is September 10.

The report notes that the affected environment includes exotic plants such as Eurasian watermilfoil and purple loosestrife, and threatened and endangered species such as the Higgins eye mussel and the Uncas Skipper(whatever that is). Also included in the report are discussions of the benefits to visitors to MNRRA and what business owners "of an inconsistent land use" can do if they wish to move away, but nowhere in the document do I see an analysis of the environmental impact on the current residents of these areas! Since there are about 300 of us living in Grey Cloud Island Township, and since from what I can see in the report, you have not even mentioned our existence, what can we conclude from this omission? Was it deliberate? Are the opinions of those of us who live here and who would be affected by MNRRA not important? I believe that MNRRA owes us a very detailed explanation. Unsupported statements such as "Additional recreational use in the corridor would cause increases in noise; however, these would be insignificant, especially when compared to the existing background noise in a large urban area." are not very meaningful in a township where the loudest noise on some days is the honking of Canada geese 10 yards up! Or, how about impacts relating to visitor use, "Increased personal accountability should result in reduced levels of vandalism and other destructive behavior, and increased citizen monitoring of environmental and social conditions." At a time in Minnesota history where Park Rangers are being shot only because they are doing their jobs and where a walk in Minnehaha Park at any time of day becomes a lesson in jungle survival, to say that we will be safer with MNRRA is a ludicrous statement.

For all of these reasons and many more, and since the residents of Grey Cloud Island Township have not even been given the courtesy of a briefing by the MNRRA planners before the end of comment period, I conclude that in my opinion the appropriate action to be taken is that described in Alternative A(No Action). We can manage very well without MNRRA, thank you!

Sincerely,
James E. Hard

J. E. Hard

THOMAS C. KAYSER
[redacted]

September 8, 1993

Mississippi River Coordinating Commission
National Park Service
Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418
Box 41
Saint Paul, Minnesota 55101

Ladies and Gentlemen of the Commission:

I have lived at the above address for almost 23 years and have been active in a variety of matters that affect the Mississippi River Boulevard in Saint Paul.

I recently received a draft copy of the Comprehensive Management Plan and Environmental Impact Statement published by the Commission. I also recently had the opportunity to meet with Ms. JoAnn M. Kyral and Mr. R. Michael Madell. They were extremely helpful in clarifying for me and one of my neighbors various issues that were of concern to us relative to the impact of the draft plan on our neighborhood. We are most appreciative of the assistance given to us by both of them.

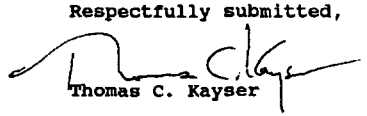
While I understand there was publicity given to the meetings of the Commission, neither I nor other neighbors who have been involved in Mississippi River Boulevard matters had any idea that those meetings were, in fact, taking place. I am concerned that the Commission has not had the benefit of an exchange of views with the people who might be affected by this plan living on both sides of the Mississippi River in Minneapolis and Saint Paul. To the extent that we are affected by anything that is finally passed by this Commission, I think we deserve to be consulted prior to its happening.

I would suggest that there be some opportunity for either the Commission or a subcommittee thereof to meet with residents living along the Mississippi River in both cities and fully explain the impact of this plan on their properties. In addition, it would probably also be useful to fully develop the interaction between

the federal government and local governments affecting not only the Mississippi River in that area but the streets on either side of the river in the Twin Cities. In other words, if the City of Minneapolis or Saint Paul wishes to do something on the River Boulevard in their respective cities that conflicts in some fashion with this management plan, who prevails?

I appreciate your consideration of these matters.

Respectfully submitted,



Thomas C. Kayser

TCK:blg

cc: Ms. Nancy Kapps

Mickman Brothers

Quality Wreaths Since 1934

9-6-93

To Whom it may concern:

I live at 1168 Benton street in anoka. I purchased the property 4 years ago and because of the location and my 150 feet on the river I paid a premium price for the property.

I understand that there is a possibility that there might be a trail built right in my back yard that will infringe on my right to enjoy my property and lower my property value. I want to go on record saying that I oppose this plan and I do not want my enjoyment of my property or property value to suffer. Thank you for your time.

Sincerely,

Chris Mickman

[redacted]

[redacted]

Dennis L. Potter

[redacted]

September 7, 1993

Superintendent
Mississippi National River and Recreation Area
175 East 5th Street
Suite 418, Box 41
St. Paul, Mn 55101

re: Mississippi River Coordinating Commission and N.P.S.

I am a 40+ year resident of the Anoka area and have lived on the Mississippi River for nearly 14 years.

I believe the best and more desirable plan is Alternative A, followed by Alternative C. My comments apply to that portion of the river I know best, namely up river from the Coon Rapids Dam to Dayton.

We have sufficient regulatory bodies involved with the river - let them acquire park land, regulate river front area land use, and promote greater use of the river resource.

I have great concerns for the lack of details in the plan and feel that local bodies can more effectively deal with related river issues in my area. I see no need for interpretive and administrative facilities in the Twin Cities.

Sincerely,

Dennis L. Potter

Ronald J. & Ruth B. Jelinek
[redacted]

September 8, 1993

Superintendent
Mississippi National River & Recreation Area
175 E. 5th St
Box 41
St. Paul, MN 55101

Dear Sir:

We are Mississippi property owners concerned about the proposed plan to further regulate land and water usage along the shoreline of this river. We believe that the local zoning boards and DNR are more than adequate to this task and that further regulation will only make the system more unwieldy and insensitive to the needs and rights of tax-paying landowners/users along the river.

As I understand it, the proposed plan lacks specifics regarding whose land will be grabbed and what the compensation will be-- if any. It also lacks specifics regarding whom will have the final say insofar as any land use permits are concerned. As it is now, we have two layers of regulators to deal with-- and they can be very inflexible, restrictive, and expensive-- believe us .We do not need further regulation but if it is inevitable we would at least like to know how it is going to affect our own usage of this property and it's market value. We would appreciate your consideration in this very important matter.

Sincerely,

Ronald J. Jelinek and Ruth B. Jelinek

cc: Governor Carlson

Erling Dokken
[redacted]

September 8, 1993

Superintendent
Mississippi National River
and Recreation Area
Suite 418, Box 41
175 East Fifth Street
St. Paul, MN 55101

Dear Lady or Gentleman:

I am a homeowner living on property located within the 72 mile Mississippi River corridor which is the subject of a comprehensive management plan. I recently became aware of this plan and would like to submit the following written testimony regarding it:

- I support stewardship of the river - but I believe, however, that this process is best controlled at the local level.

  Management of the river has been in the hands of local government for many years. They have done a creditable job in its preservation as witnessed by the number of people who choose to live on its banks and the even greater number who use it for recreational purposes. It seems to me that the "System Ain't Broke" and adding additional supervision to this process is costly and unnecessary. Supervision of this resource by local government, the Minnesota Department of Natural Resources and The Corps of Engineers provides ample opportunity to implement development and conservation of this corridor. Superimpose on this, today's informed citizenry and I am quite certain that an appropriate balance of environmental and economic concerns can be achieved.

- The plan calls for land acquisition within the corridor - but does not describe the process.

  The draft plan recites an intention to acquire land along the corridor. Which land is intended for acquisition? What procedures will be in place to determine economic value of land to be acquired? How will land owners be compensated? There are no descriptions of how these situations will be dealt with in the plan draft and as a homeowner I have concerns about these matters. The plan should be expanded to provide adequate clarification concerning these matters.

- My interpretation of the plan is such that it gives the Park Service veto authority over local ordinances.

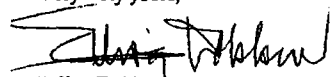
  This authority adds another layer of government to an already complicated process and undoubtedly will make it even more difficult for land owners to make modifications to their own property. Further, the draft does not provide for any appeals process in these matters.

- Consider expansion of your mailing list in connection with this plan.

  As a resident and owner of property within the effected corridor, I came to an awareness of this draft in a second hand fashion. I would suggest that the Department's mailing list be expanded to include persons effected by these plans.

Thank you very much for the opportunity to testify.

Very truly yours,



Erling Dokken

ED/mjp

Attn. Superintendent, MNRRA; September 6, 1993

As a citizen of Minnesota and one who lives near the Mississippi, I would like to offer the following comments on the MNRRA Draft Plan.

First, of the alternatives proposed, I favor alternative B and, in general, support the viewpoint expressed by Citizens for a Better Environment.

Please consider the following additional opinions:

(1) Using language that conveys a distinction between what is good for the economy and what is good for the environment is misleading. Ultimately, what serves to protect the natural environment is in the best interests of the state's economy, and certainly its quality of life.

(2) Increasing public use of the corridor is not necessarily a guaranteed "good." The desired level of use should correspond to that limit which is necessary, in the view of ecologists, to preserve the integrity of the natural communities along the riverway.

(3) Please strengthen the language of the plan. Make clear such phrases as "where practical." If every reference to habitat/wetland/water quality protection includes the words "where practical" the plan is meaningless and unenforceable. Be honest. Either there are clear measureable guidelines, or there is nothing but lip service.

Also along the lines of language, please review the use of the word "appearance", e.g. "restoration of the shoreline to a natural appearance." We should be more concerned with the actual health of the shoreline's natural communities, rather than creating a facade that "appears" natural.

(1) (over)

(4) Specifically how would the guidelines of MNRRA be enforced? How would individuals and corporations be held accountable? This process should be described in detail in the plan.

(5) Please evaluate the impact of a contiguous trail system that runs the full length of the corridor, as to whether such an unbroken system is in the best interests of wildlife. There may well be need for areas along the corridor where a trail would be inappropriate, ex. in an area utilized as eagle roosts. This aspect of the plan should be evaluated for its specific impact on habitat areas along the river. Perhaps a trail could be re-routed away from the river in sections where it is desirable to view the land as a wildlife sanctuary.

(6) I would suggest that zones be established to identify the relative protection granted to different areas, ranging from complete protection to areas that could withstand greater use/development.

Centuries from now, if we have managed to preserve and improve the quality of this riverway, it will be perceived as an act of unprecedented development of human wisdom. That is precisely the kind of development that I urge you to place as a priority in this plan and its enforcement.

Thank you for your consideration.

Louise Allman
Eyota, MN

(2)

MNRRA Comment Sheet

Name: Ch Burnett

Group/ Company: (If Any) Renewable Energy Activist

Address: [redacted]

City/State zip

Comments

In Minneapolis this project is basically about this history of hydropower yet I find not one word about your views on redeveloping hydropower in this area. Minnesota has the largest + 2nd largest retired hydros in America which are both in this project. Our Country has a humongous deficit crisis and you would propose and borrow money for this? I watch 20,000 dollars of hydropower go to waste everyday - The grand total (Retail) of hydropower created at Coon Rapids + Lower St Anthony Falls is over 100 million dollars. What are your positions on hydropower?

-over-

National Park Service
Mississippi National River & Recreation Area
Galtier Plaza, Suite 418, Box 41
St. Paul, MN 55101-2901

(612) 290-4160

Superintendent
Miss. National River + Rec. Area
175 East Fifth St. Suite 418
Box 41
St. Paul. MN, 55101

Dear Sir;

I have lived on the Mississippi River for three years now + I love the Natural beauty of the area. My concerns & the future are as follows.-

1. I will eventually Not be able to afford the taxes along with the increases and will be forced to move.

2. I feel the local citizens and local government should control and legislate the future of the Area. I do not believe the DNR. or another branch of Government should have veto power to any changes the citizens + local government approve of.

3. I feel Private ownership of Riverfront property should always be a choice. Public park property along the River is wonderful and I have never objected to the view of the Homes on the River. I think we can share the river, public + private ownership is best.

William R. Kenney
[redacted]

9-6-93

476

September 2, 1993

Superintendent
Mississippi National River and Recreation Area
175 East Fifth Street
Suite 418, Box 41
St. Paul, MN 55101

Dear Superintendent

I wish to comment on the proposed draft of the comprehensive management plan for the MNRRA. As a resident of Minneapolis and a frequent user of the Mississippi river I have a dream that some day in the near future I will be able to take my two children to a beach on the Mississippi river and go swimming. I live a less than two blocks from the river and every day I look at it like a beach, but I know what a waste.

In the past industry and progress were the rule with little knowledge or apathy of the problems of pollution. We understand a little more these days and have the technology to clean our factories from polluting the river. At this point it is not a matter of economics, it is a matter of dollars and cents.

I want a river that is fishable, swimmable, and a pleasure to be around. I will spend more for this through taxes, higher priced goods (like electricity) because I value a cleaner environment over a higher income.

I hope you will choose your Alternative B management plan. If you don't choose Alternative B, stay with the plan we are currently enforcing, do not go with Alternative C.

Thank you for your consideration of my comments.

In cooperation,

Tim Dietz
[redacted]

September 7, 1993

Steven M Begich
[redacted]

Superintendent
Mississippi National River and Recreation Area
175 East 5th Street, Suite #418
Box 41
St. Paul, Minnesota 55101

Dear Superintendent:

I love the Mississippi and want to keep it clean and natural. I want the river to be used by the people of the United States and Minnesota for both commercial and residential purposes. I am writing as a concerned citizen about the comprehensive management plan/draft environmental impact statement for the Mississippi River corridor from Dayton to Hastings.

I am a home owner along the river, and it is very unclear what improvements or additions I could make to my existing home or property from your draft. I am concerned, as a residential property owner that I will be unable to make improvements to my property because of these new proposed regulations. I believe that there must be some assurances that property owners who presently own homes along the Mississippi river be allowed to continue to use their property as it was initially intended when they purchased that property.

It is unclear from the draft whether home owners will be allowed to make changes to their property because they would not comply with the proposed plan, but would comply with present local zoning rules. This would inhibit the property owners from expanding their homes to meet the needs of their families, as was initially planned when the property was purchased. The plan would seem to restrict the building or replacing of retaining walls that prevent erosion and protect property.

It is because of these concerns that I strongly recommend that the local communities have primary control and local governance over the river way. I recommend that all present owners be allowed to continue to function under the current zoning rules. If newer more restictive rules are adopted then they would go into affect after the property is sold.

Please keep me informed of the progress of this proposal. I would like a copy of the final plan.

Sincerely,

Steven Begich

JENSEN, HICKEN, GEDDE & SCOTT, P. A.
ATTORNEYS AND COUNSELORS AT LAW

BOCK, EDWARD A., JR.*
GEDDE, THOMAS A.
HICKEN, JEFFREY P.**
HOWARD, ROBERT A.
JENSEN, DAVID L.
MATTKE, PAUL R.
SCOTT, MICHAEL J.
THOMPSON, BETH S.

[redacted]

* REAL PROPERTY SPECIALIST CERTIFIED BY MINNESOTA STATE BAR ASSOCIATION
** FELLOW OF THE AMERICAN ACADEMY OF MATRIMONIAL LAWYERS

September 8, 1993

Superintendent
Mississippi National River and Recreation Area
175 East 5th Street
Suite 418, Box 41
St. Paul, MN 55101

RE: Mississippi River Coordinating Commission and N.P.S.

Dear Sir or Madam:

My family has lived on the shore of the Mississippi River in the City of Anoka for twenty one years. During this time we have enjoyed the recreational and natural features of the river and also have paid substantial real estate taxes for the enhanced value of our property because of its location.

Now I learn that there have been plans proposed that would drastically alter and diminish the benefit for which we have paid for so dearly, and have enjoyed for so many years.

After having reviewed the draft "Alternatives Summary by Issue", I would recommend that the Agency adopt Alternative A. A reluctant second choice would be Alternative C. Any other alternative would impact severely on the thousands of people who lose the opportunities provided by the river as it is, not to mention the drastic effect on their property values.

Be assured that we, along with countless others, will pursue this goal to the limit. Thank you for your consideration.

Yours very truly,

JENSEN, HICKEN, GEDDE & SCOTT, P.A.

Jeffrey P. Hicken

JPH:jph

cc: Mark Nagel
Anoka City Manager

Harley Jensen
Dennis Wood,

RAMSHORN
CONSTRUCTION INC

Professional Design and
Quality Craftsmanship

7 Sept. 1993

Superintendent
Mississippi National River & Recreation Area
175 East Fifth Street, Suite 418, Box 41
St. Paul, Minnesota 55101

Atten; JoAnn M. Kyral

This letter is in response to our telephone conversation of August 26, 1993, regarding the proposed 72-mile development plan for the Mississippi river. At that time I informed you of the fact that I am an ajacent property owner and that I have an invested interest in this project. I also mentioned to you that I had developed a proposed design study for the Lake Street Bridge Replacement Project.

I have enclosed a copy of that study for your review. My original position was that I was not inclined to support a vehicular underpass for West River Parkway traffic. However, after further study by the Minneapolis Park Board and through their communications with the neighborhood community, I decided to support the proposal.

I have reviewed the Commission's plan/draft that you sent to me, and I do not believe that I have any major objections to this proposal. I may add that I also speak as a retired, professional architectural designer; employed as a senior project designer with a local architectural firm.

However, I do have one major concern about adjacent property development. My property taxes escalated upwards dramatically this year, and I have begun to wonder if I am being asked to pay for more than my share of your project. With what little knowledge I have about other cities in the U.S., I have observed that high property taxes along the rivers have resulted in expensive high-rise developent, since that is the only way to support the excessive tax rate. I also observed in your study somewhere that you did not want the same thing to happen here, however, I did not see any solution to the problem. May I suggest that your office recommend that low-rise development be allowed along the river corridor, and/or multiple dwellings of two to four units. This action could assist me in obtaining spot zoning for a duplex unit on my lot, otherwise this lot will not be able to support future tax rates.

Another concern that I have, is that your study suggested that any future bridges over the Mississippi be stone arch bridges if at all possible. As a professional designer, may I suggest that this approach would be rather rigid and limiting to a very creative designer. With that kind of thinking, it would never have been possible for the U.S. to have put men on the moon. My enclosed Lake Street Bridge proposal is an example in kind. It was not intended to be a final solution, but a very creative possibility.

My own personal taste and opinion is that the original Lake Street Bridge was a rather elegant, steel lattice structure. Some people even proposed that it be placed in the National Register of Historic Structures. As an architect, I loved it so much, that I took several stereographic slides of it before it was demolished. Who is to say that a stone arch bridge is more beautiful than a steel lattice structure? The answer to that question is obvious. It should be decided by someone who is a multidisciplinarian who is experienced in several fields of creativity, of which I am one. Do I have something against stone arch bridges? No, of course not. The secret is in knowing when to use one over the other, without excluding other possibilities.

I wish you the best in your exciting poject.

Sincerely,

H.R. Jensen

Harley R. Jensen

COMMENTS

JULY 7TH, 1980

SUBJECT: PROPOSED LAKE STREET BRIDGE REPLACEMENT AND ALTERATIONS TO WEST RIVER PARKWAY.

TO: ALDERMAN 2ND WARD, JUDY M. CORRAO; STATE REPRESENTATIVE, DONNA PETERSON; HENNEPIN COUNTY COMMISSIONER, JEFF SPARTZ; MINNESOTA DEPARTMENT OF TRANSPORTATION; MINNEAPOLIS PARK AND RECREATION BOARD; MINNEAPOLIS PUBLIC WORKS DEPARTMENT.

NEIGHBORHOOD MEETING OF JULY 9, 1980, OF 7 P.M. AT ST. ALBERT'S CHURCH, 2833 32ND AVE. SO., MPLS., MN.

FROM: HARLEY R. JENSEN, FREE LANCE ARCHITECTURAL DESIGN CONSULTANT

[redacted]

RE: A VIABLE ALTERNATIVE.

TO WHOM IT MAY CONCERN;

FIRST OF ALL, I WOULD LIKE TO STATE THAT IT IS NOT MY INTENTION TO TAKE AN ADVERSARIAL ROLE IN THIS PROJECT, BUT ONLY TO ADVANCE SOME CONSTRUCTIVE THOUGHTS ON THE MATTER.

IT IS IN MY OPINION, THAT THE PROPOSED NEW LAKE STREET BRIDGE SHOULD NOT BE CONSIDERED AS JUST ANOTHER BRIDGE REPLACEMENT. I BELIEVE THERE ARE TOO MANY INTERRELATED FACTORS INVOLVED THAT CAN HAVE A DEFINITE INFLUENCE UPON IT'S FINAL DESIGN SOLUTION. I WILL TRY TO STATE THESE CONCERNS CLEARLY, BUT NOT NECESSARILY IN THEIR RELATIVE ORDER OF IMPORTANCE.

ITEM 1. ONE IMPORTANT CONSIDERATION IS THE REQUIRED MOTOR VEHICLE ACCESS TO THE MPLS. ROWING CLUB AND THE MPLS. SANITARY SEWER PUMPING STATION. BOTH OF THESE STRUCTURES ARE LOCATED ON THE RIVER FLATS JUST NORTH OF THE PRESENT BRIDGE. NOW FOR THE EXISTING VEHICLE ENTRANCE AND ACCESS ROAD TO REMAIN AT IT'S PRESENT LOCATION, AT THE VERY INTERSECTION OF LAKE STREET AND WEST RIVER PARKWAY, IS TOTALLY UNACCEPTABLE FROM A TRAFFIC STANDPOINT. (SEE EXHIBIT 'D')

I BELIEVE A REASONABLE ALTERNATIVE OR SOLUTION WOULD BE TO RELOCATE THIS ENTRANCE WITH A NEW ACCESS ROAD TO THE SOUTH SIDE OF LAKE STREET COMING OFF OF THE PARKWAY. THIS ACCESS ROAD OR RAMP WOULD BEGIN AT A MUCH LOWER EXISTING ELEVATION; SOMEWHERE NEAR THE BOUNDARY LINE BETWEEN MINNEHAHA ACADEMY AND THE DANEBO HOME PROPERTY. THIS ROAD WOULD THEN RUN NORTH UNDER THE EXTREME WEST END OF THE NEW BRIDGE TO SERVICE THE ROWING CLUB AND THE PUMPING STATION. THIS SOLUTION MAY ALSO ELIMINATE THE SHARP AND NEAR IMPOSSIBLE HORSESHOE TURN ON THE EXISTING ROAD. IT WOULD FACILITATE THE EASY DELIVERY AND PARKING OF THE EXTREMELY LONG BOAT TRAILERS HAULING THE VERY DELICATE ROWING SHELLS TO THE CLUB'S LAUNCHING SITE.

IT SHOULD BE POINTED OUT THAT THIS NEW ROAD SHOULD NOT BE CONSIDERED AN EXPENSIVE GIFT TO A SPECIAL INTEREST GROUP BECAUSE OF THE VERY PRESENT NEED FOR VEHICLE ACCESS TO THE PUMPING STATION ITSELF AND ALSO FOR POLICE VEHICLES AND POSSIBLY LONG LADDER FIRE TRUCKS.

7 SEPT 1993. A LONG LADDER FIRE TRUCK ATTEMPTED TO ACCESS THE NEW SERVICE ROAD TO THE ROWING CLUB ONE TO TWO MONTHS AGO, IN ORDER TO ATTEND TO A FIRE AT THE ROWING CLUB – IT WAS UNABLE TO DO SO, BECAUSE OF FAULTY DESIGN OF THE ROADWAY IT COULD NOT MANEUVER THE SHARP TURN OFF THE PARKWAY UNDERPASS ROADWAY, THE MPLS. PARK BOARD HAD

ITEM 2. NOW IF THIS CONCEPT SOUNDS REASONABLE AND ACCEPTABLE, IT WILL THEN SOLVE ONE LAKE STREET INTERSECTION PROBLEM, BUT IT WILL ALSO REQUIRE AN UNDERPASS UNDER THE EXTREME WEST END OF THE NEW BRIDGE. THIS MAY OR MAY NOT REQUIRE THE BRIDGE ITSELF TO BECOME SOMEWHAT LONGER.

ITEM 3. WITH THE ACCEPTANCE OF THIS NEW UNDERPASS ROAD FROM THE SOUTH; IT NOW BRINGS UP THE QUESTION OF WHETHER OR NOT TO EXTEND THIS NEW ROAD NORTHWARD AND BACK UP THE RIVER BANK TO TIE BACK INTO THE EXISTING WEST RIVER PARKWAY. THIS WOULD THEN HAVE THE EFFECT OF SEPARATING THE WEST RIVER PARKWAY CROSSOVER TRAFFIC FROM THE LAKE STREET INTERSECTION, AS HAS BEEN SUGGESTED IN ALDERMAN CORRAO'S LETTER OF JUNE 17, 1980, TO THE NEIGHBORHOOD.

IF THE DECISION IS TO ACCEPT THIS UNDERPASS ROAD EXTENTION IT WOULD THEN BRING UP THE QUESTION OF JUST EXACTLY WHERE THIS NEW ROAD SHOULD TIE BACK INTO WEST RIVER PARKWAY ON THE NORTH SIDE OF LAKE STREET.

PERMIT ME NOW TO SUGGEST THAT THERE MAY NOT BE ONE RESIDENT IN THIS AREA THAT WOULD WANT THAT NEW RAMP ENTRANCE RIGHT IN FRONT OF HIS OR HER OWN PERSONAL HOME, WITH MYSELF INCLUDED.

I HAVE PERSONALLY LIVED IN THIS AREA FOR THE PAST TWENTY YEARS APPROXIMATELY. I SAW WHAT WAS DONE ON THE EAST END OF THE EXISTING BRIDGE IN SAINT PAUL WHERE ALL THE TREES WERE INDESCRIMINATELY REMOVED AND A TASTELESS DEVELOPMENT FORCIBLY IMPOSED UPON THE LANDSCAPE WITHOUT ANY REAL AESTHETIC CONSIDERATIONS INCORPORATED INTO THE FINAL SOLUTION. WE DO ADMIT THOUGH, THERE WAS A VERY APPARENT AND REAL NEED FOR BUILDING THIS UNDERPASS UNDER THE BRIDGE IN SAINT PAUL. AUTO AND BUS TRAFFIC WOULD BECOME BLOCKED ON THE HILL, ADJACENT TO THE GOLF CLUB, IN THE WINTER WITH EACH NEW SNOWFALL. TRAFFIC WOULD BACK UP ACROSS THE BRIDGE AND THEN SOMETIMES EVEN FOR ANOTHER SIX OR SEVEN BLOCKS INTO MINNEAPOLIS. NOW ON THE WEST END OF THE BRIDGE I DO NOT BELIEVE WE HAVE THAT KIND OF A MAJOR PROBLEM, AND THEREFORE MAY NOT HAVE THE NEED FOR THE TOTAL MOTORIZED VEHICLE UNDERPASS ROAD.

IT ALSO APPEARS FROM PAST HISTORY, AND FROM OTHER COMPLETED PARK BOARD PROJECTS, THAT THE PARK BOARD HAS A LONG STANDING POLICY OF WANTING TO DISCOURAGE MOTORIZED TRAFFIC FROM THE USE OF THE PARKWAY IN DEFERENCE TO JOGGERS AND BIKES. I DO NOT HAVE ANY MAJOR OBJECTIONS TO THAT KIND OF A POLICY, BUT TO NOW SUGGEST OR ENCOURAGE THE CONSTRUCTION OF A CONTINUOUS MOTORIZED VEHICLE ROADWAY UNDER THE WEST END OF THE NEW BRIDGE WOULD NOT SEEM TO BE CONSISTANT WITH THE FORMER POLICY OF DISCOURAGEMENT TO VEHICLES.

ON OCCASIONS WEST RIVER ROAD HAS BEEN BLOCKED OFF TO ALL MOTORIZED TRAFFIC FOR THE PURPOSE OF WALK-A-THONS AND BIKE-A-THONS. NOW IF IT IS THE DEPARTMENT'S DESIRE TO ELIMINATE THE PROBLEM OF THIS KIND OF PEOPLE TRAFFIC FROM CROSSING OVER THE LAKE STREET VEHICLE TRAFFIC, THEN I THINK THE PEOPLE OF THIS AREA COULD SUPPORT THE CONSTRUCTION OF A CONTINUOUS PEDESTRIAN AND BIKE PATHWAY RUNNING UNDER THIS END OF THE NEW BRIDGE, BUT NOT FOR MOTOR VEHICLES.

NOW IF A CONTINUOUS PEDESTRIAN AND BIKE PATHWAY IS BUILT, THEN I BELIEVE A GREAT DEAL OF CARE SHOULD BE TAKEN SO AS TO NOT END UP WITH A MAJOR BREAK IN THE EXISTING TREE LINE ON THE PARKWAY, NOR TO REMOVE A GREAT AMOUNT OF TREES ANYWHERE FOR THIS TOTAL PROJECT. IT CAN BE ARGUED THAT YOU CAN ALWAYS PLANT NEW TREES, WHICH IS TRUE, BUT IT ALSO MUST BE SAID THAT IT TAKES 40 OR 50 YEARS FOR THOSE TREES TO MATURE.

LET ME STATE ANOTHER FACT HERE, MINNEAPOLIS IS NOT SAINT PAUL. BASICALLY ON THE EAST END OF THE BRIDGE YOU HAVE THE BACKSIDE OF A GOLF CLUB BUILDING FACING THE RIVER, A PARKING LOT, AND AN OLDER APARTMENT BUILDING WITH LITTLE ATTRACTIVE LANDSCAPING. ON THE MINNEAPOLIS SIDE YOU HAVE A NEWER, ATTRACTIVE APARTMENT BUILDING WITH GOOD LANDSCAPING, THE STANDARD OIL STATION, AND THEN ATTRACTIVE, WELL CARED FOR RESIDENCES. MAY I SUGGEST THAT WHEN THIS BRIDGE PROJECT IS DONE THAT WE WILL HAVE AN AREA THAT IS EVEN MORE ATTRACTIVE THAN IT IS NOW!

ITEM 4. NOW IF THE SOURCE OF MY INFORMATION IS CORRECT, WHICH I RECIEVED ABOUT A YEAR AGO, IT APPEARS THAT THE BEST WAY TO BUILD THIS NEW BRIDGE WOULD BE TO CONSTRUCT IT RIGHT ALONGSIDE ON THE NORTH SIDE OF THE EXISTING BRIDGE. THIS WOULD BE DONE IN ORDER TO HAVE CONTINUOUS BRIDGE AVAILABILITY ACROSS THE RIVER. NOW THIS WOULD NECESSITATE THE REALIGNMENT OF THE CENTER-LINES OF LAKE STREET AND MARSHALL AVENUE RESPECTIVELY. THIS REALIGNMENT WOULD REQUIRE THE REMOVAL OF THE STANDARD OIL STATION IN MINNEAPOLIS AND THE TAKING OF PART OF THE GOLF CLUB'S PARKING LOT IN SAINT PAUL.

THERE ARE SOME PEOPLE WHO MAY NOT OBJECT TO THE LOSS OF THE OIL STATION SINCE IT MAY ALSO OFFER THE OPPORTUNITY OF DEVELOPING A MORE "PARK-LIKE" CHARACTER TO THIS END OF THE BRIDGE, BUT THERE ARE OTHERS WHO FEEL VERY STRONGLY THAT THE AREA WOULD BE HURT AESTHETICALLY WITH THIS PROPOSED JOG IN ALIGNMENT AND WOULD PREFER THAT THE NEW BRIDGE BE BUILT IN THE SAME LOCATION AS THE EXISTING BRIDGE. IT IS NOT FELT THAT THE LOSS OF CONTINUOUS BRIDGE AVAILABILITY ACROSS THE RIVER WOULD BE A GREAT INCONVENIENCE AND WOULD BE WORTH THE PRICE, RATHER THAN TO HAVE A NEW BRIDGE LOOK LIKE AN ERROR BY APPEARING TO BE LOCATED IN THE WRONG PLACE. IT WOULD BE LIKE HAVEING A BAD JOG IN YOUR DRIVEWAY AND NOT ENDING UP IN FRONT OF THE GARAGE DOOR.

ITEM 5. ANOTHER SUGGESTION WOULD BE TO ALTER THE EXTREME EAST END OF DORMAN AVENUE BY ELIMINATING THE NORTH/SOUTH SECTION WHERE IT TIES INTO LAKE STREET AND REROUTE IT STRAIGHT EAST TO TIE INTO THE WEST RIVER PARKWAY.

THIS ALTERATION WOULD DO FOUR THINGS:

A. IT WOULD ELIMINATE CONFUSION AND DANGEROUS TRAFFIC ON LAKE STREET BECAUSE OF DORMAN'S EXTREME CLOSE PROXIMITY TO THE EXISTING INTERSECTION AND ALSO TRAFFIC FROM THE ACCESS APRON TO THE STANDARD OIL STATION.

B. THIS ALTERATION WOULD HOPEFULLY ELIMINATE UNNECESSARY, NOISY, AND EXCESSIVE TRAFFIC GENERATED BY THE OIL STATION BACK THROUGH THIS EAST END OF DORMAN AVENUE, WHICH INCIDENTALLY, IS HISTORICALLY AND BASICALLY AN ALLEY AND CHILDREN'S PLAY GROUND.

C. THIS ALTERATION WOULD NOW EXIT DORMAN AVENUE FURTHER AWAY FROM THE INTERSECTION AT LAKE STREET AND THEREBY GIVE BETTER CONTROL OVER VEHICLE TRAFFIC FOR GREATER SAFETY, BOTH ON LAKE STREET AND ON DORMAN AVENUE, AS WELL AS THE INTERSECTION ITSELF.

D. IT WOULD ELIMINATE THE BLIND CURVE ON DORMAN AVENUE AND THE RESULTING DANGER TO CHILDREN WHICH IS CAUSED BY THE OIL STATION'S SOLID WOOD FENCE. DORMAN AVENUE WOULD THEN BECOME A STRAIGHT AND SAFER DRIVE THROUGH TO SOUTH 46TH AVENUE.

ITEM 6. NOW I WOULD LIKE TO ADDRESS YOUR ATTENTION TO THE PROPOSED NEW BRIDGE ITSELF AND SOME RELATED PARKWAY FACTORS.

IT IS IN MY OPINION THAT THIS NEW BRIDGE PROJECT COULD VERY EASILY BECOME A MODEL FOR THE NATION AS AN EXAMPLE OF BEAUTY, INTEREST, QUALITY, PERFORMANCE AND EQUITY.UNFORTUNATELY THOUGH, IT APPEARS, IN ORDER TO DO A QUALITY JOB IT ALWAYS SEEMS TO COST MORE MONEY. I ALSO UNDERSTAND CORRAO'S LETTER TO SAY THAT "THERE WILL BE NO ASSESSMENT AGAINST ANY MINNEAPOLIS RESIDENT FOR THE BRIDGE REPLACEMENT PROJECT". MAY I POINT OUT THOUGH, THIS IS STILL BEING PAID FOR BY TAX DOLLARS, AND ULTIMATELY THESE TAX DOLLARS STILL COME OUT OF EACH OF OUR POCKETS THROUGH VARIOUS REVENUE PRODUCING MECHANISMS, AND THERE ARE ALWAYS MORE PROJECTS ALWAYS REQUIREING MORE TAX DOLLARS. PERMIT ME TO SAY HERE THOUGH, THAT IF OUR GOVERNMENT WAS RUN LIKE PRIVATE BUSINESS IS RUN, EVERY GOVERNMENT PROJECT WOULD BE A PRODUCER AND NOT JUST A CONSUMER OF FINANCES ONLY.

SO, IDEALLY THEN, IT WOULD BE DESIREABLE TO CONSTRUCT A BRIDGE THAT WOULD PRODUCE IT'S OWN REVENUE AND BECOME MORE OR LESS SELF SUSTAINING. THIS IS NOT A NEW IDEA AND HAS BEEN ACCOMPLISHED IN THE PAST BY ESTABLISHING A FEE FOR USE. THIS IS COMMONLY CALLED A TOLL BRIDGE. NOW LET ME PUT YOUR FEARS TO REST RIGHT HERE, I DO NOT PROPOSE THAT THE NEW BRIDGE BECOME A TOLL BRIDGE. WHAT I DO PROPOSE HOWEVER, IS THAT WE SERIOUSLY LOOK FOR OTHER WAYS IN WHICH OUR PROJECTS, SUCH AS THIS BRIDGE AND PARKWAY DEVELOPMENT, CAN HELP PAY THEIR OWN WAY THROUGH LIFE JUST AS YOU AND I MUST DO EVERY DAY. IN THIS DAY OF INFLATION, RECESSION AND SHAKY ECONOMY,WE MUST HAVE PROJECTS THAT DO NOT ADD TO OUR OVERALL TAX BURDEN, BUT PROJECTS THAT ACTUALLY GENERATE FINANCIAL INCOME FROM VARIOUS SOURCES FOR THE PEOPLE, THE CITY AND THE STATE. EVEN THE PRESIDENTIAL CANDITATE JOHN ANDERSON HAS BEEN HEARD TO SAY THAT "THIS NATION CAN NOT CONTINUE PRIMARILY BEING JUST A CONSUMER WITHOUT ALSO BEING A PRODUCER AS WELL".

OK, BEFORE WE CAN LOOK FORWARD WE MUST LOOK BACKWARD FOR JUST A BRIEF MOMENT. YEARS AGO A LOT OF LAKE STREET BUSINESSES SUFFERED AND SOME CLOSED AFTER TRAFFIC SHIFTED TO THE NEW I-94 BRIDGE WHICH OPENED UP A NEW WAY TO ST. PAUL. NOW WE CAN'T BRING THAT TRAFFIC BACK TO HELP LAKE STREET BUSINESS, NOR WOULD WE NECESSARILY WANT TO DO THAT, BUT I THINK WE CAN DO SOMETHING ABOUT ATTRACTING A DIFFERENT KIND OF CLIENTELE.

WE ARE TOLD THAT IF OUR CENTRAL CITIES ARE TO SURVIVE THEN WE MUST STOP THE EXODUS OF RESIDENTS TO THE SUBURBS. WE MUST INCREASE THE TAX BASE IN ORDER TO PAY FOR OUR RISING COSTS OF CITY SERVICES. WE MUST GENERATE MORE JOBS IN THE CITY. WE MUST ATTRACT BUSINESS BACK INTO THE CITY. I BELIEVE THAT IN ORDER TO SATISFY THESE CRITICAL NEEDS WE WILL HAVE TO BE OPEN TO DOING THINGS DIFFERENTLY THAN THE WAY WE HAVE DONE IT IN THE PAST. IT MAY BE SAID THAT SOMETIMES UNUSUAL PROBLEMS OFTEN REQUIRE UNUSUAL SOLUTIONS.

I BELIEVE THAT I HAVE A PROPOSAL THAT MAY BE ABLE TO HELP SOME OF THESE PROBLEMS IN SOME SMALL WAY, BUT IT WILL TAKE A GOOD DEAL OF COOPERATION BY ALL PARTIES INVOLVED.

MINNEAPOLIS AND SAINT PAUL HAVE A TREMENDOUS ASSET HERE WITH THE MISSISSIPPI RIVER RUNNING THROUGH THE CITIES. I BELIEVE IT IS A SHAME THAT WE HAVEN'T APPRECIATED IT MORE AND DEVELOPED IT MORE FOR PUBLIC USE AS SOME OTHER CITIES HAVE WITH THEIR WATERWAYS AND HARBORS, BOTH IN THE U.S. AND IN OTHER COUNTRIES. ONE EXAMPLE IS THE NEW INNER HARBOR DEVELOPMENT IN BALTIMORE,(SEE EXHIBIT 'A'), WHICH SOME OF YOU MAY BE AWARE OF.

COMMENTS

I WOULD LIKE TO PROPOSE TO THIS ASSEMBLY THAT ALLOWANCES BE MADE IN THE BRIDGE AND PARK DEVELOPMENT PROGRAMS; THAT WILL PERMIT THE CONTACTING OF ONE OR MORE PRIVATE DEVELOPERS WITH THE INTENT OF OBTAINING THEIR ASSISTANCE AND COOPERATION TOWARDS MAKING THIS BRIDGE/PARKWAY DEVELOPMENT A PROFIT ORIENTED PROJECT. I DO SINCERELY BELIEVE THAT IT IS POSSIBLE TO INCORPORATE INTO THIS PROJECT THE NECESSARY FACTORS THAT WOULD ATTRACT BUSINESS CAPITAL INVESTMENT IF THE VARIOUS DEPARTMENTS WOULD PROVIDE THE NECESSARY OPPORTUNITY AND COOPERATION.(SEE EXHIBIT 'B')

YOU MAY RECALL OF HAVING SEEN PICTURES OF BRIDGES IN CITIES OF EUROPE WHERE THEY HAD SMALL SHOPS LINED UP ALONG EACH SIDE OF THE BRIDGE, SOME HANGING OUT OVER THE EDGE SOMEWHAT PRECARIOUSLY. THE ADDITION OF THESE SHOPS WERE DUE PRIMARILY TO A LACK OF DEVELOPMENT SPACE. WE LOOK BACK AND CALL IT QUAINT, BUT THEY RETAINED A HUMAN, COMMERCIAL AND SOCIAL RELATIONSHIP IN THIS WAY, WHERE IN SOME WAYS I THINK WE HAVE LOST MUCH OF OURS. THIS PRACTICE ALSO TENDED TO BRING A DIVIDED CITY BACK TOGETHER AGAIN. A SOMEWHAT FEEBLE ATTEMPT SIMILAR TO THIS WAS DONE WITH THE NEW WASHINGTON AVENUE BRIDGE, WHERE A PEDESTRIAN WALKWAY WAS PROVIDED TO TRY AND TIE THE WEST BANK CAMPUS BACK INTO THE MAIN PART OF THE UNIVERSITY OF MINNESOTA ON THE OTHER SIDE OF THE RIVER. ITS SUCCESS OR LACK OF IT REMAINS DEBATEABLE, DUE TO A POSSIBLE LACK OF ADEQUATE FUNDING.

I BELIEVE IT IS POSSIBLE TO INCORPORATE INTO THE NEW LAKE STREET BRIDGE, ENTIRELY OUT OF PRIVATE FUNDING, A PROPER COMBINATION OF APARTMENTS OR CONDOMINIUMS, SPECIALTY SHOPS, A UNIQUE RESTAURANT AND CHARGE PARKING. IT WOULD BE LIKE A LITTLE SELF CONTAINED VILLAGE. IT WOULDN'T HAVE TO BE MUCH DIFFERENT THAN A DELUXE HIGH RISE APARTMENT BUILDING, EXCEPT THAT IT WOULD LAID OUT HORIZONTALLY, ALL BURIED INTO THE BRIDGE SUPERSTRUCTURE WITH VEHICLE TRAFFIC RUNNING OVERHEAD. (SEE EXHIBIT 'C').

THE COST OF CONSTRUCTION TO THE PRIVATE DEVELOPER SHOULD BE LESS THAN NORMAL BECAUSE THERE WOULD NOT BE ANY EXPENSIVE LAND TO BUY, PLUS MUCH OF HIS STRUCTURE WOULD ALREADY BE THERE IN THE FORM OF THE BRIDGE SUPERSTRUCTURE WHICH IS REQUIRED ANYWAY. HE MAY ONLY HAVE TO PAY FOR THE ADDITIONAL ENGINEERING AND MATERIAL IN BEEFING UP THE STRUCTURE, PLUS A POSSIBLE ANNUAL LEASING FEE.THIS ARRANGEMENT SHOULD MAKE THE WHOLE BRIDGE PROJECT SELF SUPPORTING AND NOT A CONTINUEING TAX BURDEN. BY MAKING THE PROJECT LARGER IT WOULD ALSO GENERATE MORE JOBS AT A TIME WHEN UNEMPLOYMENT IS BECOMING EVEN MORE OF A PROBLEM.

THERE ARE ALREADY EXISTING APARTMENTS AT EITHER END OF THE BRIDGE, AS WELL AS INDIVIDUAL RESIDENCES THAT WOULD LEND A PERIPHERAL FINANCIAL SUPPORT BASE. IT WOULD ENJOY A COMPETITIVE ADVANTAGE DUE TO A LACK OF CONVENIENT AND ATTRACTIVE SHOPPING IN THE NEAR VICINITY.

I THINK THIS LITTLE VILLAGE SHOULD HAVE A NAME TOO, SO FOR THE LACK OF SOMETHING BETTER I THINK WE WILL CALL IT "TROLL VILLAGE". YOU SEE, EVERYBODY KNOWS THAT ONLY TROLLS LIVE UNDER BRIDGES.

A JOINT MEETING WITH SAINT PAUL PEOPLE IS ALSO DESIREABLE IN ORDER TO GET THEIR INPUT. THEIR COOPERATION IS NECESSARY ON ALL FRONTS SINCE THEY TOO WILL BE BENEFITING FROM THE PROJECT. THE PARTICIPATION AND COOPERATION OF THE TOWN AND COUNTRY GOLF CLUB WOULD BE A VITAL FACTOR. WHERE ELSE CAN A PRIVATE DEVELOPER PUT A PROJECT UP RIGHT NEXT DOOR TO AN EXISTING GOLF COURSE AND SWIMMING POOL? THE GOLF CLUB'S PARKING LOT COULD TIE INTO THE "TROLL VILLAGE" PROJECT AS A SITE FOR A POSSIBLE PARKING RAMP. A SMALL RAMP WOULD ALSO GENERATE ADDITIONAL INCOME FOR THE GOLF CLUB.

THE DEVELOPMENT OF A PARK-LIKE SETTING IN SAINT PAUL AT THE BRIDGE IS ALSO ESSENTIAL. THE BRIDGE BEGINS AND ENDS ADJACENT TO PARK BOARD PROPERTY, BUT THIS PARK-LIKE CHARACTER HAS ALMOST BEEN LOST ON THE SAINT PAUL SIDE. THE OPPORTUNITY EXISTS THERE TO TIE THE BRIDGE AREA INTO THE EXISTING GOLF COURSE FAIRWAY AREA WITH A GREENWAY WHICH WOULD HELP REGAIN SOME OF THAT WHICH HAS BEEN LOST.

NOW FOR THE DEVELOPER, THE "TROLL VILLAGE" SHOPS SHOULD NOT BE HARD TO RENT NOR THE CONDOMINIUMS HARD TO SELL DUE TO THE REALLY VERY BEAUTIFUL VIEW BOTH UP AND DOWN THE RIVER. THE OVERALL VIEW OF THE WHOLE BRIDGE ITSELF COULD VERY WELL BE MUCH MORE ATTRACTIVE LOOKING THAN THE RATHER DUSY LOOK OF THE EXISTING BRIDGE. THE "VILLAGE" WOULD BE WELL LOCATED SINCE IT IS CLOSE TO DOWNTOWN MINNEAPOLIS, THE SAINT PAUL MIDWAY AREA, THE UNIVERSITY OF MINNESOTA AND THE INTERNATIONAL AIRPORT. THE PROJECT WOULD NOT BE A HIGH BLOTCH ON THE SKYLINE AND WOULD NOT OBSTRUCT ANYONE ELSE'S VIEW, NOR WOULD IT OBSTRUCT ANYONE'S SOLAR RIGHTS.

THE "TROLL VILLAGE" WOULD NOT HAVE TO BE AN ENERGY CONSUMER LIKE SO MANY OTHER PROJECTS, BUT COULD ACTUALLY BE AN ENERGY PRODUCER. THE HORIZONTAL SOUTH FACE OF THE BRIDGE IS ABSOLUTELY IDEAL FOR PASSIVE SOLAR COLLECTION, FOR MOUNTING ACTIVE SOLAR COLLECTOR PANELS AND PHOTOVOLTAIC ELECTRICAL GENERATING CELL UNITS. IT MAY EVEN BE POSSIBLE TO INSTALL A HYDRO-ELECTRIC TURBIN IN THE BASE OF THE BRIDGE PIER SUPPORT IN THE MIDDLE OF THE RIVER TO RUN OFF THE RIVER CURRENT. AGAIN, SINCE MOST OF THE STRUCTURE WOULD HAVE TO BE THERE ANYWAY THE EXTRA COST TO THE DEVELOPER SHOULD BE RELATIVELY SMALL. I ALSO SUSPECT THAT WITH WITH SOME FACTORY OUTLETS UPSTREAM DUMPING HEATED WATER INTO THE RIVER IN THE WINTER, THAT YOU COULD MAKE MIGHTY GOOD USE OF SOME HEAT PUMPS INSTALLED IN THE RIVER TO HELP HEAT THE "VILLAGE". IN THE SUMMER YOU REVERSE THE PROCESS AND PROVIDE COOLING AND ELIMINATE THE EXTRA LOAD ON N.S.P.

THIS PROJECT WOULD BE IN KEEPING WITH ALL OUR NATIONAL GOALS OF ENERGY INDEPENDENCE. IT WOULD NOT DEPLETE A NATURAL RESOURCE, IT WOULD NOT LOWER ANYONE'S QUALITY OF LIFE NOR WOULD IT ALTER THE ENVIRONMENT. IT WOULD NOT PRODUCE A HAZARDOUS WASTE NOR REQUIRE THE CONSTRUCTION OF A NEW NUCLEAR PLANT. IT MAY EVEN PRODUCE A SURPLUS OF ENERGY. IF THE PRIVATE DEVELOPER PICKS UP THE TAB FOR ALL ADDITIONAL COSTS, WHICH HE SHOULD, THEN THE NET RESULT TO THE CITY AND STATE SHOULD BE THAT THE BRIDGE SHOULD NOT COST A PENNY MORE TO BUILD THAN A CONVENTIONAL BRIDGE, AND MAYBE EVEN LESS. YOU WOULD THEN HAVE AN INCOME PRODUCING STRUCTURE, AN ENERGY PRODUCING STRUCTURE AND AN ASSET TO THE SURROUNDING COMMUNITY, TO THE TWIN CITIES AND TO THE STATE OF MINNESOTA. NOW DOESN'T THAT SOUND BETTER THAN JUST ANOTHER BRIDGE REPLACEMENT WHICH WILL CONTINUE TO BE A TAX BURDEN BECAUSE OF MAINTENANCE COSTS?

ITEM 7. NOW LET'S LOOK AT SOME ASPECTS OF THE RELATED PARKWAY DEVELOPMENT. THE RIVER FLAT AREA OFFERS EXCELLENT POTENTIAL FOR AN ATTRACTIVE PROJECT THAT WOULD BE IN CONCERT WITH THE PARKWAY TRAIL SYSTEM, RIVER DEVELOPMENT AND THE "TROLL VILLAGE" PROPOSAL.

A. THE MINNEAPOLIS ROWING CLUB IS ALREADY ON LOCATION, AND I WOULD HOPE THAT THEY ARE PAYING RENT TOO BY THE WAY. THE CLUB COULD BE AN EXCELLENT LOCAL ATTRACTION FOR A REGATTA IN CONNECTION WITH THE MINNEAPOLIS AQUATENNIAL. THE NEW BRIDGE COULD BE DESIGNED TO GIVE AN UNSURPASSED VIEW OF ALL THE EVENTS FOR THE SPECTATOR, AS WELL AS WATCHING OCCASIONAL BARGE TRAFFIC AND ETC.

B. AN ELEVATOR COULD BE DESIGNED INTO THE BRIDGE PIER SUPPORT AT THE RIVER BANK AREA. AT IT'S BASE COULD BE A WELL DESIGNED DOCK AREA WITH A LAUNCH RAMP. THIS COULD BE A DEPARTURE POINT FOR CHARTER BOAT RIDES UP AND DOWN THE RIVER. THIS WOULD BE ESPECIALLY ATTRACTIVE IN THE FALL WHEN ALL THE LEAVES ARE TURNING COLOR. THE CHARTER BOAT WOULD PAY A DOCK FEE OF COURSE.

C. THIS DOCK AREA COULD ALSO BE A SMALL HARBOR AND MARINA WITH RENTAL SLIPS FOR A LIMITED NUMBER OF SMALL MOTORIZED BOATS. A RESIDENT OF "TROLL VILLAGE" COULD TAKE HIS BOAT TO WORK IN DOWNTOWN MINNEAPOLIS INSTEAD OF HIS CAR. HE COULD ALSO VISIT THE VETERAN'S ADMINISTRATION HOSPITAL, DOWNTOWN SAINT PAUL OR EVEN HOLMAN FIELD AIRPORT. MOTORIZED CRAFT ARE NOT ALLOWED ON CITY LAKES SO THIS COULD BE A VERY ATTRACTIVE ALTERNATIVE.

D. A CANOE RENTAL FRANCHISE COULD ALSO BE EXPLORED FOR THIS DOCK AREA, AGAIN UNDER A LEASE AGREEMENT.

E. THE STERN WHEELER PADDLE BOAT FROM THE UNIVERSITY COULD ALSO DOCK HERE AND FROM TIME TO TIME PRESENT SOME OF THEIR RIVER BOAT PLAYS.

F. IT MIGHT ALSO BE CONSIDERED WHETHER OR NOT TO PROVIDE MOORINGS FOR A LIMITED NUMBER OF HOUSE BOATS, SIMILAR TO WHAT IS DONE IN SAN FRANSISCO OR PARIS, WITH A MOORING FEE ATTACHED.

G. THE WHOLE RIVER FLATS AREA SHOULD BE UPGRADED AS A SCENIC AREA. IF THIS WERE DONE YOU MAY ALSO FIND ROOM FOR A SMALL RECREATIONAL PUBLIC PARK GROUNDS. IT MAY EVEN BE POSSIBLE TO PROVIDE A RESTRICTED CAMP GROUNDS FOR CANOERS AND BACK PACKERS, SCOUTS AND ETC. UPGRADEING THE RIVER FLATS FOR GREATER PUBLIC USE SHOULD NOT MEAN DESTROYING IT'S WILDERNESS OR NATURAL BEAUTY. THE INCOME FROM THE AREA SHOULD PROVIDE FOR BETTER SURVEILLANCE AND MAINTENANCE. SINCE IT WOULD BE SELF SUSTAINING THE MONEY ALSO SHOULD NOT BE SPENT ELSEWHERE, BUT REINVESTED TO IMPROVE THE PROJECT. IT IS IN MY OPINION THAT MONIES ALLOCATED FOR A POSSIBLE VEHICLE UNDERPASS TO REROUTE RIVER ROAD TRAFFIC WOULD BE BETTER SPENT TO IMPROVE THE RIVER FLATS AND REALIZE SOME FINANCIAL RETURNS, ALSO SINCE THE CONTINUOUS UNDERPASS ROAD APPEARS TO BE OF A QUESTIONABLE NATURE.

LET ME CONCLUDE BY SAYING THAT I CAN'T THINK OF A BETTER TIME OR PLACE, OR A BETTER SITUATION IN WHICH TO TAKE ADVANTAGE OF A VERY RARE SET OF OPPORTUNITIES IN WHICH TO DO SOMETHING REALLY WORTHWHILE AND MEANINGFUL, PRODUCTIVE AND CONSTRUCTIVE ON THE MISSISSIPPI RIVER AND FOR THE PEOPLE OF THE TWIN CITY AREA. I WOULD LIKE TO ENCOURAGE ALL DEPARTMENTS INVOLVED IN THESE PROJECTS TO SERIOUSLY CONSIDER THE POSSIBLE AND FAR REACHING BENEFITS THAT MAY BE DERIVED FROM THIS ALTERNATIVE PROPOSAL. ABOVE AND BEYOND THE OBVIOUS ECONOMIC RETURNS ARE THE INCREASED RECREATIONAL, CULTURAL AND SOCIAL ASPECTS; PLUS POLITICAL AND STATE RECOGNITION AND PROMOTIONAL BENEFITS.

NOW, DOESN'T THIS SOUND BETTER THAN JUST ANOTHER BRIDGE REPLACEMENT PROJECT? IF IT DOES, THEN IT SHOULD ALSO BE WORTH THE EXTRA COST OF DOING A FEASIBILITY STUDY. IF SUCH A STUDY IS INDEED AUTHORIZED, MAY I SUGGEST THAT I WOULD LIKE TO CONTINUE TO BE INVOLVED AND HARMONIOUSLY WORKING TOGETHER WITH ALL, TO SEE THESE PROJECTS BECOME A REALITY.

SINCERELY, HARLEY R. JENSEN
ARCHITECTURAL DESIGN CONSULTANT

Minneapolis Tribune
Sun., June 29, 1980

EXHIBIT 'A'

Baltimore has hopes for festival market

By Neal R. Peirce

Baltimore

Fifteen years ago the inner Harbor of this famed old port city was clogged by derelict buildings, rotted piers and sunken boats — a repulsive symbol of the worst of urban decay.

But this Wednesday an important event for Baltimore — and perhaps, by example, for cities across the nation — takes place on the waterfront of handsomely-rebuilt Inner Harbor. Developer James Rouse's Harborplace, a $20-million commercial center — two glass-enclosed pavilions with 120 restaurants, cafes, specialty markets and shops — will open its doors.

Baltimore's leaders have great hopes riding on Harborplace. If it has the catalytic effect they're predicting, tens of thousands of residents, tourists, sailors and conventioneers will be attracted daily, creating a center-city focal point of intense nighttime as well as daytime activity. Success for the project would undergird Baltimore's already impressive downtown and neighborhood revitalization.

The message for the outside world could be even more important: that even an old city, burdened with a blue-collar, workaday image and an ample share of the poverty and racial problems that outsiders say doom older cities, can rebound and turn its center into a vital place for urban people.

Cynics may claim that Harborplace represents just another commercial opening, and not an entirely original one at that. It will bear strong resemblance to Boston's Faneuil Hall Marketplace, the highly successful, 150-store extravaganza on Boston's waterfront that draws 15 million visitors annually, also developed by the Rouse Company with Benjamin Thompson as architect. And many will detect Harborplace's thematic descent from San Francisco's Ghirardelli Square, the modern-day pioneer of what one critic disparages as "the hanging plant, scented candle, boutique syndrome."

Scented candles or not, the first task of city builders is to attract people. As Rouse sees it, "In Harborplace, we'll discover whether the excitement of the Faneuil Hall Marketplace reveals the special spirit of Boston or a yearning of people in cities generally for a festival marketplace. If we can prove that there's a comparable response — and I think we will — then there's a potential for a festival market in every American city, even down to metropolitan areas of a half-million people or less."

Similar Rouse projects are scheduled to open in Santa Monica later this year, Milwaukee next year, and later at the South Street Seaport on Manhattan's East River waterfront. If the success trail continues, a host of imitations can be expected. Similar themes — collections of colorful shops, pleasant pedestrian environments, frequent restorations of old buildings for retailing — are springing up in inner-city revival projects across the country.

But "festival markets" alone cannot a successful city make, as Rouse himself is quick to note. Indeed, they're unlikely to emerge at all unless other critical elements are present. Business leadership, for example: Baltimore businessmen became alarmed about the city's progressive deterioration in the '50s and then formed the Greater Baltimore Committee, which in turn drew up the two great plans which have "saved" the inner city.

The first was for Charles Center, a huge, 15-building office and apartment development in the center of downtown, and the second for the Inner Harbor. On the government side, Baltimore has been fortunate to have a strong-mayor form of government and a string of able mayors. Since 1971, Mayor William Schaefer has been a near hero for his dedication to city renewal. The city wisely focused all housing and urban-renewal powers in a single housing and community-development authority, led for several years by Robert Embry, now U.S. assistant secretary of housing and urban development.

Employing homesteading and other innovative housing programs, Embry and his successors have stimulated new construction or rehabilitation for thousands of families of all income groups. They've been skilled at federal grantsmanship, but government money can't explain the amount of housing restoration now under way. In old Baltimore neighborhoods, it's difficult to find a street where some homes — often cheek-by-jowl with the ugliest slum structures — aren't undergoing restoration.

There are some drawbacks: "Gentrification" is forcing poor blacks out of some inner-city neighborhoods, causing overcrowding elsewhere in the city. All the downtown efforts have failed to revive the old retail center at Howard and Lexington, where two of the city's four major department stores closed, leaving hulking, abandoned buildings. And in such neighborhoods as "Little Italy," there's fear that Harborplace will draw off valued restaurant trade.

Harborplace's single greatest virtue is that it fits Baltimore's economy and tone of life so well. The city has a well-diversified economic base. But the harbor — one of the world's largest, receiving over 5,000 ships each year — gave birth to Baltimore and remains its strongest asset. Around the globe, great harbor cities are known for their color and diversity. Harborplace will accent those qualities for a city that has not exploited them well for generations.

Other projects already built or planned around the inner Harbor should build on the same strengths. They range from the 30-story World Trade Center to the Maryland Science Center, from floating restaurants and a new fish market to an aquarium that will include a glass-enclosed Amazon rain forest. And beside Harborplace is the permanent berth of the frigate Constellation, the first commissioned warship of the U.S. Navy.

Thirteen ethnic festivals — Ukranian, Finnish, Czech, German and others — are held on the Inner Harbor or at Charles Center each summer. The city's celebration of itself culminates each September with perhaps the grandest urban event in America, the annual Baltimore City Fair. Over 2.5-million city residents and visitors come to hear concerts, to view dozens of neighborhood arts and crafts exhibits and to sample Chesapeake Bay seafood delicacies and ethnic foods.

Developer Rouse hyperbolically claims that "Baltimore in two years will be recognized as the most dazzling center city in America — in a place that a few years ago wasn't going anywhere." We'll see. But one point remains: If Harborplace draws people even half as well as its promoters hope, it could transform Baltimore's celebration into a year-round event.

Neal R. Peirce is a columnist who writes on state and local government.

Real needs of cities elude candidates

EXHIBIT 'B'

Minneapolis Tribune
Sun., June 15, 1980

By Neal R. Peirce

Washington

The flurry of presidential politicking that surrounded the annual meeting of the U.S. Conference of Mayors in Seattle last week was essentially irrelevant to the real and immediate needs of cities caught in the throes of recession and a set of tough urban problems.

Ronald Reagan came to advocate the turning of programs and tax sources back to cities, thus disentangling them from federal red tape. The idea might have long-term potential, but for a mayor now struggling with double-digit unemployment it's this gruel indeed.

But Democratic candidates, who suggest that Washington might do more for the cities through targeted anti-recession aids, may be indulging in deception. A Democratic Congress has already rejected President Carter's proposal to target to hard-hit cities some $500 million of the money saved from terminating the states' share of revenue sharing. Washington is striving to balance its budget; defense spending is rising. A dramatic change in congressional mood — beyond the capacity of either a Carter or Edward Kennedy to engineer — would be necessary to give the cities substantial relief beyond the multi-billion-dollar programs they're already receiving.

Wise cities will now concentrate on home-grown rather than federally incubated remedies for the long list of problems now afflicting them:

■ Fiscal crisis. Massive potential deficits are reported in such cities as Philadelphia ($118 million), Cleveland ($111 million), San Francisco ($100 million) and Detroit ($140 million). New York's fiscal outlook is again darkening. But the congressional Joint Economic Committee reports a nationwide worsening of the urban fiscal outlook and suggests that some causes of the stress that afflicted older industrial cities are spreading to cities, as well as suburbs, in every region.

The roots lie in the heady government growth of recent years. Federal aid propelled local revenue growth forward in the '70s as citizens got a taste for much higher environmental and social-welfare standards. But federal aid peaked in 1978 and has since declined. Citizens are resisting any property-tax increases to take up the slack. Yet inflation inexorably continues to drive up costs for payrolls, welfare, mass transit, sanitation, police and fire services.

Fiscal solutions are hard, but not impossible to find. Some cities — Cleveland most recently — have benefited greatly from expert business counsel on finances and management; all should. Contracting out government functions, including to neighborhood groups, can result in savings. Budgets for schools with declining enrollments must be cut.

And city officials are beginning to sight some partial solutions to the ever-grimmer problem of "deferred maintenance" of urban water mains, sewer systems, streets, bridges and mass-transit systems. Examples: "enterprise funds" or earmarked user charges that must be used for maintenance and can't be diverted to the city's general budget. Or establishing, as Cincinnati has done, a multi-year capital investment plan.

■ Government unions. Bitter strikes in 1979 and 1980 in such cities as New Orleans, New York, Toledo, Nashville, Kansas City and Chicago (the first fire-fighter strike in that city's history) point up the contentious, difficult labor-relations atmosphere predicted to last through most of the 1980s.

Public unionization has spread rapidly, most recently through police ranks. Wages and benefits outpaced inflation in the mid-1970s, but have fallen behind since 1978. Cities lack funds for wage boosts, even if they'd like to grant them. An era of layoffs and city hall demands for union givebacks of worker benefits, such as short work weeks, has dawned. Thus the flash point in city-labor relations is more quickly reached than ever before.

Cities have little choice: They must hang tough in dealing with unions. They must be willing to face up to strikes; experience shows that laws banning them are ineffectual. They must maintain management prerogatives, resisting unionization of supervisory personnel. And they must combat widespread abuse in disability pensions.

■ Social strife. The Miami riots were a grim reminder of the racial tensions and inequalities that still afflict cities. Minority youth unemployment remains the country's most dangerously neglected social problem. And now the burden of a major share of the 100,000-plus Cuban refugees lands on city shoulders.

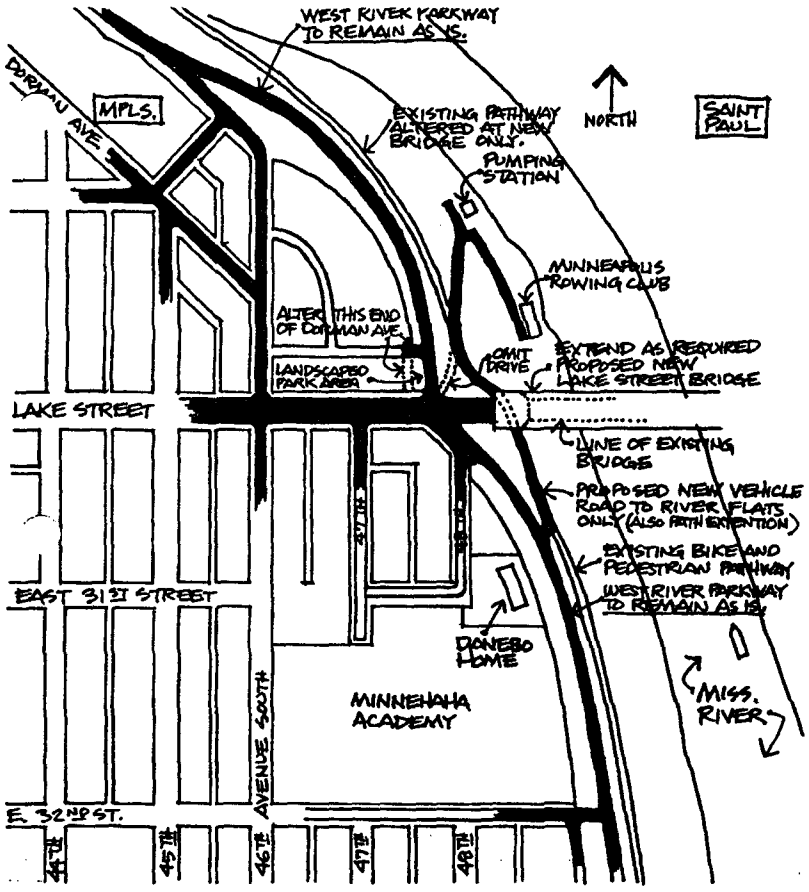
To address over-all black and Hispanic economic problems, cities have every right to demand targeted national investments, such as defense contracts and synthetic-fuel expenditures. For minority youth, says New York Municipal Assistance Corp. Chairman Felix Rohatyn, the country won't "get anywhere" unless it starts "to close the loop between the educational system and the employer."

■ Housing. In Los Angeles, it's called "hotbedding" — two or three families in a single small apartment, sleeping in shifts because there isn't space for everyone to sleep at once. In scores of inner cities, poor people and the elderly are squeezed against the wall, sometimes literally, as the rental housing market falls victim to mounting condominium conversions to house affluent young professionals of the baby-boom generation. Investors shun new apartment construction because of tight credit, high building costs, tenants' low incomes and the specter of rent control. Middle-class flight no longer opens up neighborhoods for the poor, and the refugee influx compounds the overcrowding.

Even multi-billion-dollar federal housing subsidy programs seem unequal to the magnitude of the problem. In the short term, cities can alleviate displacement of the poor and elderly by requiring apartment building owners to give ample advance notice of conversion plans and by showing tenants how to form housing cooperatives. Another approach, pioneered in California, is called inclusionary zoning — a city requirement that some 10 percent of units in a large new development be sold well below cost to moderate-income families.

Many of these city efforts can, of course, be aided and abetted by fine tuning of federal tax and grant programs. But the presidential candidates offer little along that line. Reagan lacks the knowledge — even one of his chief mayoral backers in Seattle lamented that Reagan knows virtually nothing about how cities operate. And the Democratic contenders seem unable to lay to rest the hope of Washington riding to the cities' rescue with billions in new aid.

Neal R. Peirce is a columnist who writes on state and local government.



PROPOSED LAKE STREET BRIDGE REPLACEMENT
ID ALTERATIONS TO WEST RIVER PARKWAY.

NO SCALE / H.R. JENSEN - DESIGNER / JULY 9, '80 EXHIBIT 'D'

Minneapolis Tribune

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20A Sunday, August 19, 1979

Rediscovering the Minneapolis riverfront

Mayor Hofstede's budget proposals for next year include $30 million for development along the Mississippi River. That's just the latest sign of renewed interest in the city's long-overlooked riverfront. Other indications include work on a regional park along both banks of the river near downtown Minneapolis and the lively interest of private developers in riverfront properties long given over to railroad tracks and warehouses.

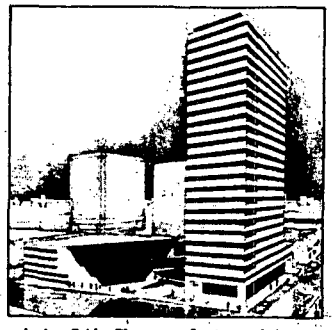
The riverfront's rediscovery, and its reclamation for the people of Minneapolis, is a welcome change. European cities have long known how to use a river for commerce without foreclosing it as a pleasant retreat for fishermen, strollers, picnickers, lovers and idlers, or as a strip of nature adding grace to an urban landscape. Americans, however, hurried to develop their new land and gave priority to industry, discovering too late that they had walled their rivers with brick and asphalt, closing them off from the life of the city.

But agreement that the Minneapolis riverfront should be reclaimed doesn't necessarily mean agreement as to *how* it should be reclaimed, or by whom, or for what. The Riverfront Development Coordinating Board is evidence of that. The board, which includes representatives of the city council, the park board and the Housing and Redevelopment Authority, reflects disagreements within and among those agencies. How much land should be developed as a park? How should remaining land be used? Who should develop it? Should the city help finance development, or should it rely on the private market? Will the proper kind of development take place if the city does the latter?

Those questions may be difficult, but we're glad they're being asked. They indicate that city officials no longer take the river for granted, but think of it as a major asset, to be used to best advantage. Out of the discussion of those questions can come a well-considered plan that balances competing ideas and interests for the good of all. Exactly what the riverfront will become is still unclear; there is time for citizens to make their preferences known. What is clear, though, is that the riverfront will not again be the city's forgotten, neglected backyard.

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Williams/O'Brien Assoc., Inc. Architects • Mpls., MN

Richard P. Gates
[redacted]

September 8, 1993

Superintendent
Mississippi National River and Recreation Area
175 East 5th Street, Suite 418
Box 41
Saint Paul, Minnesota 55101

Re: Mississippi National River and Recreation Area (MNRRA)

Dear Sir:

My husband and I have worked industriously all of our lives rearing our families and saving money in order to be able to enjoy our retirement in peace and quiet and, hopefully, seclusion - free from harrassment. At last --- the first day of spring of 1992 we moved into the home of our dreams at 6668 East River Road, Fridley, MN-- on the Mississippi River - I have dreamed of living on that river ever since reading Tom Sawyer and Huckleberry Finn as a youngster years ago. July 15, 1993 we both retired and are now enjoying our beautiful home and river view.

It has come to our attention that our dream could possibly be shattered by the "Draft Comprehensive Management Plan Environmental Impact Statement" prepared by the "Mississippi River Coordinating Commission and National Park Service" which concerns development, management and maintenance of a 72-mile-long corridor from northern Anoka County south as far as Hastings, Minnesota - along the Mississippi River.

Our home and property lie within that area, in Fridley, MN bordering the south side side of Manomin Park, on the east side of the river. MY HUSBAND AND I WOULD BE DEVASTATED IF A WALK-WAY OF ANY KIND WERE TO BE RUN THROUGH OUR PROPERTY ALONG OUR RIVER FRONT! This would take away the very reasons we purchased our home;i.e,peace, quite and privacy of natural seclusion which we now enjoy - and thank Almighty God for daily!

Please note that on Page 19 of the Draft, lower paragraph, is stated: "This plan includes protection for all resorces listed in the act, and it recognizes that most of the land in the corridor is and will remain privately owned. This plan respects the right of private property owners to determine appropriate uses of their land subject to adopted community land use regulations...." and so on; also, on page 23 is stated in first paragraph "A variety of....uses could exist near the river. These would include recreational, educational, residential, and so on". The plan continues on the bottom of page 23 to state that "Most existing residentisl, commercial and industrial development in the corridor would not be significantly changed by this plan...." and other equally vague references to property owners' rights; however, nothing truly specific that we can find.

We do find, however, on page 19 top paragraph clearly stated as follows "EMINENT DOMAIN should only be used as a last resort to protect corridor resources as specified in the MNRRA legislation..." and so on. Also stated on page 86, bottom paragraph, "There is a possibility that land acquisition costs would be incurred if eminent domain proceedings

are required to protect threatened resources under the terms of the MNRRA legislation and this plan; however, eminent domain would be used only as a last resort in very limited circumstances,...." and so on however, clearly indicating "eminent domain" can be forced on the homeowners!

We find no specific language to protect us as homeowners, from our land being usurpped. For this reason alone, we are against this draft!! We do not agree that anyone should be allowed to take all or any of our property for a National Parkway System; not even if we were reimburned the so-called "Market Value".

Our home does lie within the 300 foot River Front Area, as described in the Glossary on page 240. If the Shoreline Setback Area of 100 feet, also described in the glossary on page 241, were taken from us, it would use up all of our yard beyond our deck from which we view the river. This would totally destroy the sanctity of our existance. It would also drastically reduce the value of our home - who would want to buy it then? Would you????

My husband and I have always been promoters of clean air and water and wish to contribute in any way possible to environmental clean-up. We long for the day when all people can swim and fish the rivers without fear of contamination.

Lastly: what of the tremendous expense to tax payers = Where will the money come from??? We have read recently in the daily papers that the funds for maintaining Yellowstone National Park as well as other National Parks, also, State Parks, have been so drastically reduced

that much needed Park Rangers and other personnel have had to be curtailed resulting in vandalism in the Parks, and so on.

WE CAN'T AFFORD THE PARKS WE HAVE NOW!!!

Please consider that home owners living along the Mississippi River pay a great share of the taxes needed to maintain surrounding areas already in existance. Are they to be taxed more? Are they to lose some of their land? or be forced to move?? Local governments are in need of these monies.....

In conclusion, we wish to reaffirm our objections to this "Draft". We are very concerned that the language is not at all specific enough about many items and policies.

The entire draft is much too vague; contradictory in parts; incohesive in others.

Respectfully yours,

Mr. & Mrs. Richard Gates

Mr. and Mrs. Richard Gates

P S. We are against any more Federal Laws and regulations concerning our river corridor. We are doing a good job locally and wish to continue working on that level.

9/9/93

Dear Sirs:-

Please be informed that I am opposed to the new plan for the Mississippi River corridor.

Sincerely,
Patricia Steele

[redacted]

September 6, 1993

Dear Sirs,

I am concerned that the plan for management of the MNRRA does not reflect the original intent of the law. For instance, the law directs the Plan to build upon existing local plans and programs for local zoning and variance decisions. However, the Plan adds new "veto" authority to the Department of Natural Resources and the National Park Service. Why should we add a new process for local control and add a new level of bureaucracy and cost when the current process is working well? I believe we should not add the "veto" authority.

Sincerely,
Gregory D Potasek
Gregory D. Potasek

[redacted]

Sept. 6, 1993

Dear Sirs:

After reading the Draft of the MNRRA Proposal, I would like to express a Few opinions on it.

Residential concerns are not adequately addressed. Current homeowners need to have their property rights protected. Many of us built our homes long before MNRRA.

Alternative B is not acceptable. The NPS is granted too much power. It is costly. Its' land acquisition programs are vague and open-ended.

I don't feel the public was adequately informed. I received notice at the end of July. Why weren't we and more of my neighbors properly notified of the MNRRA proposal?

Sincerely,
Lynnette Schack

Lynnette Schack [redacted]

Superintendent of the Mississippi
National River & Recreation Area

Per the "proposed plan" being considered for Mississippi Area. I feel, as many others, that we need no N.P.S. facilities in St. Paul & Mpls.
From the alternatives Summary Sheet which I received — I feel alternative "A" best meets & suits the nature of the Mississippi in the Champlin / Anoka Area

Sincerely

Bernie Schwarzrock

[redacted]

cc City of Champlin
US Congressman Rod Grams
State Representative Charlie Weaver

GREEN-WAY TURF NURSERY INC.

Superintendent
Mississippi National River and Recreational Area
175 East 5th Street
Suite #18, Box 41
St. Paul, Mn. 55101

RE: Mississippi River Coordinating Commission and N.P.S.

As a homeowner on the Mississippi in Anoka, we feel that Alternative A best suits the nature of the Mississippi in our area.

Sincerely,

Robert R. Peterson

RRP/s

L. EDWARD EVANS, D.D.S., P.A.

Practice Limited to Oral & Maxillofacial Surgery

September 9, 1993

Superintendent
Mississippi National River & Recreation Area

Dear Sir:

I have had the opportunity to review the alternative summary by issue sheet which listed the issue, the Proposed Plan, Alternative-A, Alternative-B, and Alternative-C.

I definitely would favor Alternative-A with Alternative-C a far second and Alternative-B as totally non-acceptable, invasive, highly cost ineffective, terribly spendy of already overstressed taxpayers' resources, along with adding humongous costs to use of the river.

I have been a lifelong liver on the river and at present I am 56 years of age. I was born on the Mississippi in Sauk Rapids and for the last 15 years have lived directly on the Mississippi River in Anoka, as well as have had a boat on the river for 16 years previous to that that I have been a resident of Anoka. Last Sunday I had the privilege of paddling a canoe from Monticello down to our home in Anoka with a lad from Austria. I have found the river to be a much more exciting place than it was a number of years ago. I have found the river to be a much more exciting place than it was a number of years ago. I have found the river to be much cleaner in that there is little or no open sewage dumped into the river above the I-694 bridge. I have been on the river through the locks with my power boat all the way down as far as Lake City, as well as up to St. Croix. I do get the St. Paul paper and realize that there is a tremendous amount of sewage dumped in the river by the Pigs Plant in St. Paul, as well as by the city of St. Paul. Therefore, I do not use the river other than just to boat in it and refuse to swim in it south of there due to the government NOT ENFORCING ALREADY IN PLACE RULES AND REGULATIONS. It is one of the reasons why I do not see any reason for more rules and regulations when those that already exist are not being enforced by the powers that control the river at this point.

The river provides an array of entertainment and activity for many people. There are Bass fishermen, Walleye fishermen, floaters, swimmers, walkers, park users visually as well as physically that are on the river. The river is used by a multitude of people in different ways and I would definitely hate to see any restrictions placed on the river. Because of being a lifelong user of the river I am finally seeing the river starting to be used much more than it ever has been in the past, but not in a detrimental way, but in a very positive way.

It would be my concern that any further regulatory bodies, acquisition of private land in front of already existing homes or any type of ideas allowing people to trespass across property that is adjacent to the river, being that on many of the older lots the homes are very close to the river, which

[redacted]

would allow for the opportunity of theft, garbage being thrown in your yard, boats being taken, etc.. It would certainly turn the river into a "shopping center" for thieves. There is a problem with stealing at the present time and we certainly do not need to put our wares out for the public to walk or ride by and select where they would like to hit that evening.

If you are going to propose anything or follow up on anything, I feel Alternative-A is the position to be in. As I wanted to say earlier in the letter, at the present time we are having problems with bankwash and erosion and the regulations are such that it is making it difficult for us to follow up and do what we need to do to stop these banks from eroding and losing land, a property which we already have, due to all of the hoops and regulations which we must jump through. Therefore, we certainly do not need Alternative-B or C, which in turn would only add to the already "boatload" of restrictions that do exist on the river at the present time.

L. Edward Evans, D.D.S.

[redacted]

08 September 1993

Superintendent
Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418
Box 41
Saint Paul, Minnesota 55101

Dear Sir:

My name is Keith D. Graham and I am a homeowner on the edge of the Mississippi river in Champlin. I have received the Draft Comprehensive Management Plan Environmental Impact Statement. I have many concerns about the plan and the new authorities it recommends for governmental agencies above and outside our local government. I would like to see the plan curtailed as much as possible, even to the extent of deauthorizing the MNRRA.

In terms of the plan's alternatives (p. vii), my choices (in decreasing order of preference) are as follows:

- Alternative A-no action (with luck, leading to deauthorization of MNRRA)
- Proposed plan-because it is balanced between more extreme alternatives
- Alternative B-because if an extremt view wins, I'll opt for conservation
- Alternative C

Now to be more specific. First, I understand that the enabling legislation directs the plan to build upon existing local plans and programs for local zoning and variance decisions. Yet the report is liberally sprinkled with statements that the NPS and/or the DNR shall have review authority over plans and decisions of local government. This implies veto authority for the NPS and/or the DNR, to which I am strongly opposed. It is another level of bureacracy that is not necessary, hence it is undesirable. It is unneccessary because the local governments (at least on this northern section of the river) are almost draconian in enforcing current regulations along the river. I have witnessed my own city's planning commission and council be totally picayune in not even permitting my neighbor to change from a swinging door to a sliding door on his "gradfathered" riverfront porch. Yet, I know the council has spent time consulting with other councils along the river to become convinced that their actions are generally consistent with other local governments. In short, the local councils are protecting the riverfront very carefully. And the homeowners also are generally careful about protecting the river. If we don't take care of our riverfront, the river takes it away during periods of high water.

I have read true and authenticated horror stories (e.g. in Farm Journal and National Geographic) about problems of landowners fighting off severe restrictions on land use or the actual taking of land by governmental agencies. I don't want there to be any new opportunity for that to happen here. And such things do eventually happen when authority for them is granted to some agency.

Keep control of the river local. Current regulations require the local governments to follow a careful and balanced policy. That is appropriate and that is enough.

I am concerned about the report's lack of specifics., particularely with respect to private residential private property.

I think there should be clear and reasonable appeal processes spelled out for all property owners and local governments who may be affected by any new authority granted to non-local agencies (e.g., NPS and DNR).

We have a generally balanced approach now between community economic and environmental interests in managing the riverfront, and it is being done well by local governments. We should keep it that way. If we are forced to follow the path of increased governmental activism and additional outside authority, a balanced approach in weighing the needs of the communities along the river. Extreme views are almost always unwise, whether they be those of the greenest environmentalist or the promotingest real estate developer.

Very truly yours,

Keith D Graham

Keith D. Graham, PhD

September 8, 1993

Dear Director and Commissioners:

We favor local management and control of the River corridor with input and review from the Mississippi River Commisssion. The issue of "veto" authority given the Commission over the local management group is not well explained and is very controversial.

As homeowners and taxpayers living along the great Mississippi River bank we are oppossed to the condemnation of private property along the residential sections of the river to provide a public hiking and bicycling trail.

The concern of residents about these issues should be recognized and addressed as many stories and interpretations are currently being advanced.

Thank you,

Mary Joy & Bill Kinney

Mary Joy and Bill Kinney

[redacted]

[redacted]

Sept, 7, 1993

Superintendent
Mississippi National River
and Recreation Area
Suite 418, Box 41
175 East Fifth Street
Saint Paul MN 55101

JoAnn M. Kyral, Superintendent
Mississippi National River & Recreation Area

The draft comprehensive management plan/DEIS contains elements that could enhance the Mississippi River corridor for future generations. Our children will look back to our generation and say that we were good land stewards, if the Alternative B is selected. The present oversite by the DNR and the Met Council has led to the present degraded condition of the Mississippi River. The plan must recommend a strong Federal involvement in the corridor with enough resources to coordinate with and consider the activities of the local entities. The present levels of monitoring, implementation and enforcement are insufficient. The MN Dept. of Natural Resources and the Metropolitan Council will need to have important parts in the MNRRA, but the overall control and administration of the Recreation Area must be the responsibility of the National Park Service.

There must be a reduction in the pollution coming into the river from sources along the river. A goal for the river should be that the water quality at Hastings be no worse than the water quality at the beginning of the corridor at the Crow River. The problems of the poor water quality of the Minnesota River, due to agricultural runoff, needs to be addressed by the MNRRA plan. The corridor must be a model for the nation to prove that river pollution can be prevented and controlled. A new review of the currently approved discharge permits into would allow a base line to be established, so the total toxic load on the River could be determined. There must be a declining level of toxic loading in the River. In the future, new developments that would add toxic loading on the River would require a balanced reduction of toxic loading from other existing toxic sources.

The Recreational value of the River would be greatly enhanced by a continuous System of Trails and Green Belts along the side of the River. Acquisition of land along the corridor must be given high priority to add to the Trail System. Private land owners must be given incentives to grant easements to permit the extension of the Trail. A higher priority must be established to grant Public Access to the River over demands for the enlargement of Industrial and private uses. The Public Access must be limited into Critical Habitat and Wetland areas.

Open Space and Wetlands within the corridor must be restored, enhanced and protected. No net loss of Wetlands policy must be more than just rhetoric. The Plan must state specifically how the policy will be accomplished and implemented.

Land uses that degrade the river's natural qualities through pollution must be halted. Existing protection of critical areas must be strengthened and where these protections are stronger than the MNRRA plan, then the local regulations must remain in place.

The problems of Non-Point sources of water pollution must be addressed with a plan for the reduction of these toxics from these sources. The restoration of degraded wetlands could be employed to clean up these sources prior to discharge into the river.

The present management of the portion of the Mississippi River flowing through the Twin Cities can not be considered successfu when it is not healthy to swim in the river or eat fish that have been caught in the river. The present management of the river can not be considered successful when the public has few opportunities to see the river closeup because of improper development along the banks.

Congress has determined that the MNRRA is of national significance and importance. We must not permit local commercial, industrial and governmental interests to block the creation of a truly national river corridor. We have an opportunity to make an urban river corridor that would be a national model to demonstrate that environmental improvement and economic health can coexist.

Sincerely yours,

Paul Wright

Paul Wright

Sept 8, 1993

To whom it may Concern,

We are home owners whose property extends to the Mississippi River. As with others who live on the river, we take pride and do everything we can to keep the bank natural so that people using the river can enjoy it.

Almost every day, spring thru autumn, we see people enjoying the river. I do not see how the Federal government can improve upon the use of the river in our area. There are many parks, wild areas and boat landings that people make use of right now.

We have beautiful hiking and biking trails near by in the Elm Creek Reserve.

Please leave the authority over the river in the hands of our capable local officials. We vote for Plan A.

Sincerely, Jerry + Judy Johnson

[redacted]

FORESIGHT
CONSULTING GROUP

To: National Park Service
Attn: JoAnn Kyral, Superintendent
Mississippi National River and Recreation Area
175 E. Fifth St., Suite 418
St. Paul, MN 55101

**Written Statement of Mike Priesnitz, President, Foresight Consulting Group, Inc.
for the Hearing Record concerning
the Mississippi National River and Recreation Area Draft Plan/EIS.
September 10, 1993**

*"It's Deja Vu all over again."
- Yogi Berra*

The reason I find the Yankees' catcher's statement so apropos is that I've been involved in a leadership capacity with this issue since 1979. At that time I was asked to undertake a consultant role to refashion a community consensus around the National Park Service's "Reconnaissance Study." My participation was funded by private foundations and at the specific request of congressional offices which were dismayed by the inability to get a consensus on the NPS study. Consensus around a framework for multiple use of the Mississippi River Corridor was finally achieved after considerable time and effort. Now, nearly a decade later, that hard-bargained consensus has evaporated.

As MRCSC project manager through its existence; as the chief staff person leading the interagency work group's drafting of what was to become P.L. 100-696; and as an interested citizen and volunteer who wants to see the MNRRA designation and plan be a positive force for enhanced recreational opportunities and economic growth, I believe the MNRRA draft plan/EIS departs significantly from the intentions of and goals for the management of the riverway.

My major objection to the draft plan is this: in central policy issues such as land acquisition, land use regulations, intergovernmental relationships, and the balancing of competing interests, the MNRRA plan/EIS abandons the local consensus arrived at earlier, which made passage of P.L. 100-696 possible. As the chief staff person responsible for fashioning a community-based consensus for the passage of P.L. 100-696, I urge you in the strongest way to adopt the draft plan changes recommended in the Stakeholders' position paper. I believe that only if the plan is realigned with these earlier principles and objectives will it have an opportunity for successful, efficient implementation. The draft plan will require state

[redacted]

legislation and cooperation from local, [redacted] and state governments and the private sector in order to work. The likelihood of such cooperation without the changes recommended by the stakeholders is problematic.

The lack of responsiveness to the concerns of the diverse interests in the MNRRA will be evident in the broad-based, determined opposition voiced to the draft plan. The Superintendent has speculated that a single company is somehow the sole source of this opposition, but this is not credible, and this theory will not be believed by decision-makers. Moreover, advancing this notion as the genesis of the dispute trivializes the hours of study invested by an array of businesses, trade associations, labor unions, local governments and others, all of whom have reached a similar conclusion, each from their own perspective.

In closing, I recall the final MRCSC policy analysis retreat which was held to discuss what would be the substance of the MRCSC recommendations. Chief among the recommendations was the designation of the Mississippi River as a National River. Along with this was the issue of who should be the lead federal agency. On this point, my meeting notes of the retreat show that Peter Gove made a motion, based on a staff recommendation, that the U.S. Army Corps of Engineers be recommended as the lead federal agency. The Gove motion was not made as any criticism of the NPS. No, the minutes show that the rationale advanced by Gove was that (1.) the USACE already had a presence on the river; and (2.) he and others on the MRCSC felt the Corps of Engineers would be better able to fashion a plan which provided for the special economic development considerations of an urban river like the Mississippi.

It never occurred to me that this second concern Gove expressed in 1985 would become an issue. But it has. The Denver planners assert that the plan adequately provides for economic utilization of the river corridor and balance of competing uses. Surely this outside evaluation must be reexamined in light of the great preponderance of local business, labor, economic development and related interests who find the plan is unbalanced and will damage economic interests.

It is now time to take the concerns seriously. Regardless of the number of interest group meetings the NPS attends, if the plan is not made responsive to these concerns, the affected parties will judge it to be a failure.

The opportunity still exists for the MNRRA [redacted] to articulate a realistic strategy that accommodates all of the varied interests. That effort should be made to do so, and I, for one, will continue to offer my time and energy in that pursuit.

Sincerely,

Michael F. Priesnitz

Michael F. Priesnitz, President
Foresight Consulting Group, Inc.

September 7, 1993

JoAnn M. Kyral, Superintendent
Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418
Box 41
St. Paul, Minnesota 55101

Floyd L. Anderson
[redacted]

Dear Ms. Kyral,

I live on the West bank of the Mississippi. I wholeheartedly support the proposed management plan for the Mississippi National River and Recreation Area (MNRRA). Several neighbors I've talked with unanimously support the proposed plan. Our neighborhood has fought unwanted development in the past without very much success. We welcome the National Park Service who with the DNR will provide coordinated and long needed oversight. I believe that we need a watchdog with a "preserve and protect" philosophy like our own to bring some order and communication to a multi-jurisdictional area like MNRRA.

I am disturbed by several mailings that I have received from a group (or individual?) called Minnesotans for the Mississippi that seem to advocate "do nothing, leave things alone, everything is just fine". I called and only got a recording. They said they didn't want any money. I left my name and phone number and asked someone to call me. I wanted to ask who were members of the group and what was the source of their funds. Unfortunately, no one returned my call. It is my opinion that this effort is a well financed but thinly disguised special interest group that is more interested in themselves than in the welfare of the River.

Sincerely,

Floyd L. Anderson

10 September 1993

JoAnn M. Kyral, Superintendent
Mississippi National River and Recreation Area
175 Fifth Street East, Suite 418
St. Paul, Minnesota 55101-2901

Dear Superintendent Kyral,

In reference to D18(MISS) the Draft Comprehensive Management Plan Environmental Impact Statement:

It is a matter of the greatest importance that the final document supports the earliest restoration of the water quality of the River.

We must act from the understanding that the water cycle is not separate from ourselves, our health or our cultural and spiritual well being.

Our behavior as individuals and as organisations must change. We can change our industrial, agricultural and transport practices. What we have done to the River, we have done to ourselves. What we do for the River we will do for ourselves and our children.

It requires vision and courage to act, not for the moment, but for the future. Let our actions reestablish a spiritual relationship with the River. Collectively we can help restore the health of the River, the Oceans, the Sky, the Planet and ourselves.

Sincerely,

David Luce
Hawthorne Neighborhood
Minneapolis

September 9, 1993

JoAnn M. Kyral,
Superintendent, Mississippi National River & Recreation Area
175 East Fifth Street, Suite 418, Box 41
St. Paul, MN 55101

Dear Ms Kyral

Let me first compliment the Coordinating Commission, Contributors, Planning Team, and Publishers for the excellence of their efforts in the preparation of the draft document. I also apologize for not finding the time to review the document and prepare my input in the detail that it deserves.

My observations are those of a twenty-two year resident of Champlin, MN residing along the shores of the Mississippi on what I refer to as "Lake Haviland", the pool above the Coon Rapids Dam. My comments are limited to that perspective and the impacts as I perceive them from that experience.

I find myself favorably inclined to the general and overall aspects of the plan, and although I may disagree with some of the specifics, I will limit my observations to topics which I feel should be included in the plan, but are not.

Plan Purpose and Visions (p.10):
Although the plan recognizes the extensive private ownership and residential development above the I-694 bridge, the Purpose and Vision of the plan do not recognize and validate private residential ownership as an appropriate use. Neither does it outline any plan for respect of privacy or quality of the residential environment, but emphasizes only public access and use.

Trail System (p. iv; p. 33):
The plan recommends the use of utility easements for public access through residential areas. My home, like many of the older homes in the area, is located within 50 feet of the edge of the river bluff, yet an earlier proposal by Hennepin County Parks Department recommended a dual trail system through the properties along the river. Horses and cross-country skiing were recommended for the trail between the houses and the street. Jogging and Snowmobiles were recommended for the trail between the houses and the river, fifteen feet from our living room, den, and bedroom patio doors. Such a proposal shows little respect for private residential ownership.

Visitor Recreational Use (p. v):
The plan recommends an emphasis on the encouragement of additional recreational use. The recent restrictions imposed on the BWCA would indicate that the environmental impacts, on an already heavily used and polluted resource such as the Mississippi, must be carefully considered prior to any encouragement to increase its use.

Riverbank Erosion (p. 37, Item 3):
The problem of bank erosion is recognized in the section addressing Commercial Navigation but should also be addressed for recreational areas. I do not know if the reference on p. 41, item 19 to "streambank protection" should be interpreted to address this concern. The enormous increase in recreational boating activity over the years has significantly increased the rate of erosion along the shores of "Lake Haviland" and as a result many residents have had to install a variety of fill and shoring to slow the process. The result is most often in conflict with the shoreline preservation and restoration aspects of the plan.

Noise Impacts (p. 38, Item 4):
The problem of noise impact is recognized in the section addressing Commercial Navigation and should also be addressed for recreational areas that adjoin residential areas (as on p. 40 item 8 but more specifically as they impact residential areas). The extensive use of high speed recreational boats, along the narrow sections of the lake between the bluffs, results in noise impacts that are well above the levels generated by barge operations. Specific plans should be developed to address noise pollution in the high use recreational areas.

Threatened and Endangered Species (p. 41):
I applaud the inclusion of this section of the plan but would like to see the concept expanded to include wildlife in general and waterfowl specifically. The preservation and restoration of the riverbank and the requirement for natural vegetation in the setback area will do a great deal to accomplish this but it should be a specific goal of the plan. The river area has enormous potential for wildlife and waterfowl production and there should be specific recommendations, and encouragements, for the development of nesting areas on both public and private lands.

Interpretive Facilities at the Coon Rapids Dam
Plans for the interpretive facilities, and the recreational activities at the Coon Rapids Dam location seem to ignore the fact that Hennepin Parks, in their letter of June 9, 1993 to "Coon Rapids Dam Neighbor" has indicated that the future of the dam is in question. In the enclosed flyer they state, "Hennepin Parks may have no choice but to remove the Coon Rapids Dam..." if hydro-electric generation is not feasible. This would seem to be a point of significant potential impact and should perhaps be addressed in the plan.

Thank you for the opportunity to participate in the process, and keep up the good work!

John M. Haviland
[redacted]

c: City of Champlin, MN
Minnesotans for the Mississippi

September 7, 1993

Superintendent, Mississippi National River and Recreation Area
175 East Fifth Street,
Suite 418
Box 41
St. Paul, MN 55101

Dear Sir:

I have been reviewing the Draft of the Comprehensive Management Plan Environmental Impact Statement dated June 1993. It list three alternative federal actions:

Alternative A--no action

Alternative B-- resource protection, more restrictive land management etc.

Alternative C--increased development, increased tourism and new commercial and industrial development etc.

I feel the best course of action has two parts (1.) Alternative A--no action and (2.) kill the whole program at the federal level. My reasons are listed below. The list is not necessarily in the order of importance.

1. Page 2 "...However, in spite of the excellent efforts of individual cities, there is a general lack of coordination in the corridor.... that this plan seeks to correct."

   The text of the entire project is that somebody in the "Beltway" has a better idea on how the local people should be doing things. Therefore, we ("we in the beltway") are going to take it away from them (the state and local populace) and have the UPS do it properly. The UPS does have a proven track record of increasing traffic flow into an area. And we all know that the more people in an area the more damage to an area is done. Sounds like a great plan--bring in more people into a fragile area.

   To better understand the thought process of how the "Beltway" feels about the abilities of the locals read page 4. "...As use of the river and adjacent lands in the corridor grow, there is increasing potential for conflicts between usea." I ask --"who is better equipped to resolve these differences? Someone locally or someone in Washington."

   Solution--consistent zoning laws written and enforced. I am not saying the river is not fragile. But I am saying it is better done at a local level. With this act the local say is of no importance. Despite what I say or any others who may object to this project--the UPS will control all decisions.

2. Page 10 "...One issue raised periodically during the course of this planning process but not addressed in the plan is the concern that this project is the first step by the National Park Service to gain control of the entire Mississippi River from Lake Itasca to the Gulf of Mexico. <u>There is a separate study currently being undertaken by and independent congressionally established commission, the Mississippi River Study Commission, to determine the feasibility of designating the entire river as a national heritage corridor. The National Park Service is providing some staff assistance to that commission, but it does not control the results of the study."</u> <u>THERE IS REASON TO BE CONCERNED!</u>

   As an example, consider the fact that currently rumors have it the U.S. Fish and Wildlife have a hidden agenda to gain control of as many waterways as possible through the use of the endangered species act. The U.S. Fish and Wildlife's internal memo's concerning these matters are considered "privileged" and are not accessible through the freedom of information act.

   Having read what congressman Penny has been saying about the power of the bureaucrats and their lust for more it is easy for me to assume the same to be true of this whole project. It is only the tip of the iceberg. I have yet to see less government involvement--in anything.

3. Finances

Page 85	Harriet Island	$10,000,000
	St. Anthony Falls	2,300,000
	Wayside exhibits	180,000
Page 86	Annual NPS salaries	1,288,000 per year
	Maintenance	180,000 per year
	DNR Salaries	300,000 per year
	Cost of land	<u>NO ESTIMATE POSSIBLE</u>

   This is a typical boondoggle. The government wants to start a project without a cost on the main ingredients--the land to put the buildings on nor the land they want to condemn and take into the corridor. The taking of land is another story--we need but ask the American Indian how honorable the U.S. Government is when it comes to taking land.

   Page 20 "...Unlike many floodplain management programs where the long term goal is to remove structures from the 100-year floodplain, this plan is to preserve existing conditions." This could be interpreted to maintain the Coon Rapids Dam. While I enjoy the benefits that dam brings to me I don't think

500

the taxpayers in other parts of the country should pay for its replacement. I know people in positions of authority will say it won't happen--stranger things have happened.

4. The idea of continuous bicycle trails etc. along the river sounds romantic. However, the more people brought into an area the more damage they do. The banks of the river are fragile. Let's protect them in a manner that is consistent with good ecological sense--that is don't make the land easily accessible.

5. The idea that only the federal government can provide us with this corridor is wrong. If there is to be a corridor along the Mississippi--let the people of Minnesota do it. We have the people and the talent. If the will is there we can find the moneys to do it--and do it better and more economical than the U.S. Government.

6. By doing nothing we can save $12.5 million dollars in construction expenses--not to mention land expenses and trails etc. Using President Clintons math of reducing the need for staff at $1.788 million per year--by the year 2,000 we will have reduced the deficit by over $23 million dollars. The way the government works it probably will be more.

Sincerely,

John D. Tracy, Ph.D.

cc: Carlson, Durenberger, Wellstone, Grams

September 9, 1993

United States Department of the
Interior - National Park Service
Mississippi National River and Recreation Area
175 East 5th Street Suite 418 Box 41
St Paul MN 55101

Dear Superintendent,

Regarding Draft for Mississippi National River Comprehensive Management Plan.

I am very happy that this plan has been developed. Returning the river and river front to its natural state is wonderful. The Mississippi River is one of our greatest assets and we need to do what we can to preserve its beauty and keep it clean. It is exciting that people will have a way to better enjoy this natural wonder.

As a part of this plan, I support the following concepts:

-Offering support, assistance and resources to cities, towns, and groups of individuals who are working to have recreational trails that will connect communities and parks up to the river trail.

-Helping communities develop policies to protect natural resources and historic sites.

-Offering technical assistance and education to communities interested in raising creeks that have been buried in the storm sewer system.

-Promoting non-motorized use of the river.

-The potential of many other trails being developed to connect with this trail.

-Providing all citizens with an opportunity to enjoy the river.

-Considering recreational uses of the river as being of the same importance as economic uses.

-Restoring and protecting natural wetlands.

-Protecting our needed open spaces.

Thank You
Sincerely,

Karin DuPaul

Karin DuPaul

[redacted]

September 8, 1993

Superintendent
Mississippi National River & Recreation Area
175 East Fifth Street, Suite 418
Box 41
St. Paul, MN 55101

Sir/Ms.

As property owners on the Mississippi River for over 28 years we are extremely concerned about the proposed plan for the Mississippi.

The plan lacks specific information and indicates that additional authority will be given to the Department of Natural Resources and the National Park Service which will consequentially create more paper work, more confusion, more delays as well as the lack of concern for the homeowners.

The management of the

Mississippi River Corridor, has been recognized as having preserved the river in good condition. Why not work with the existing organization and not create an organization or add so many new groups to the existing organization that the original gets so divided it becomes ineffective, cumbersome and wasteful.

Sincerely,
(Mrs) Jean W. Mahaney
Lloyd W. Mahaney

Sept 9, 1993

Dear Superintendent

I am writing concerning the Mississippi River Corridor.

We live on the river and have never received notice of proposed changes or additional regulations as would apply to our property.

Visiting at the MRCC booth at the State Fair I was informed that local governments would always have the final say in any proposed changes. Also they informed me that bike paths etc. would never be put in front of existing homeowners river property. I would like to see that in writing.

It seems that local management of the River corridor has preserved the river in good condition for over 140 years. Why spend our tax dollars with another layer of government? I understand ten people have been hired so far for this unnecessary task.

Sincerely,
A concerned tax payer
Paul Wallestad

Keith Harris
[redacted]

MNRRA-comment
175 E. 5th St STE 418 Box 41
STP MN 55101

To the Commissioners

I have only recently heard about the MNRRA plan and as someone who has lived in this area for about 12 years I would like to express my thoughts. I have not had time to review the plan as closely as I would like to and so will be general in the nature of my comments.

I endorse the idea of a plan for development of the Metro area River corridor. This area has grown rapidly and without an orderly plan will, I believe, lose many of the attributes which have made this a good area to live in.

I support the idea of a strong central authority to govern the River in the metro area. The many competing agencies have to often not completed the job of river protection. Their are many abuses along the River that are only a technical compliance and any reasonable person can see that they are degrading water quality. I think one agency should have a charge to oversee the others and have some sort of leverage on decisions made by other agencies.

Living near the River I support a continuing of the trail system along the corridor. The idea of trails appears to have become a standard metro wide and the River should be updated as all the suburbs now also have trail systems. The River system should be the key and the goal of other suburban trail systems.

I object to the barge industry use of single hulled barges in the corridor. It should be mandatory that these be removed from this area. The barges are subsidized to a great degree by low fuel prices and taxes that do not reflect the cost of keeping the River open to their navigation. In the light of all that, I see no reason why they should not agree to this small concession.

I support the economic features of the plan especially those that support small business. I have changed careers several times in the 1980's and no longer believe that big business will provide any jobs. They are just not hiring people and when they do its temporary. The plan should consider the needs of small businesses and especially those which might benefit from the general improvement of the area and more tourism.

Sincerely,
Keith Harris

September 10, 1993

Superintendent
Mississippi National River and Recreation Area
175 E. 5th Street
Suite 418, Box 41
St. Paul, MN 55101

RE: Mississippi River Coordinating Commission and N.P.S.

I am writing this letter to explain my position, as a homeowner on the Mississippi in Anoka, and as a lifelong (48 years) resident of the Anoka area of the Mississippi. We have owned our 185 feet of river frontage since 1985, but I can tell you that the Mississippi has been known to me and my friends and relatives intimately for four generations.

I have used the river as a fishing hole, a water skiing lake, a swimming area (had my first swimming lessons at Rice Street Beach), and love the way the River has been accessible to me, my fellow Anokans, and my friends from other communities.

I detest any idea that smacks of making this a "wild and scenic" area or one controlled more extensively than it has been by any governmental agency/agencies. The Mississippi has been used for recreational and commercial purposes in our area since the 1840's - Anoka, because of its position in commerce on the Mississippi, at one time having been considered as the State Capital.

The way the river used today is, without question, the best use of this resource and should continue.

I would make only one suggestion. There is a need for policing of individual homeowners and companies dumping refuse and human solid waste into the river upstream of Anoka. I was going to say "stronger policing", but I have not witnessed any policing to date.

Thank you for your hard work and planning. We are very concerned about any approach that limits our use, but we are pleased that you have taken an interest.

Sincerely

Ronald G. Chamberlain
[redacted]

MNRRA Comment Sheet

Name: Karen Kvavik

Group/ Company: (If Any) [redacted]

Address:

City/State zip [redacted]

Comments

I Support MNRRA - managed by Met's Park Service. Improvements so far are wonderful but it needs an overview & coordination of MNRRA plan

Thanks

K

-over-

National Park Service
Mississippi National River & Recreation Area
Galtier Plaza, Suite 418, Box 41
St. Paul, MN 55101-2901

(612) 290-4160

MNRRA Comment Sheet

Name: Jeff Koon

Group/ Company: (If Any)

Address: [redacted]

City/State zip [redacted]

Comments

Keep it as pristine as possible. And clean.

-over-

National Park Service
Mississippi National River & Recreation Area
Galtier Plaza, Suite 418, Box 41
St. Paul, MN 55101-2901

(612) 290-4160

COMMENTS

MNRRA Comment Sheet

Name: Greg Brosacker

Group/ Company: (If Any)

Address: [redacted]

City/State zip

Comments

MNRRA Tighten up the Ambiguities in the Draft Comprehensive Management Plan EIS. I Am very Concerned that future regulations will broadly interpret The Management Plan to be more restrictive Than was originally intended. This could result in negative (ie. NEPA significant) economic impacts to the regional economy.

-over-

National Park Service
Mississippi National River & Recreation Area
Galtier Plaza, Suite 418, Box 41
St. Paul, MN 55101-2901

(612) 290-4160

MNRRA Comment Sheet

Name: Sally Potter

Group/ Company: (If Any) Small business owner (sports store - not camping, etc.)

Address: [redacted]

City/State zip

Comments

There are always places for business.
There is never enough green space.
Do not give in to politicians and business people.
Keep lots of wild space, green space places for long hikes - away from everyone
(I was just at Glacier = Wonderful!)

And once it's gone, it's too expensive, and hard to bring back. So it's not brought back.
And we all suffer.

-over-

National Park Service
Mississippi National River & Recreation Area
Galtier Plaza, Suite 418, Box 41
St. Paul, MN 55101-2901

(612) 290-4160

MNRRA Comment Sheet

Name: Al Schulz

Group/ Company: (If Any)

Address: [redacted]

City/State zip

Comments

Charge barges fair fees to cover federal tax dollar that now subsidize barges

-over-

National Park Service
Mississippi National River & Recreation Area
Galtier Plaza, Suite 418, Box 41
St. Paul, MN 55101-2901

(612) 290-4160

MNRRA Comment Sheet

Name: Sara Grace

Group/ Company: (If Any) (none)

Address: [redacted]

City/State zip [redacted]

Comments

Reduce pollution, clean up the river, return it to natural state, maintain/improve wildlife habitat, limit industrial/commercial/housing development

-over-

National Park Service
Mississippi National River & Recreation Area
Galtier Plaza, Suite 418, Box 41
St. Paul, MN 55101-2901

(612) 290-4160

MNRRA Comment Sheet

Name: Bruce Hendrickson

Group/
Company:
(If Any)

Address: [redacted]

City/State
zip [redacted]

Comments

We need to spend and take great care of our river and lake's. As they are a great resource for All to enjoy and generate revenue for many people

-over-

National Park Service
Mississippi National River & Recreation Area
Galtier Plaza, Suite 418, Box 41
St. Paul, MN 55101-2901

(612) 290-4160

COMMENTS

MNRRA Comment Sheet

Name: Jason Gabler

Group/ Company: (If Any)

Address: [redacted]

City/State zip [redacted]

Comments

Lights are not always on along River Road at night. Otherwise great.

-over-

National Park Service
Mississippi National River & Recreation Area
Galtier Plaza, Suite 418, Box 41
St. Paul, MN 55101-2901

(612) 290-4160

MNRRA Comment Sheet

Name:

Group/ Company: (If Any)

Address:

City/State zip

Comments

Provide off-road biking or allow access to mountain bikes

-over-

National Park Service
Mississippi National River & Recreation Area
Galtier Plaza, Suite 418, Box 41
St. Paul, MN 55101-2901

(612) 290-4160

RECEIVED SEP 10 1993

To the MNRRA Planning Commission,

As a Minneapolis resident and someone who works in very close proximity to the Mississippi River, I wish to express my grave concern about the state of this vital river. I would also like to say that MNRRA has an extremely important role to play in shaping it's future. Firstly, the water quality is very poor. Stringent environmental controls must be implemented as soon as possible.

I have recently been made aware of the corridor-trail-system proposal and also feel this (as an outdoor enthusiast) is a wonderful plan. Minnesota is so beautiful, this should be shared w/everyone.

Above any of these concerns is the importance of regional wetlands. The recent flooding is the best evidence of all. Wetlands would allow heavy rains to re-enter the river more slowly, obviously minimizing the impact of flooding. They are also valued as home to thousands of species of birds, insects and mammals. These should be considered state treasures.

Finally, the state of the river would also be helped considerably by the addition of no-wake areas, and general encouragement of non-motorized recreational vehicle use. Canoeing is an important part of our heritage.

I hope you will take these considerations into account when considering the fate of our river. Thank You

Brian Oakes

RECEIVED SEP 10 1993 August 5, 1993

The MNRRA Commission,

The Mississippi River is important to me as a native Minnesotan for several significant reasons. I am deeply concerned for it's future and feel that we must take direct action to preserve and heal the river and save it from further environmental degradation. The minimum standards for survival are not high enough for the largest river in the country. We must take responsibility for our actions and begin to think about our Children's futures.

Please address the water quality of the Mississippi River. Right now it is not safe to eat the fish, swim or drink the water from the River. We do not have enough time to wait for another government braucracy to save us. They do not depend on or live on the river. a corridor trail system is important for us to appreciate the river's beauty. Children cannot protect and defend something they have not seen.

Preserving and protecting wetlands, which filter out pollution, harbor endangered species and prevent flooding must also remain priorities.

Respect for other cultures will not be taught by words alone. The Mississippi River is a spiritually necessary piece of Native American life. How can we pretend to value other's culture while systematically destroying their culture. It is insensitive and unjust.

Thank you for your work and please take the views of the people of Minnesota into consideration.

Sincerely,

Michelle Lee

[redacted]

RECEIVED SEP 1 0 1993

August 5, 1993

To The MNRRA Commission,

It is my understanding that the MNRRA planning process is coming to a close. It is my concern that the draft plan neglects the needs of the environment & citizens in favor of the wishes of large corporations. As the plan is being revised, I urge you to put a stronger emphasis on the following points.

(1) Water Quality — The waters of the Mississippi River are not swimmable, & I certainly wouldn't eat the fish from it. This is a disgrace, & must change.

(2) A Corridor Trail System -- This would encourage recreational use of the river in a way that does not harm the environment, & it should extend the entire 72 miles.

(3) Protect & Restore Wetlands — This would improve the water quality, provide flood control & protect the many species that live there.

(4) Encourage non-motorized recreation use of river -- Commercial motorize use of the river have made non-motorized use difficult if not impossible. Provisions must be made to allow safe non-motorized use.

(5) Native American Cultural Sites -- These sites have long been ignored & often destroyed in this part of the country. It is important that work is done in cooperation with Native American leaders to see that these sights & presented & treated respectfully.

Please see that these points are worked into the next draft of the plan, and

(over)

Thank you for your consideration.

Sincerely,
Bill Snyder

Bill Snyder
[redacted]

RECEIVED SEP 10 1993 8/5/93

MTRRA Planning Commission

I am writing to you today to voice my concerns and hopes for your draft plan.

I would like to encourage the Planning Commission to focus upon environmental concerns for the establishment of the Mississippi National River and Recreation Area.

The five areas of main concern for myself and my family are as follows:

1) That MTRRA strongly encourages a high standard of water quality in the area.

2) That a corridor trail system for bikers and hikers is established along the full seventy-two mile stretch of the river.

3) That a firm and lasting protection of wetlands resources be put in place to stop any degradation of current wetlands.

4) That non-motorized recreational use of the river be encouraged.

and finally:

5) That a stronger emphasis be placed upon Native American cultural sites; and that Native American input be strongly considered in any decision where MTRRA is concerned

Thank you for taking time out to consider my concerns in this matter. Please do seriously look at these five points.

Thank You Again,

Quinten Crowe

Dear MNRRA Planning Commission, RECEIVED SEP 1 0 1993

I am writing this letter in support of the of the corridor trail system along the Mississippi River. The river is one of the states natural wonders and should be made accessible to the general public. I am also deeply in favor of the preservation of the Native American cultural sites.

To enhance the serenity of the river area I also back the non-motorized recreational use of the river. Also we should learn from all the recent flooding that we must protect and restore the wetland areas around the river.

Please consider all these points when you vote on the draft plan.

Sincerely,
Mike Rad
[redacted]

RECEIVED SEP 1 0 1993

8/5/93

Dear MNRRA Planning Committee,

In reference to your Draft Plan, I'd like to thank you for any additional emphasis you could place on improving the water quality of the Mississippi River. The current water quality is really shameful - the Mississippi begins here in Minnesota, but is polluted beyond swim-ability before it even leaves our borders. What kind of an example are we setting for the other states the river runs through.

In addition, I'd like to encourage your efforts in setting up a corridor trail system and protecting wetlands. Furthermore, your plans for encouraging non-motorized recreational use of the river are a good idea and should be expanded.

Sincerely,
Denise Hardy

RECEIVED SEP 10 1993

Aug 5, 1993

To MNRRA Planning Commission

I am writing to you as an avid fisherman, canoeist and cyclist. This past year I have spent "90" for a canoe, "500" for a new bike and an unknown (although I am sure substantial) amount on fishing gear. I would like very much if I could be able to pursue these hobbies on a non-polluted, non-motorized and fairly pristine stretch of the Mississippi river. I'd make is not so much to ask.

Sincerely

MNRRA Planning Commission,

8-5-93

RECEIVED SEP 10 1993

I would like to urge you to include a strong emphasis on the following points in your draft plans for the Mississippi River corridor in the Twin Cities Metro Area:

1. Strong standards to protect water quality.
2. An unbroken trail system for pedestrians & bicyclists the entire length of the corridor.
3. An emphasis on protecting and restoring wetlands
4. Encouragement of non-motorized recreational use of the river.
5. Protection/restoration of historic sites, especially native american cultural sites.

Thankyou.

Greg Maas

RECEIVED SEP 1 0 1993

MNRRA Planning Commission: Aug 5, 1993

I would like you to include in the draft plan provisions which include the following:

1. Protecting water quality
2. Restoring lost wetlands and protecting existing wetlands. This is extremely important because of the recent flooding.
3. Encourage non-motorized recreational use of the river.
4. Include Native American Cultural Sites along the way.
5. A Complete Trail system spanning the full 72 miles of the river. This is extremely important to make sure the park is accessable to all. This should include both walking and biking paths.

Thank you for your consideration on these matters.

Sincerely

Mary Brady

[redacted]

To MNRRA Planning Commission:

I am writing to express my concern about improving the water quality of the area near the Mississippi River.

I support the work being done on the draft plan but would like to encourage much improved water quality, the protection and restoration of the surrounding wetlands and the Native American Cultural sites. I also am in support of the Corridor trail System and the Non-motorized recreational use of the river. The full 72 mile corridor trail system is encouraged.

Please take into account the environmental concerns of this area!

Thank you!

Diane Freeman

RECEIVED SEP 10 1993

Aug. 5. 1993

To the N.M.F.F.A. planning commission.

I would like to see a stronger emphasis on the following points:

1. Water Quality.

It's a shame how poor it's become.

2. Corridor Trail system,

Has there been an upsurge of homeless people & derrilicks demanding access into Bridley?

3. Protect + restore Wetlands,

The main reason for is "Natural" flood protection.

4. Native American Cultural sites,

Seeing as we seem to have destroyed the land, maybe we could use their insite.

Thank You. A. Hudson

RECEIVED SEP 10 1993

[redacted]

July 28, 1993

Attention MNRRA Commissioner:

I am concerned with the current MNRRA draft plan. I feel that several issues are not being addressed, and these should be of utmost concern when planning for use of the Mississippi River corridor.

My concerns begin with environmental quality. Without pollution controls, we may lose the use of this valuable resource for future generations.

Secondly, the development of a corridor trail system is essential for recreational use. As a bicyclist, I would love to be able to travel down the Mississippi on the corridor trail.

Next, the protection of wetland and open areas is vital. We need only look at the serious flood problems this summer to realize the need for wetlands protection.

Fourth, encouragement of non-motorized vehicles should be included in the plan. Because of their minimal damage to the ecosystem, these non-polluting vehicles are clearly preferred to other forms of transpodation.

Lastly, preservation of Native American cultural sites should be a clear goal. These sites have intrinsic historic value.

In conclusion, these five areas must be clearly addressed in the MNRRA draft plan in order to have a complete representation of the Mississippi corridor users. Clearly the current draft does not address these areas, and I feel it represents corporate interests without considering public opinio

Sincerely,
Christine T. Canard

RECEIVED SEP 10 1993

July 28, 1993

The MNRRA Commission:

As a new resident to the Twin Cities, I feel this plan for a park is vital to the cultural history of the area. I grew up on the Missouri and understand the value a waterway such as the Mississippi has to offer. History and cultural influences help us all remember where we are and the richness of the past remind us all of the friend the Mississippi has been to us. It is time for us, as concerned citizens, to be a friend to the river.

The water quality of our rivers should be an on-going fight. Above all, a ~~the~~ national park should be an example, not a continuing embarrassment to existing fishable, swimmable standards. In this, the protection of the wetlands and open areas are crucial to healthy maintenance to the river.

It only makes sense that this area be enjoyed through non-motorized recreation and bike trails. The river should be part of the natural experiences in Minnesota.

It is a part of the cultural experience of all Minnesotans, Native American included! Please remember this when considering your final decision. We trust you will decide for the best of the River, and the enjoyment of all the citizens of the State.

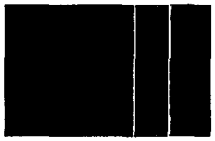
Thank you

Ed Hurd

[redacted]

09-28-93

To MN RRA



IS RECEIVED SEP 10 1993

IS RECEIVED SEP 10 1993

Dear Sir / Madame;

I urge you all to work hard to protect the Mississippi River Area declared as a national recreation by implementing the following key points which are critical to the preservation and sustainability of the enmarked area for future use by future generations.

1) First Guarantee and ensure highest standard of water quality along the Mississippi river.

2) Protect and preserve our wetlands

3) Ensure non motoized vehicles on the Mississippi

4) Allow a Corridor trail ie Bicycle trail

I strongly believe that these key points will allows the Sustainable use of this enmarked recreational area, reduce the impact of floods as wetlands act as storage areas and most important Set a Standard to be implemented by other states throughout the United States of America.

Remember, this will bring tourism and new revenue to the State, which brings this letter to the final Conclusion, that a strong environment always leads to a strong economy and not vice versa.

Thankyou very much for your assistance & Cooperation look forward to hearing from you shortly

Yours Sincerely

PETER I. IDUSOGIE

RECEIVED SEP. 1 0 1993

July 28, 1995

To the MNRRA Planning Board:

I'm writing as a concerned citizen regarding the MNRRA Draft Plan. The Plans five points are part of major environmental and cultural concerns to all Minnesotans.

First, the environmental and water quality of the Mississippi River between Brainerd and Hastings has become increasingly bad over the years. The Draft Plan would address these issues and work toward remedies to help us reclaim this vital waterway for something other than barge traffic.

Secondly our wetlands are vital. If you doubt that, speak to the flood victims throughout the Midwest where situations could have been mitigated if more of our wetlands had not been wiped out.

Third, about the last thing required for the health of the Mississippi is more motorized river traffic. Let us enjoy its beauty without the use of engines.

Finally, let us develop and use corridor trails. It's an integral method to allow us all greater use of our river and its surrounding environs.

Thank you for your concern,

Robert Juarez

[redacted]

521

RECEIVED SEP 1 0 1993

28 July 1993

MNRRA Planning Commission:

Living in Minneapolis, any project to be carried out on the Mississippi River will affect me, as it will many others. I realize the need for careful deliberation. I am in support of MNRRA's idea for making a park area of the Mississippi corridor here in Minnesota. But there are a few points that I think should be dealt with very carefully.

I would like to see careful consideration of the following issues:

1. The Quality of our water being maintained.
2. The Protection of our wetlands.
3. The non-motorized use of this area for recreation.
4. The possibility of a corridor trail from Dayton to Hastings, Minnesota.
5. Involvement of those people who will uphold The Clean Water Act, regardless of pressure from business enterprises to compromise Standards.

I hope that MNRRA will not let business interfere with ~~their~~ original goal: to create a park and recreation area. Please stay true to your intentions, much support will follow.

Thank You,

Katherine J. Walker

RECEIVED SEP 1 0 1993

7-27-93

MNRRA Commissioners,

I have recently become aware of this planning commission's steps to create and maintain a National Park along the Mississippi River. I fully support having a park in Minnesota however, I urge you to make some important changes to this plan. These are as follows:

a) thorough consideration of water quality in this "corridor" and steps to ensure safer water quality
b) real efforts to restore and protect wetland areas along the river
c) giving adequate time for recreational non-motorized vehicles on the river
d) permitting a bike trail within the corridor so that the river can actually be enjoyed as a natural resource
e) insisting on citizen representation (on this board) from the Native American community, as the river has deep religious and cultural value to the people of their nation

Please consider these carefully. It is important that all peoples have the chance to enjoy the Mississippi and the areas around it. Please Respond.

Kathleen J. Coughlin

Kathleen J. Coughlin

[redacted]

523

RECEIVED SEP 1 0 1993

TO: the MNRRA

The Mighty Mississippi is a valuable resource for Minnesota and the entire Country. We must respect and protect this national treasure.

Please incorperate the following points into your plan to enhance this corridor: 1. Strong water quality standards

2. The protection and restoration of wetlands

3. Non-Motorized recreation

4. a complete bike path

5. respect and recognition of the native influence on the area.

thank-you

Peter Youngs

RECEIVED SEP 1 0 1993

Dear MNRRA Planning Commission,

I recently was briefed on the plan for the Mississippi State Park located on the Mississippi River with many of the comprehensive plan to have out some key issues involving the park. I felt I need to write to you!

The most important issue that was on my mind in the issue of clean water. I was glad to think that water quality would be the top issue of the commission.

Other hand-in-hand with water quality is wetlands protection, given the fact the upper Mississippi is heavily industrial, wetlands are crucial in filtering out waste.

Also brought up are non-motorized recreation and the bike trail along the river.

I urge the commissioners to be aware of these factors and realize that MNRRA can mean these and more recreation.

Thank You.

Jim McKinney

[redacted]

July 28, 1993

RECEIVED SEP 1 0 1993

Members of MNRRA,

As a concerned citizen of this State. I am seriously bothered about the draft plans which is before you at this time. From my recollection there a couple of point missing of this plan that needs attention water quality, the protection the wetlands, there is defiantly a need to reduced the amount of motorized vehicles on this site. A connector trail must be created and finally the protection of the Ingenous people site. Thanks for your support

John Holdorf

RECEIVED SEP 1 0 1993

Dear. M.N.R.R.A

my name is Raed yunis
I'm one of the pepole how
Like to see dange and I agree
about

1) water quality
2) protect wet lands
3) NON-motorized
4) corridor trail

I wish Luck

Raed

MNRRA Planning Commission

RECEIVED SEP 1 0 1993

The MNRRA Plan needs to emphasize these five points: ① Water Quality needs to be inproved to fishable & swimmable standards.
② Wetlands & Open Spaces need to be protected.
③ Non-motorized recreational use needs to be encouraged; ie canoes.
④ As a cyclist, I would like to see a corridor trail through this Park.
⑤ The spiritual and social significance of this river to America's Indiginous Peoples needs to be acknowledged, both out of respect for these folks and as an educational resource for Minnesota's citizens.

This can be a great asset to our state.

Sincerely
Michael Gibbons
[redacted]

To MNRRA commission: RECEIVED SEP 1 0 1993

I strongly urge you to consider the non-motorized plan for the recreation Area. By doing this, it will provide a much cleaner and also a quieter piece of river for all to enjoy.

Please also consider the other four very important points of the proposal. As a very concerned + informed citizen, the Mississippi River is a Flowing body of water which needs your approval on the 5 points.

Thank You,

Scott Wilson

RECEIVED SEP 1 0 1993

July 27, 1993

Dear MNRRA Commission,

I am a tax-paying, home-owning, regular voting and long term citizen + resident of St Paul, Minnesota.

Today I am urging your complete support of the MNRRA draft plan with these 5 basic principles:

1. assessment of Native American cultural sites
2. a system-wide trail system for recreational use; ie walking/running/X-C skiing/biking
3. other non motorized recreational use.
4. protection of wetlands + open spaces
5. protection of water quality + full compliance with Clean Water Act with no waivers + no exceptions.

For goodness sake, were upstream over 400 miles to literally millions of the US Citizens + residents. This river is precious. This river is the single greatest natural resource in our state. Please think long term + sustainable. Thank you.

Tom Fuhrman [redacted]

RECEIVED SEP 1 0 1993

MNRRA Planning Commission,

I support the creation of the Mississippi Recreation Area. If the area is set aside through it, it is paramount that the water quality level rise. In addition, protection of wetlands and wildlife habitat within the corridor,

The creation of this area would be unique in an urban setting. Therefore, access needs to be restricted in the form of non-motorized traffic within the corridor, but with provisions for access on land such as a bike path or walkway.

The spiritual and religious significance that the Mississippi holds for Native American beliefs must not be discounted. At the bare minimum, they must be included in the process. At best, policymaking to include Native proposals, consultation, and recommendations to help make better the corridor for all Minnesotans.

Sincerely

Terry Ann Vandeleer

527

To: 7/28/93

Mississippi National River & Recreation Area

RECEIVED SEP 1 0 1993

I'm writing to you as a concerned Minnesotan resident. I'm deeply disturbed by the MNRRA draft plan which might have disastrous consequences as far as the water quality of the river, the wetlands protection, etc. The discussed piece of land along the river should be protected as the National Park, and preserved for the future generations. I urge you to act promptly on this issue by taking our "concerned voices" into consideration!

Thank you for your action.

Sincerely,

Miriam Walesk[redacted]

RECEIVED SEP 10 1993

Dear Planning Commission

I urge action for protecting
the area within your jurisdiction
of the Mississippi National River:

1) water quality
2) wetland protection
3) motorized vehicle restrictions
4) a trail for pedestrians and
bicyclists
5) consultation and input
from the native American community

I am a lifetime resident
and voter in Minnesota and
grew up along the Mississippi
River. Please help create an
avenue for citizens to enjoy
and appreciate this great
water way and preserve it
for our future generations.

Thank you for your actions,

Sincerely,
Laurie Erickson

[redacted]

RECEIVED SEP 10 1993

Dear Dino

As a Minneapolis resident the
concept of a National Park along the
Mississippi River gladdens and excites
me as it undoubtably does thousands
of my neighbors. Unfortunately, as a
citizen concerned about our shared environment
the plan distresses me greatly. The
lack of concern concerning point source
pollution, channel dredging, and water quality
in general shakes my faith in governmental
process and begs my involvement. Please
consider the need for a protected National
Park and recreational area in the heart
of the Twin Cities; it would be a
benchmark in urban planning, environmental
protection, and social responsibility

Paul G. Zaman

[redacted]

RECEIVED SEP 1 0 1993 July 28, 1993

To: The MNRRA Planning Commission
From: Ellen E. Boroughf
[redacted]

Please, when making final your plans, pay attention to the name of your commission. It contains the word "Recreation" not the word "Business" Therefore, pay attention to water quality users will want to swim and fish. Preserve, indeed restore, wetlands. Protect this recreational area from flooding. And, please do restrict barge and motor boat traffic. Who wants to worry about being done in while having a lovely swim. A bicycle trail would be nice, too. We'd be able to get from scenic spot A to scenic spot B without emitting noise or fumes. One last question: Are any Native Americans involved in the planning? If not, why not?

RECEIVED SEP 10 1993

The MNRRA Commission-

As a concerned citizen, I urge you to include some specific points into your project.

First, please take into account the need for better water quality and the protection of the wildlife in the Mississippi River.

Second, the protection of the Wetlands is a ~~crutial~~ crucial and vital part of this project. As I hope you understand, the Wetlands provide a natural filteration system for our water quality as well as housing for many endangered species.

Third, it is crutial that [redacted] motorized vehicles be prohibited from this area. Not only are they a major source of pollution

(p.2)

on our rivers and lakes, but to see a calm and quiet river flowing without the blaring of motors and barges is aesthetically pleasing.

Fourth, a bike trail extending from Daton to Hastings would be a major step in encouraging non-polluting forms of recreation. There are thousands of citizens and tourists that travels up and around Minnesota all year that deseave a path to walk, job or bike along a historic river.

Fifth, including Native American voices into this plans is beyond important. The Mississippi is a spiritual location for the Native American Community and

(p.3)

Please Reply and Inform me on where you stand on creating this plan ~~on~~ ~~this~~ realistic project. Stand strong on the historic and environmental issues.

Please Reply,
Tamara Gilbertson
[redacted]

RECEIVED SEP 1 0 1993

26 July 1993

Dear MNRRA Planning Commission:

I am writing to you as a concerned citizen to let you know what I would like to see happen with the Missippi River Corridor, or Park:

1) We must protect and restore the open spaces and wetlands in this area

2) To accomplish the above, we must: promote non-motorized recreational use of the river; protect and respect Native American cutural sights in the corridor and do everything in our power to protect the environment and restore the water quality in and along the river.

Your immediate attention to my concerns is greatly appreciated. Thank you!

Sincerely,
Ann Shaw

RECEIVED SEP 1 0 1993

To the MNRRA Planning Commission: 7/21/93

I am writing about the Mississippi Corridor. As a MN citizen I must express my concern with the proposal that has been brought to my attention. Above all considerations, there must be a definitive dedication to the preservation of the environment and the rights of all people & with any interest in the area to be called the Mississippi Corridor.

There must be an emphasis to protect & restore open spaces & wetlands; promotion of non-motorized recreational use of the river; a corridor trail system (bike trail), Native American cultural sites & environmental & water quality. Please remember that this area is for the use of common citizens for recreational purposes & should be designed according to the goals of Minnesota constituents.

Thank you,

Tami L. Schroeder

Tami L. Schroeder

RECEIVED SEP 1 0 1993

7/26/93

Dear MNRRA Planning Commission -

I am writing to you to let you know what I would like to see happen with the Mississippi River "Corridor" (a.k.a. Park)

1.) Please bestow National Park Status upon this area.
2.) Please give less weight to large business interests (like 3M) and more to the people - this is a culturally & historically rich area - preserve it!
3.) Please develop bike & hiking trails along the corridor.
4.) Protect existing open spaces - restore previously open spaces and WETLANDS

I appreciate your Commission's consideration of my [redacted] comments. Please mull them over - and then make them policy!!! ☺

Thanks -

Laurie Barr

[redacted]

RECEIVED SEP 1 0 1993

[redacted]

TO: MNRRA Commissioner:

I am a concerned citizen writing to you about the proposed Mississippi Corridor plan. THE Mississippi River is a national wonder and should be able to be enjoyed by all people. As a citizen I want to ensure it's long lasting beauty & water quality. I also agree with all other 6 our points being: a corridor trail system - protection & restoration of wetlands - ENCouragement of NON motorized vehicles on the River & Native American cultural sites. It is extremely important to me that we as country take seriously the Land the we have the opportunity to live on & respect it's resources. We CAN No Longer pretend that water pollution does not effect our health & well Being. THANK you for your Attention.

Janice J Watson

533

RECEIVED SEP 1 0 1993

Attention MNRRA Commission

I am concerned about the future of the recreational accessibility of the Mississippi river as outlined by your draft plan and strongly urge you to include the provisions concerning:

1. the environmental quality & clean-up
2. constructing a corridor trail system for public use
3. protection and restoration of wetlands & open spaces which provide natural flood protection
4. encouragement of non-motorize vehicles & regulation of barges
5. Native American cultural cites determined with the assistance of the community.

I hope you will take my and other Minnesota citizens concerns into consideration when determining the final plan.

[redacted]

Thanks!
Sincerely,
Carly Thomas

RECEIVED SEP 1 0 1993

7-27-93

Attention MNRRA Commission -

As a Minnesota Resident I strongly urge you to support these four points:

1. Environmental and water Quality
2. Corridor trail system
3. Prevention and restoration of wetlands & open spaces
4. Encouragement of non-motorized use of River
5. Native American cultural Site.

Please DO NOT Fold to the Business, This is not a game this is our River.

Thank you

[redacted]

RECEIVED SEP 1 0 1993

7-27-93

To The MNRRA Commission:

As A Concerned Citizen Of Minnesota I Would Like To See The Following Five Points Incorporated Into This Plan:

1. Strong Environmental Quality & Control
2. A Corridor Trail System Included
3. Protection & Restoration Of Wetlands & Open Space
4. Encouragement Of Non-Motorized Vehicles On The River (Recreational)
5. Native America Cultural Sites Included.

The Mississippi River Is Too Important A Natural Resource To This State & The Country; Not Including These Points Will Endanger It Forever.

Sincerely,

Jessie K. Johansson

[redacted]

RECEIVED SEP 1 0 1993

July 27, 1993

Attention MNRRA:

I am a concerned Minnesotan over the current National River Recreation area. I would like to see a few changes such as: an environmental quality corridor trail system, prevention and restoration of wet lands, encouragement of limited use or access to large barges so that people are able to enjoy canoeing or use of other non-motorized vehicles which wouldn't cause pollution, and also to have Native American cultural sites.

I believe these changes would enhance the corridor recreation area and encourage folks to make use of the river and land nearby.

Sincerely,
Angela L. Potas

535

July 27, 1993

RECEIVED SEP 1 0 1993

Dear MNRRA/ Commission members

I am writing this letter in support of a stronger environmental quality front to be in place concerning the Mississippi MNRRA plan.

The impact of the environmental aspects of this project, are fundamental to the well being of the various communities that are effected by this project.

As responsible members of a community, we must respect the environment and encourage a responsible interaction between man and nature.

Sincerely
Ernest Stacy

MRA Commission

RECEIVED SEP 1 0 1993 7-27-93

Dear Commission Members:

Thi letter is written ~~ire~~ to ~~hope~~ encourage you to focus your attention ON the environmental issue of water quality IN the mississippi river for posterity sake. IN addition to this, the perspective of Native American tribes should be strongly considered. The mississippi river is a strong spiritual element IN native American culture; their voices deserve AN audience on this issue

Cordially,

Dolores L. Chivers

[redacted]

10 September 1993

Superintendent
Mississippi National River & Recreation Area
175 E 5th St Ste 418
Box 41
St Paul MN 55101

JoAnn M. Kyral:

This is in response to your request for public comment in re: the development of a management plan for the MNRRA subsequent to the passage of Public Law 100-696 dtd 18 Nov 1988.

We have a number of concerns about this:

1. The lack of specifics in the plan.

2. The "veto" authority granted to the MN DNR. This agency already is a prime example of bloated bureaucracy which is rampant in this state. We don't need to add another level government meddling in the lives of the citizenry, especially from this department which has exhibited its' willingness to impose its' desires on the people despite their opposition. The DNR has taken the public resources of this state and through manipulation and implementation of fees and regulations reduced the access to these resources to a point where far too many people are not able to partake of something which their taxes have established over the years, ie: re-establishing fishing license fees for people over 65! There are other abuses far too numerous to mention in this comment.

   The current process is working well. "If it ain' broke, don't fix it!"

3. From the selfish standpoint, we fail to see why we, as property owners and taxpayers, should be forced to put up with people from all areas of the U.S. traipsing across the back side of our lot(city street) much less across our water frontage. When we view what they do to their own areas plus the public roadways in this country do you want them trashing your residential area the same way?

Thank you.
Irl & Carol Larsen

Samuel H. Morgan
[redacted]

Office: [redacted] *Home:* [redacted]

September 13, 1993

Ms. JoAnn Kyral
Superintendent, MNRRA
175 East Fifth Street
Suite 418 - Box 41
St. Paul, MN 55101

Re: Draft Comprehensive Management Plan EIS - June 1993

Dear Ms. Kyral:

Back in late July I received a personal letter from Chairman Peter Gove expressing his hope that because of my longtime interest in our state's resources I would provide some thoughts of my own on the draft plan. However, after being appointed a member of the Minnesota Parks and Trails Council's Ad Hoc Committee composed of Mr. Michael Bosanko, Ms. Peggy Lynch, Ms. Kikie Sonnen, myself, and Council president Michael Prichard as chairman, I felt that the comments of this committee might adequately and accurately cover my own thoughts as to render any separate comments of mine superfluous.

However, upon reading our chairman Mike Prichard's draft comments of September 9, 1993, and discussing them briefly with him, and with fellow committee member Peggy Lynch, I have concluded that some separate comments of mine should be made a matter of record.

First, I might register strong support for the proposed Harriet Island Interpretive/Headquarters facility. For one thing the very fact that the NPS is not expected to be administering any significant amount of parkland in this unique National River and Recreation Area make it crucial, if it is to play a large role in enhancing and protecting this metropolitan area riverway, that it have a publicly visible physical presence. How better can it do this than by having an attractive headquarters and interpretive center in St. Paul, the historic head of navigation, which could be a real drawing card to the just developing Harriet Island-Lilydale Regional Park. It could give a significant boost to our city's entire downtown riverfront developments plans.

Second. I do strongly support the suggestion in the Ad Hoc Committee's comments that Grey Cloud Island be specifically identified as a prospective major new regional park in the riverway, a point I had also addressed in my remarks at one of the public hearings. I am a believer in specifics. The Grey Cloud area is probably the only possible site in the entire metro riverway where a new major park has a chance to be created and now that just since the draft plan was proposed, the Washington County study committee has reached the point of recommending a major new park at Grey Cloud, the time is appropriate for the plan to be revised to name the Grey Cloud area as a prospective major component of this riverway's recreational resources. Such appropriate recognition of Grey Cloud's potential in the Plan could encourage this park's supporters and could give support for the possible federal matching funding that is authorized in the legislation creating the MNRRA.

Third. I heartily second our Ad Hoc Committee's concerns with overlapping management. Recent personal experiences I have had in efforts to get all necessary clearances for the St. Croix Scenic Riverway have brought home to me the almost impossible burden citizens face in even trying to find out, much less deal with, all the different governmental entities involved. I can fully understand the concerns some major business interests have expressed. If NPS could help actively to develop in collaboration with the many townships, cities, counties, and other governmental agencies involved as well as with representatives of recreational and commercial interests, arrangements (a) by which citizens could go to one source of comprehensive information about all approvals needed and (b) by which consolidated hearings could be required to save time, expense, and frustration, it would be doing a great service to both environmentalists and those undertaking appropriate new activities and projects within the riverway.

Fourth. I must begin with a confession that my eyes began to glaze over at the thought of trying to go carefully through this 249-page Draft Plan. It would be most helpful to all concerned if the final Plan EIS could begin with a clear, comprehensive and concise summary of about twenty pages. This should be as specific as possible, perhaps with appropriate page references to the whole statement.

Finally. I do want to express wholehearted concurrence with the Ad Hoc Committee's recommendation that the Commission adopt, at least in large part, Alternative B.

I regret that it was not possible to get these comments in until this late date but trust that they can be considered duly received and become part of the record to be considered.

Sincerely,

Samuel H. Morgan

SHM:ar

cc: Mr. Peter Gove
Mr. Michael Prichard
Ms. Peggy Lynch
Mr. Michael Bosanki
Ms. Kiki Sonnen
Mr. Raymond Black

Grosslein Beverages, Inc.
[redacted]

September 7, 1993

Superintendent
Mississippi National River and Recreation Area
175 East 5th. Street
Suite 418 Box 41
St. Paul, Mn. 55101

RE: Mississippi River Coordinating
Commission and N.P.S.

I have reviewed the draft summary of the work of the commission. I am a life-long resident of the Anoka area, and have lived on or near the Rum River or the Mississippi River for 60 years.

I believe the best and most desirable plan is Alternate A, followed by Alternate C. My comments apply to that portion of the river I know best, namely up river from the I-694 bridge.

There are to many areas in federal hands, administered by park personnel who must make decisions based upon extraordinarily cumbersome procedures, resulting in inflexible regulations.

We have sufficient regulatory bodies - let them acquire park land, regulate river front area land use and promote greater use of the river resource. With the proposed plan I can read new restrictions on river use and broad range activities in appropriate areas. We do not need N.P.S. interpretive and administrative facilities in St. Paul and Minneapolis. Minnesota already has the largest wilderness area in the United States in the B.W.C.A.W.

This past weekend, in the area I know, we saw fish caught by many people; fish of all types, large and small, boats, jet skis, water skiers, inner tubers, pontoon boats, cabin boats, canoes, swimmers and bank sitters. There were so many different species of birds, to numerous to name; this is real life.

We live in the urban area, upstream from the I-694 bridge and it's wonderful to have a river that is providing so much to so many.

Alternate A best suits the nature of the Mississippi in the Anoka area.

Sincerely,

A. E. Duke Grosslein

A.E. 'Duke' Grosslein
[redacted]

cc: City of Anoka, Mayor and Council
Governor Arnie Carlson
U.S. Congressman Rod Grams
State Representative Charlie Weaver

Geraldine M. Drewry
[redacted]

Sept. 20, 1993

Joanne Kyral
Superintendent
Mississippi National River and Recreation Area
175 East Fifth St., Suite 418, Box 41
St. Paul, MN 55101

Dear Ms Kyral:

Following are comments on the draft Comprehensive Management Plan Environmental Impact Statement for the Mississippi National River and Recreation Area in Anoka, Ramsey, Washington, Dakota and Hennepin Counties, Minnesota.

Sincerely,

Geraldine M. Drewry

Geraldine M. Drewry

Proactive prevention of potential airport contamination is needed

Overall, the proposed plan seems like a workable balance between total environmental preservation and total development. One area causes concern.

The National Park Service should be proactive during the planning process for a potential new airport. This airport may abut the Mississippi National River and Recreation Area at Hastings. The quantity of potential water runoff and the accompanying probabilities of contamination of the Vermillion and Mississippi Rivers have not been addressed at this time by either the Metropolitan Council or the Metropolitan Airports Commission.

The Comprehensive Management Plan should include requiring the MAC to contain and recycle deicing materials at both the present airport and the possible future site.

The plan should require that runoff from the acres of concrete planned for the new airport not contaminate either river. The treatment system for runoff and the size of required holding ponds have not been included in any public discussions of the airport up to this time. There may not even be space for adequate holding ponds between the runways and the rivers. The costs of these pollution-prevention measures are not included in the cost estimates for a new airport.

The National Park Service should be a participant in the Dual Track Airport Planning Process. It should have the ability to suspend or otherwise affect that process if it does not address protection of the Vermillion and Mississippi Rivers.

[redacted]
September 8, 1993

Superintendent
Mississippi National River and Recreation Area
175 E 5th St, Suite 418, Box 41
St Paul, MN 55101

Re: Comments on Draft Comprehensive Management Plan for MNRRA

Dear Superintendent and Commissioners:

The Mississippi National River and Recreation Area (MNRRA) opens a new chapter in National Park Service experience, and offers both enormous challenges and fantastic opportunities. I want to offer my general support for the Alternative B form of the MNRRA plan, and to propound that the defining focus of MNRRA should be environmental education that is tied to positive environmental actions.

My perspective is as Minneapolis resident who has lived within a short walk of the Mississippi River in Minneapolis for twenty years. I am also studying elementary education and am a practicing part-time elementary teacher.

It is appropriate that the Mississippi River be recognized as the preeminent natural feature of the central Great Plains of North America. It is the hub of the ecological web of the Midwest. To designate this urban stretch as a National River Area draws significant attention not only to the natural history and the human history entwined with the river, but also specifically to the *interface* between the two. And therein lies MNRRA's uniqueness, its challenge and its opportunity.

How shall we, as a human culture, live with nature, and specifically with this river? Are we living in a sustainable manner? What answers does the Mississippi River offer? MNRRA's challenge is to help ask and address these key questions exactly in the face of apparent conflicts, and in the face of a sick river.

The MNRRA corridor juxtaposes two million people with a vital natural feature. MNRRA's opportunity is not only the immediate community of millions, but also the fact that the river offers a close, tangible feedback mechanism. The river's health reflects our own health as a human community. If two million people can learn to live harmoniously with the river (we *can*), our success offers a wellspring of hope for our children (many of whom struggle with despair) and for the future of humankind. Offering *hope* is MNRRA's greatest opportunity.

Successful environmental education does not end with beautiful interpretive signage, interactive computer simulations, nor even with the best understanding of complex ecological processes. Environmental education must be coupled with action. If it is not, people learn that it is okay to talk good talk without doing anything differently; or the lesson may be that addressing difficult (albeit crucial) problems is not, after all, realistic. But if it is coupled with action, people will find hope. And hope begets more action.

Action in the form of proactive pollution prevention and river restoration activities should be the hallmark of MNRRA. To this end, MNRRA should designate specialist personnel in these areas to work alongside environmental education personnel. I strongly support the MNRRA plan's proposed policies and actions regarding Natural Resource Management (pp. 40-41) and the Alternative B refinements in this area (pp. 96-97).

Consistent with the previous comments, I suggest that the General Concept of the MNRRA Management Plan (pp. 17-18) be rewritten in the manner of Alternative B, but with a focus on environmental education. (E.g., *The central concept of MNRRA shall be to emphasize environmental education which is coupled with aggressive resource protection and enhancement*...) I fear that the "balanced use" and "managed growth" terminology of the proposed plan is a subterfuge which will lead to a further sacrifice of river ecosystem health (and human health as well).

Regarding Visitor Use and Interpretation, the "visions" referred to under the subheading "Interpretation, Education and Visitor Services" (p. 52) are incomplete. The visions should include the following:

The public understands the interconnections of the river with their own lives, and supports their understanding with actions.
The public is aware of the basic requirements for a healthy river ecosystem, and identifies the health of the river as a symbol of a successful relationship with nature.
MNRRA visitors gain motivation to take personal actions that benefit the river ecosystem.

The second vision statement of the draft plan, related to "multiple uses" of the river (p. 52), is confusing and should be deleted. The Alternative B suggestions should be incorporated into this section. The Interpretive Themes (pp. 53-56) of this section — especially numbers 3,6, and 7 — are essential assets to the MNRRA plan.

I am pleased that the National Park Service (NPS) will soon have an opportunity to help bring the natural world into the lives of urban people who increasingly feel estranged from it. It is my hope that MNRRA will be fashioned as a model for a sustainable relationship between humans and the rest of nature. I hope that with MNRRA's help, our community on the riverbanks will be able to see ourselves as a part of nature, not apart from it; and that we may learn that whatever we do to the river we do to ourselves. We will live together, the river and the city, as two healthy communities, knowing that both must be healthy for either to be.

Thank you for your consideration.

Sincerely,

Lyndon Torstenson

Please note: *All* underlining denotes suggested language.

9-6-93

Superintendent - MNRRA,

Dear Sir,

We are homeowners living on the Mississippi in the City of Ramsey. There are many rumors circulating as to what might take place in and around our properties. We have seen the draft plan (MNRRA) but no specifics for our immediate area were listed (major ones) so it's a little difficult to comment.

What many of us would like to see are some regulations of power driven crafts during the high water seasons. During this unusual year of high water our river banks are taking a beating not only from the river currents, but also from the wake from the many boats taking advantage of the high water to get upstream - especially the larger boats.

Around twenty years ago we had representatives from the DNR and the Corps of Engineers out to see if something could be done to divert the fast and deep water near our shores. They said it could be done by blowing an island out upstream - which was out of the question. It's hard to sit and watch the erosion process eating itself north.

We surely don't need more complicating things along the river.

When will we find out what the specific plans are for our area?

Thank you —

Don and Molly Anderson

Don & Molly Anderson

[redacted]

Rhona Wetherille
[redacted]

October 4, 1993

JoAnn Kyral, Superintendent
Mississippi National River & Recreation Area
175 East Fifth Street, Suite 418
Box 41
Saint Paul, Minnesota 55101

Dear Superintendent Kyral:

I have read the draft of the comprehensive management plan for the Mississppi National River and Recreation Area of Minnesota. I was alarmed at the main proposal and wonder whether we need the proposed additional tourist activity in the Twin City Metropolitan Area. One can quickly imagine the huge amounts of money which would be spent on the project, starting with the two proposed major interpretive centers. Do we really need to allocate federal funds for such a project in this time of federal fiscal belt tightening? I think not. Therefore, my recommendation is Alternative A--take no action.

Living along the river in Minneapolis as I have done for the past 20 years has given me somewhat of a feel for the amount of traffic already on the river, both commercial and recreational. I also have friends who live on the river near Anoka, and have heard them talk of the boat traffic. I have been boating on the river and found it a harrowing experience, especially near the locks, where many boats mills around awaiting their turn to go through the locks. My friends sold their power boat after only a year of use as they found the recreational traffic too heavy. With these observations in mind, I believe we do not need to encourage more water traffic on the river.

Finally, I must state my philosophy on government. I believe in government at the lowest practical and possible level and state we do not need to add an additional layer of government to the river in our area. I believe we can do any development along the river with local governments. Each time I pass the main United States Post Office downtown I am reminded of the federal government's folly in building that huge building right on the banks of the river where we should have had a park setting. Why wasn't the federal government more concerned about the river away back then? No, leave the federal government out of this river development.

Sincerely,

Rhona Wetherille

October 1, 1993

Superintendent
Mississippi National River & Recreation Area
175 East Fifth Street
Suite 418
Box 41
St. Paul, MN 55101

As a resident of Coon Rapids that lives on the Mississippi River, I am greatly concerned about the draft plan for the River.

Following is an outline of my concerns:

1. Coon Rapids Dam - It is imperative that the dam be repaired and maintained in its present state.

2. Winter water elevations - to minimize the flooding and bank destruction the locks must be lowered to the current level.

3. Federal Government Control - We do not need any additional government control. Keep control at local level.

I encourage the commission to view the many improvements done by the numerous property owners to enhance the beauty and protect the natural river bank. Millions of dollars have been spent to enhance property values and help keep the river as a valuable natural resource.

Sincerely,

Llarrie G. Nettum

Llarrie G. Nettum

LN/co

COMMENTS

To Whom it May Concern

The taxpayer cannot afford to buy out 3 privacy homes, businesses, and homes. Saying nothing about all the jobs lost at these businesses I'm one of the employees that work at Cedarcrest Nursing home. Over 80 some residents home. Over 80 some residents here, and 44 at Camden Care. -here, and

My house is fully paid for. I've done a lot of improvements on my house. I have no intention of selling.

Caridad M. Cabrera
[redacted]

544

October 4, 1993

Superintendent, Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418
Box 41
St. Paul, MN 55101

RE: Anoka area of Mississippi River

I think the river is being controlled just fine at this point. I would not encourage the federal government to get control of it, there is plenty of other lands the National Park Service can control in this state.

My main concern is the Coon Rapids Dam which I feel should be upgraded and controlled by the Corp of Engineers.

We do not need some body of government in Washington telling us what land and usage is needed up river from the Coon Rapids Dam. We have a lot of wild life and good fishing in this part of the river.

Larry Baden
[redacted]

LB/akt

Oct. 7, 1993

Supt. Mississippi Natl River + Recreation Area
175 E 7fth St. Suite 148
Box 41
St. Paul, Mn. 55101

The draft plan for the Natl River & Recreation Area leaves several questions unanswered that are important to all the homeowners, businesses and entities along the river. These questions must be fully addressed and settled before any final plan be implemented.

Control of the river must remain with the local officials.

Acquisition of land along the river must be negotiated and compensated to the satisfaction of the owners.

Approval of local permits must rest with local officials.

Another layer of management for the river is the last thing we need.

Lee R Conner

LEE R. CONNER
[redacted]



Joel & Frances Torstenson
[redacted]

Superintendent
MNRRA
175 - East 5th Street Suite 418, Box 41
St Paul, Mn. 55101

Dear Madam/Sir:

As a Professor Emeritus in Sociology & Metro-Urban Studies at Augsburg College — and now a resident near the Mississippi River — I have been keenly interested in the MNRRA development prospects. It seems to me that such a development can become a model for similar developments in other parts of country.

I have read the July 16, 1993 Public Testimony of the Citizens for a Better Environment concerning the Comprehensive Management Plan and Environmental Impact Statement, and am familiar with the three alternative plans alluded to in that document.

I strongly favor developments indicated in alternative "B". We cannot afford to pass up this strategic moment for developing an environmentally sound plan that fully recognizes the Mississippi River as a great national if not global treasure.

Thanks for your leadership.

Respectfully yours
Joel S. Torstenson

10/06/93

To:

Superintendent, Miss. National River and Recreation Area

Commissioners,

As a landowner along the Mississippi I am greatly concerned about recent proposals that deem to acquire land against the owner's wishes. I believe that there now exists enough public lands that are in need of development for public uses without the additional expense of acquiring more property.

To hold a virtual sword of Damacles over land owner's heads that their property could be taken away against their will and at a price that might not reflect the true value as it exists now will destroy the value of their homes and property in the future. If this process is carried through, landowners along the river will lose the value of their investments, the government will lose needed monetary resources to develop land already public, and more land along the river will be neglected to the detriment of the public good.

As I see it there is no reason for federal intervention in local control of the Mississippi Corridor other than the waste of tax dollars and the erosion of local real estate values.

Sincerely,

Thomas Robert Ericksen

Thomas Robert Ericksen

[redacted]

ISLAND STATION

[redacted]
292-9420

Nicollet Restoration, Inc.

[redacted]

October 5, 1993

Superintendent, Mississippi National River & Recreation Area
175 East Fifth Street
Suite 415
Box 41
St. Paul, MN 55101

We recently received a letter referring to the draft plan from the National Park Service with respect to the Upper Mississippi River. We own the land known as Island Station at mile 841 and would appreciate a copy of this draft plan. We have not received one previously.

Since there is probably not time for us to receive this draft plan and submit comments, we would like to merely state that we believe the Mississippi is a multiple use resource. We believe there is plenty of room on the Mississippi for diverse uses. We believe that a large amount of publicly owned wilderness and public usage land is good for the river. We likewise believe that other uses, perhaps in smaller stretches of river, are appropriate. These uses should include industrial, private housing, etc. We especially think that uses that provide access from the land to the river and from the river to the land should be encouraged. Before attempts to regulate the amount of boat usage, the conduct of boaters should be regulated by licensing, as was done with motor vehicles in about 1910.

Sincerely yours,

John J. Kerwin

JJK:mf

Dan McGuiness
[redacted]

October 7, 1993

JoAnn M. Kyral
Superintendent
MNRRA
175 East Fifth Street
Suite 418
Saint Paul, MN 55101

Re: Draft Comprehensive Management Plan
Review Comments

In response to your letter of June 30, 1993 and the notice of the extended time for review of the draft Comprehensive Management Plan for the Mississippi National River and Recreation Area, I am providing the following comments as a resident of Saint Paul and a private property owner of residential property within the legal boundaries of the MNRRA area.

1. General Comments About the Report Development Process

Against incredible odds and with every assurance that you would not be able to satisfy most of the people most of the time, the National Park Service staff and the Mississippi River Coordinating Commission has reached this critical stage of releasing a draft report for public scrutiny and review. As a landowner in the area with a direct interest in this process and its outcome, I extend my thanks to the staff and Commissioners who have worked long hours toward this end. I think you have done a commendable job of sorting through a reasonable set of options and recommending one that is consistent with the founding legislation.

2. General Comments about the Report

The report is well organized yet concise. It presents a wealth of information and a discussion of alternatives that enables the average reader to compare alternatives and impacts. Given the complexity of the political puzzle and the diversity of interests, you have provided about the right amount of information.

3. Specific Comments Regarding Bluffland Protection

(a) Of all the issues addressed on pages 3-10, the three (related) issues I belive are most in need of acknowledgement and a defined course of action are the following (listed on pages 4 and 5):

> The corridor includes many outstanding vistas, areas of scenic beauty, and tranquil places in the midst of a great urban area. These scenic and aesthetic resources can be adversely affected by uncontrolled development, incompatible design, high speed roads and poor land use practices. (page 4)
>
> Unrestricted development on the slopes or near the edge of the bluffs causes soil erosion and diminishes the quality of the view from the river or opposing overlooks. Residences are built often near the bluff-line to take advantage of river views.
>
> Indigenous vegetation along the shoreline, in wetlands and along the bluffs is important to the visual character of the corridor and support of natural systems. Unrestricted development can strip vegetation if established regulations and guidelines are not followed.

The Mississippi River in the Twin Cities is more than the water and the riparian shoreline, it is a greenway of ecological, economic, scenic, historical and recreational importance. The MNRRA plan recognizes this fact and the recommended plan takes this into consideration.

(b) The sample design guidelines in Appendix C should be promoted by federal and state agencies, adopted and enforced as regulations by local units of government (with technical assistance from the National Park Service, Metropolitan Council and the DNR) and MNRRA landowners should be advised of the guidelines through some form of MNRRA landowners guide, available to current landowners and provided to new purchasers via some mechanism such as lending institutions and realtors, or, perhaps, mailed to them with their real estate tax statement.

(c) To assist MNRRA in implementation of its plan, MNRRA agencies should explore cooperative efforts with one or more local nonprofit land trusts who can help serve as partners in protection of critical resources in the corridor.

(d) The land use and protection policies expressed on pages 20 - 29 address an array of threats to the MNRRA corridor and they should become a part of the final plan and integrated into its implementation strategies.

4. Specific Comments Regarding Open Space and Trails

Second only to bluffland natural and scenic protection, the coordinated planning for, and creation of, a corridor trails and open space system, can be of immense economic, recreational and environmental benefits to the Twin Cities natural and cultural resource base. A high priority focus should be given to creating the trail system envisioned in this plan. Having access to this resource will engender awareness of its beauty and importance. That awareness, in turn, will enhance people's understanding of the need for protection, which will, in turn, engender for resource protection a desire for action. Secondary benefits will accrue back to the resource from those who enjoy it. The National Park Service can play a valuable role as technical advisor, coordinator, and possibly a conduit of funds for this vision to become reality.

5. Commercial Navigation and River-Dependent Industry and Trade

This Plan has been met with expressions of great concern by those who believe that, for the future, its adoption will infringe upon their ability to make a livlyhood from the river and its resources. The right to ply the river for business and pleasure is in no way diminished by the proposed plan. If anything, it is, once again, acknowledged as an important part of the river's culture and as an important part of our urban and agricultural economy. People should examine carefully the arguments of those who would run this plan aground with exaggerated fears of economic adversity. I don't think commercial navigation or existing industrial uses of the river will be hampered by the adoption of this plan. If anything, all current uses can only be further acknowledged and accepted as they become part of the accepted vision for the future.

6. Conclusion

The Mississippi, Minnesota and St. Croix Rivers are tremendous assets to the Twin Cities Metropolitan Area. They may, at times, impede our ability to move about in the region, but what they give us in return are far in excess of any problems they cause. This plan brings the Mississippi River into the ranks of rivers in this state acknowledged for their remarkable role in our cultural and natural history and in our present quality of life. We now have three rivers in the metro area that are acknowledged by the U.S. Congress to hold special qualities worthy of our care and stewardship. Instead of raising our political armor in battle against a small increment of federal presence, we should be welcoming this effort as yet another source of support as we give due to this nationally-renowned river.

Sincerely,

Dan McGuiness
MNRRA Landowner

October 4, 1993

Wayne and Sandra Hanson
[redacted]

Superintendent
Mississippi National River & Recreation Area
175 East 5th Street Suite 418 Box 41
St. Paul, MN 55101

Dear Sir or Madam:

My wife and I are writing to you to express our concerns regarding the development of the plan for management of the Mississippi National River and Recreation Area (MNRRA) which directly affects our homestead located at 7162 Riverview Terrace, Fridley, MN 55432.

We have three major concerns regarding any proposed plan. First, while everyone agrees that preservation of the river corridor is essential, there is considerable controversy concerning both the process and specific elements of preservation. We choose to live near the riverbank because we greatly value the privacy which is afforded us in our current location. However, we fear that this tranquil atmosphere may change. We do not wish to suffer as other residents in the metropolitan area have suffered when their homes become incorporated into the functional equivalent of municipal parks by virtue of the establishment of bicycle trails, the running of marathons, and the utilization of river corridor property for every public event involving noise, disorder and large crowds.

Second, we are extremely concerned with the notion that the plan now being considered would add a "veto" authority to the Department of Natural Resources and the National Park Service. We believe that land use regulation is a local issue and that current local controls are working very well. It appears to us that added bureaucracy transforms simple actions such as home improvement into a legal nightmare. There is ample precedent in other areas where land owners have done battle with the National Park Service concerning interpretation of local ordinances which substantially diminishes the value, use, and enjoyment of private property. In addition, analogous if not identical problems can be seen in so called historical preservation districts where well-intended plans have seriously impaired the use, enjoyment and value of private property. We do not want these problems in our area.

Finally, we are concerned with the lack of specifics in the proposed plan. The plan, which is at best an ambiguous document, is designed so that any criticism would appear to be unfounded and speculative thus paving the way for adoption of a rather general document which will allow further onerous restrictions through the use of administrative fiat. We do not believe that this is good public policy, and we are gravely concerned for the value and enjoyment of our property.

We appreciate the opportunity to comment and if you have any questions please do not hesitate to contact us.

Sincerely,

Wayne and Sandra Hanson

Wayne M Hanson
Sandra K Hanson

October 7, 1993

Mississippi National River and Recreation Area
175 East Fifth Street, Suite 418
Box 41
St. Paul, MN 418

Re: ***Mississippi River Commission - Coon Rapids Dam***

Dear Superintendent:

I have received and read information being published and distributed in regards to the Mississippi River Commission - National Park Service. The following response reflects some of my concerns on this issue.

The information I have read appears to indicate that the Commission chooses to disregard addressing the issue of the future of the **Coon Rapids Dam located on the Mississippi River**. If the repair and future of the dam continues to be avoided in your planning, then your planning and responsibilities to the river and the communities effected by the river have not been completed or handled professionally or appropriately.

The dam effects many people not the least of which are the landowners living adjacent to the river above the pool created by the Coon Rapids dam. Many of these people have lived in those locations for a long time. They have been responsible citizens and taxpayers. A large percentage of these homeowners have invested extensive dollars into their land for maintenance of the river bank. If these issues are not given any consideration, I am sure these individuals will be affected by this issue without any plan to handle this dilemma. **I makes no sense to knowingly set-up an incomplete plan potentially creating greater problems in the long run.**

I spoke, over the phone, to a member of the Park Board in regard to this plan during the initial stages and was given the understanding that as the plan developed it would reference such needs. Therefore, I did not attend the meeting and take up time in the beginning stages being this was to be dealt with in the later stages.

When is this issue going to be an agenda item and part of the plan so a resolution can be identified?

I have lived in Coon Rapids for 30 years. I have dealt with other issues in the past regarding the community and also specifically regarding the river. I am of the understanding that Hennepin County accepted the responsibility and the control of the dam obligating them to also be financially responsible for its maintenance and repair. Now when these issues do not fit their budget they seem to drag their feet. Similarly, when others inquire as to what is going on, they then expect Anoka County and others to assist with financial contributions. This has seemingly resulted in everyone sitting on their hands afraid to deal with the issue so it is just stuffed under the rug. **The longer this issue of the needs of the Coon Rapids Dam on the Mississippi River is handled in a pass the buck and ignoring the issue fashion by Hennepin County and not addressed at your commission, the harder it will be to get the community cooperation and the best resolution to these issues.**

If in fact this continues to be overlooked, I will personally begin to research options to have this issue considered and to obtain appropriate action instead of this on-going game that is being played by the main responsible governmental bodies involved.

I am extremely disappointed with the members that are responsible to address this part of the plan and problem of the Coon Rapids Dam on the Mississippi River. I will be copying this letter to many in the neighborhood and prominent officials as well. The reason I addressed this issue with very few specifics is to focus on this being a serious agenda item for the commission first and then with all the details addressed in the proper setting. **I will also be glad to develop a further knowledge and reference base on this problem, for myself and others in the area, and request you as a commission do the same.**

Thank you the opportunity to submit this response.

Sincerely,

Ruth A. Frandle

Ruth A. Frandle

[redacted]

Dear National Park Service,

Everything I have read in the St. Paul paper about the Mississippi river corridor plan I like so far. it sounds like every body did a good job. I would like to say I agree that the Mississippi is a working river and jobs need to be kept and if possible enhanced, but I do not agree that that should be done at all costs.

Please stress the Environment and responsible industry and jobs.

Thank you
Ronald R. Funes
[redacted]

P.S please send me more information on the draft plan for the Mississippi National River and Recreation area.

Superintendent, Miss. Natl. River & Rec. Area
175 East Fifth St. Suite 418
Box 41
St. Paul, Mn. 55101

We are writing regarding the proposed plan concerning the Mississippi River Corridor. We have attended several of the public hearings and heard upon what staff told us we should have no major concern relative to any changes to our property. We reside on the Mississippi River in Prescott.

We are concerned that in spite of what we have been told verbally, that the plan provides for the potential of creating significant future problems. We purchased the property and paid a substantial amount of money for the right to live on the river. The original planning, as we understood, was to allow local government to determine what is reasonable for development and maintenance of the property. Now we are being told that the potential exists for people that have no personal interest in our property, to tell us how we are to maintain it. It is our intent to keep our property as valuable as possible. We are not suggesting that we would not maintain our property, however we are concerned that some federal bureaucrats would restrict us from keeping the property in the same condition in which we purchased it or were yet attempt to run a trail or road across our land destroying the value of the land and creating a significant safety, security and tax.

We have no problem with cleaning up the river or controlling future development, but we should not have to personally sacrifice our investment so that a few politicians can get reelected. Persons using the river would not be offended by the condition of our riverfront property and it is maintained so as to prevent erosion and runoff. We regularly clean the banks of the countless trash which is known in the river system (bottles, cans, building materials, etc.) None of us that live on the river have a moral desire to be in keeping the river and shoreline in good shape than do bureaucrats and politicians with no personal stake to the river.

In conclusion while we fantastically support the concept of cleaning up the river and controlling future development, we have grave concerns about the draft plan as it exists. The good intentions of earnest staff and involved persons will mean nothing if the plan is poor.

David H. & Wendy K. Sallmen

[redacted]

Superintendent 10/9/93
Mississippi National River and Recreation Area
175 East 5th. St. Suite 418
Box 41
St.Paul, Mn. 55101

Gentlemen,

In reference to the MRCC I am concerned about the following:

What influence will I have as a property owner on restrictions and requirements in the future.

In the event your group or some form of government wants to aquire my property will I have the right to negotiate the price and can I have a disinterested third party valuation.

Will the officials of the city of Fridley have a voice in the future decisions and how much power will they have.

As the states should direct the federal government will the state of Minnesota have the final say of what is decided regarding this subject.

How much notice will property owners have on future decisions.

Will we have the right to sell our property to another party after we have been advised of any future decisions regarding this subject.

Thank you for your considerations, please keep me advised.

Clelland E. Martinson

[redacted]

Dear Sirs:

My family and I live on the East side of the Mississippi River in Fridley Minn. and have about 92' of river frontage.

We are most concerned about the possibility of development of land along the river which we understand might include a bike path. We have no problems allowing the land to remain in a natural state along the river and have taken no steps to make it otherwise. Our concern involves invasion of our privacy and the litter which is usually seen in public areas.

We only ask that our property is not turned into public depository for paper and garbage. The thought of having a path going through our front yard wide open to view through our front windows is not pleasant nor would it be for anyone including those members of this Commission.

Very truly yours,

L. O. Loge 10/9/93

L. Loge

[redacted]

Oct. 10, 1993

Mississippi River Corridnading
Commission and National Park Servies

Dear Sirs:

After examining the condenced version of the "Comprehensive Management Plan Inverinmental Impact Statement" I am very concerned in regards to the property I own. Particularly pertaining to where the boundries of the corridor are layed out at this presant time. I know these boundries can change at any given time as this peroposal moves thru its proceedings. My concern is wether these changes will result in a negitive or positive effect partaining to my property. There are not enough specifics spelled out at this time. With the presant information I would be in favor of alternate "A" plan until further extinsive information is provided to business and property owners.

Sincerely,

Isabelle K Broz

Isabelle K. Broz

[redacted]

554

Mr. Gregory E. Madsen

[redacted]

October 8, 1993

Ms. Joann M. Kyral, Superintendent
MISSISSIPPI NATIONAL RIVER & RECREATION AREA
175 E. 5th Street #418
P. O. Box 41
St. Paul, MN 55101

RE: MINNESOTANS FOR THE MISSISSIPPI

Dear Joann:

I have read the draft of the Comprehensive Management Plan/Environmental Impact Statement for the Mississippi National River and Recreation Area of which your offices provided me.

My concerns are numerous, however, the issues which stand out in my mind most blatantly are the inherent problems that exist with a linear open space at the river's edge. Trash left behind from visitors, noise, graffiti carved in trees and benches, vagrants, accelerated erosion of the river bank and general maintenance problems or neglect.

Joann, these are real issues. Simply glance at the parks that currently exist and you will witness all of the aforementioned issues.

I am now, as per your proposal, facing the possibility of experiencing these issues on a daily basis, literally in my own backyard. From a more physical standpoint, I can't fathom how this project could be economically feasible. As an architect, I understand the process required to transform the existing riverbank, fauna, and wildlife areas into usable park or trail areas. It is unconscionable to think that the removal of so many trees, the addition of retaining walls, and general regrading of the river bank will be a positive measure.

I am confident that if your proposal comes into fruition my property value, along with all of my neighbors' property values, will decrease significantly.

I look forward to the next meeting regarding this proposal.

Contact me at 336-1255 with any questions that you may have.

Sincerely,

Gregory E. Madsen...

Gregory E. Madsen
Architect

c: Larry Hunter

c:\bds\kyral.gem

[redacted]
(My Address)

Superintendent
MNRRA
175 E. 5th ST., Suite 418, Box 41
ST. Paul, MN. 55101

Dear Superintendent.....

My name is Katie Bogren and I go to Dowling school. Iam in the 5th grade. My school is next to the Mississippi River. I see the River almost every day and every day I see trees, water, and TRASH where it dosn't belong. People keep on polluting the River thinking it's a big trash can. I think that we should have more trash cans and less garbage in the River. I also think that there should be a dam to hold some of the sewege. That way the sewege dosen't get in the water as much. I am not only asking you to do this for pretty scenery but for the animals as well.

Thanks Katie Bogren
Katie Bogren

[redacted]
9-23-93

Superintendent
MNRRA
175 E. 5th St., Suite 418, BOX 41
St. Paul MN 55101

Dear Superintendent:

Hi my name is Jonathan Gardner. I'm sutdent a Dowling Urban Enviormental Learning Center. I am writing about the three differnt Mississippi plans A,B,and C.

I think that plan A doesn't do anything so what use is it? Plan C ends up giving money to the goverment then we end up in debt. Plan B cleans the water and helps the animals.

I go with plan B, Thank you.

Sincerely
Jonathan
Gardner

[redacted]

MINNEAPOLIS MN.
Sept.23, 1993
55406

SUPERINTENDENT
175 E 5TH ST. SUITE 418,BOX 41
ST.PAUL MN. 55101

Dear Superintendent,

I think the river should stay clean. No-one should cut down anything. The water should stay clean , and there should be a fine for people who pollute. The fine should start low and get higher each time. I think there should be patrols about the river (one every two blocks). They should watch for polluters and people like that.

I also think people who are causing troiuble such as yelling (disturbing people), bothering little kids, and disturbing things like that should be kicked off the River parkway.

People shouldn't have to be afraid to go down to the river because of these problems or not want to go because of pollution.

Another problem along the river is cutting down trees by the river. People shouldn't be able to cut down trees. It creates lots of problems ncluding destroying animal homes, trees, and alot of others.

Please do something.

Sincerly,
Joey Hogeboom
Joey Hogeboom

[redacted] Sept 23, 1993

Superintendent
MNRRA
175 E. 5th ST., Suite 418, Box 41
ST. Paul, MN 55101

Dear Superintendent:

Hi ,my name is Ray Colton. I am a fifth grade student at Dowling Urban Environmental School. I'm writing this letter about the Mississippi River.

I think we need to clean up the river not only so it looks good, but so all the fish don't die and so we don't have to spend so much money to clean the water we drink.

[redacted] 9/23/93

superintendent
MNRRA
175 E. 5TH ST., SUITE 418, BOX
41 ST. PAUL ,MN 55101

Dear, Superintndent

I'm Aaron keehn. I'm writing to you about the plan to clean up the river.

I would like for your plan to help the wildlife on the river, and make it safe for swimming and catching fish (eating them too).

sincerely
aaron keehn aaron Keehn

[redacted]

Oct. 5th 1993

Superintendent,
MNRRA
175 E. 5th St.
Suite 418
St. Paul MN 55101

Dear Superintendent,

I think we should stop the poullition everywhere. I'm at Dowling school. I'm just here to say how the animals need fresh, not dirty, water. It isn't fair for the animals to have a bad habitat.

Thank You,

Tiffany Priest

[redacted]
OCT 5. 1993

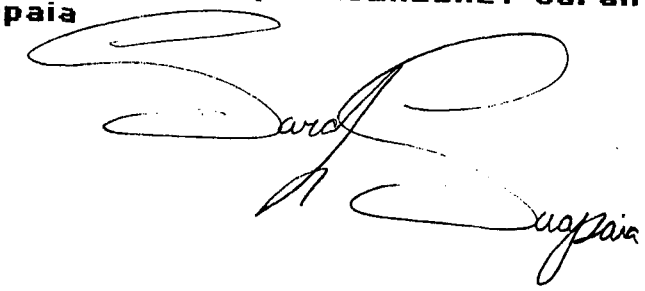
Superintendent
MNRRA
175 E. 5TH ST .
Suite 41
St.Paul MN 55101

Dear Superintendent,
I am a student at
dowling school. I am writeing to you
[redacted] good and bad
about how you plan is good and bad.
I'll start with the bad. I think that
the animals should have a right to
live in a clean enviermentjust like us.

We all have a job to do;the kids' job
is to work with the enviornment.
Minnesota's job is to clean the
eniverment. Birds , snakes all kinds
of animals need homes and habitats.

The animals need a enviornment just
as much as we do.

THANK YOU, SINCERLERLY Sarah
Suapaia



Dear Superintendent
think that you should teach us
about saving the Mississippi River.
I hope they clean up the pollution
because it is killing the fish and it
might affect people.The people
should stop pollution the river.They
should help clean every thing up

Quentin



Dear Superintendent,

My name is Andy Johnson. I am writing to you about the plan to clean up the Mississippi river.

I choose plan B. Because it favors the environment. We need to think about the animals and people who use the Mississippi River. The Mississippi is the source of drinking water for millions of people from Minnesota to the Gulf of Mexico.

Thank you.

ANDY
JOHNSON

[redacted]

Superintendent
MNRRA
175 E. 5th St.,
Suite 418, Box
41 St. Paul, MN
55101

Sept, 23, 1993

Dear Superintendent .....
I'm in 5th grade at Dowling school and my name is Ryan O'Hara.

I think people should help clean up the river. They should stop pollutinng the water so it does not cost as much to clean it.

I would like the river to be clean.

Sincerely,

Ruan O'Hara

[redacted]

ave. south
Sept - 2 1993
Superintendent
MNRRA 175e 5th st.
suite 418 box 40

Dear Superintendent:



My name is Derrick Brust. I am writing about the river.

I think I we should keep the Mississippi cleaner. One time I was fishing and I caught a fish and its fin was blue and green.

you cant do this by your self. We have to work together to do this.

Sincerely
Derrick Brust

[redacted]

Superintendent
MNARA 175 E.
5th St.,Suite 418,
Box 41 St. Paul
Mn. 55101

Oct. 5,1993

Dear Superintendent
I am Audrey Redhead.
I'm from Dowling School. I'm writing about what to do with the polluted river. I don't think we should do nothing about it. I think we should clean it so animals and fish will be happy there and live there longer. People will be happier to see it without thinking it's just another stinky,smelly, river. I think we should clean the river



so every animal will have a better life. If we choose for people to clear out the river & build actories, the animals will have no homes.





I wish for you to make the river cleaner.

Thank you.
Audrey Redhead Sincerely,
udrey Redhead

[redacted]
SUPERINTENDENT Minn, MN 55407
OUT,5 MNRRA 175,ST, Box 41
ST.PAUL MN 55101

DEAR

SUPERINTENDENT



I am Latasha Ann Jones and I am a 5th grader. I am in room 109.

I care about fish. Can you take care of the fish PLEASE? I like fish. I care about the river because I like drinking water.



Thank you so much for caring about the river.

Latasha Jones

THE END

[redacted]
9/23/93

Dear Superintendent:

My name is Blake davis.

I am writing about the Mississippi iver.

I think that the river will be polloute because of trash. Can you help us

Sincerely
Blake Davis

[redacted]

Dear Superintendent:

Hi my name is Stephanie Svidron. I go to Bowling School in Minneapolis. I'm in 5th grade. I like nature.

I think we should be able to drink the water. It should be cleaner because it goes from Minnesota to the Gulf of Mexico. The river is the longest river I have ever heard of in my life time. Drinking water needs to be cleaner.

The animals should have a place that they can go and live safely. Some of the insects and animals have died from the pollution. Inside of the boundaries should be for the animals and nature.

I thank you for letting me write this letter.

Sincerly,

Stephanie Svidron

10-10-93
Mike Nagel
[redacted]

U.S. Dept. of Interior, N.P.S.
MNRRA
175 E. 5th St., Suite 418, Box 41
St. Paul, Minn. 55101

SUBJECT: MNRRA Plan

DEAR CHAIR:

As a citizen of Anoka and a riverfront property owner, I am writing to voice my concern about the potential negative impact of this plan on affected homeowners. This plan is vague regarding the future control of the affected property. Is local government retaining control or losing control to the Federal Government? What input will local property owners have when their property is valued?

I oppose Federal mandates which impose on localities, leaving little recourse to the citizenry but to write letters of opposition.

This whole plan has progressed for with little publicity and a seeming avoidance of "letting the public know." I attended a Ramsey meeting in which the only representation against this plan was from corporate leaders afraid of losing their businesses and with little or no representation from local citizens; "Perhaps they were unaware of how this might affect them," or unaware completely of the plan.

Bureaucrats with personal agendas are too populous to count these days and perhaps this plan will slip into being due to the stealth which its shepherds have exercised.

If this plan progresses, I request that it needs to formulate a fair and equitable balance in the needs of and rights of affected homeowners, businesses, and local government. Lacking this balance, I would oppose this plan as another ill conceived bureaucratic agenda which aggrandizes its authors.

I am all for parklands, and recreational areas to commune with Nature and am an ardent fan of those who have taken stands on preserving such spaces. However, the likes of John McPhee or Edward Abbey whose writings made millions of Americans aware of our national beauties couldn't have conceived such a park as this plan does, and thus it must be carefully done, if at all, to be fair to all.

Sincerely

Michael J Nagel
[redacted]

National Park Service
175 East 5th Street
Suite 418, Box 41
St. Paul, MN. 55101-2901

Dear Mississippi River Coordinating Commission;

I am excited to learn that efforts are being made to protect and preserve the Mississippi River through the National Mississippi River and Recreation Area (MNRRA). I am also encouraged that the river will be a designated area for the enhancement of recreation and the protection of wildlife.

I think that in order to make the management plan a success it is important to ensure water quality in the river and protect the health of ecosystems. Specifically, the issue of toxics in the river must be addressed. Protection and restoration of wetlands also must be a key provision in MNRRA management plan.

I support plans to create a trail and greenbelt system along the entire river corridor. I believe that linking the trail to existing neighborhood parks and trails will greatly increase public access. It is important to insure access for the diversity of neighborhoods and communities who enjoy the river.

It is also important to encourage non-motorized recreation on the river by adding no-wake zones and horsepower limits.

Please incorporate these elements in the MNRRA plan. Thank you for your efforts in protecting the river.

Thank you,

Concerned Citizen

[redacted]

566

D

October 10, 1993

Superintendent, Mississippi National River & Recreation Area
175 East Fifth St., Suite 418
P.O. Box 41
St. Paul, MN 55101

RE: Draft Comprehensive Management/Environmental Impact Statement

We attended the July 28, 1993 public hearing at Inver Hills Community College and have reviewed the captioned document. We have the following opinions to offer for consideration.

We support the "Proposed Plan" except in the following issue areas:

Barge Fleeting Areas. We perceive the proposed "monitor effects" approach to be an "after the fact" approach which can create uncertainty for both commercial and environmental interests. In our opinion, the approach suggested in Alternative B would lend itself to creating more certainty for determining future barge fleeting areas.

Resource Management. We believe that resource protection, pollution reduction and research efforts should be stressed (as proposed in Alternative B) while protecting cultural and economic resources.

Land Use Management/Local Monitoring Option. With respect to this issue we believe a NPS/Local partnership with the DNR and Metropolitan Council providing input and supplementary research support is an appropriate alternative. However, we don't believe having the Metropolitan Council and the DNR review and approve local plans and actions will improve the decision-making process. Further, we believe the bordering county governments should have representation in the management partnership.

Thank you for the opportunity to convey our views and for extending the public comment period.

Sincerely,

Terry & Joanie Davis

October 10, 1993

Re: Draft Comprehensive Management Plan, MNRRA

From: Pat Davies, Environmental Quality Board designee and alternate to MNRRA Commission

VISION

Putting in place protections and changes for the Mississippi that conflict with current practices is difficult because those who will benefit from changes are not as well organized and as aware as those who directly benefit from the status quo.

When the National Park Service planning staff, based in Denver, began revising its draft to try to accomodate reservations expressed by the more than fifty local government jurisdictions dealing with the river, it had no idea of the tenaciousness of the "local control" and "another level of government" mantra in Minnesota. Tailoring the plan to local governments' expressed concerns has not resulted in support but rather the opposite. It has defeated the vision of the legislation.

The idea of the river as ONE irreplacable resource to be protected and enhanced for future generations, apparent in the law, is completely missing in the plan. It needs to be there. The public - canoers, birdwatchers, those who want to view and be inspired by the river and the activities on it, anglers, hikers, history buffs, those who understand the need for wetlands and natural habitat, bicyclists, those who want to protect fish and wildlife resources - do not see the Mississippi as a series of little jurisdictional areas and neither should MNRRA.

ACCEPTANCE OF STATUS QUO

The draft plan is too accepting of anything and everything "existing." Much existing development is inconsistent with plan values and the plan ought to encourage change wherever necessary. Grants may be one method of facilitating change that would be acceptable and readily understood. The draft underestimates the power of good ideas.

On Page 18, drop the last sentence: "Existing development should not be substantially changed by this plan." On Page 23, drop the last sentence: "The plan would also allow businesses and industries in the corridor to expand existing facilities if the expansion is consistent with resource protection and site development policies." Why should expanding current facilities be under less stringent requirements than new businesses and industries?

On Page 20, the draft needs to mention the Environmental Quality Board and the Critical Area program after the sentence: "Local governments would continue to have primary land use planning and control responsibilities." Because the EQB is charged with monitoring compliance with this program but has not done so, some localities may be surprised to find out that in regard to riverfront decisions, they have been bound by Critical Areas provisions since 1976.

Also, on Page 20, the last sentence of the second paragraph reads: "Development would be compatible with surrounding land use and conform to established community zoning regulations and design guidelines." Because this sentence only perpetuates current conditions, it needs to be eliminated. In its place, insert: "Community zoning regulations and design guidelines for areas within MNRRA boundaries should conform to this plan."

CONTINUOUS TRAIL

In every place in the draft that is appropriate, the concept of a continuous trail should be inserted. It is essential, for example, in Location Policies, page 24. Industrial uses, recreational uses, public facilities - all new uses - should be planned to foster the continuous trail system.

In addition, the new uses listed in the draft on Page 24 include housing and office buildings within the 300 foot corridor. Office buildings do not require a river location and should not be built there.

New housing also should not have a direct river location if there is any vision of regaining the corridor for the public. The farsightedness of Minneapolis in providing public trails around all its lakes, with private homes being set back, shows the long term advantage to both the public and to the homeowner of this policy. The most highly valued homesites in Minneapolis abut the public trails around the lakes.

Page 30 deals with Open Space and Trails but contains no positive emphasis on what the draft admits is "an important vision of this plan", a continuous trail along the corridor. The second paragraph on this page should be eliminated; it advances nothing. The third paragraph is not true, if it applies to the river, and if it doesn't, it is irrelevant. The fourth paragraph should be rewritten in a positive manner and if the MNRRA plan is for the future, the northern stretch should not be excepted.

Page 34, (6), should read: "Ensure paths" instead of "Ensure access" across all new and rebuilt bridges.

LEVEES

On Page 24, the exclusion for land behind levees should be eliminated. The most cogent reason for this elimination is in the comments by the Minneapolis Park Board. ". . . recreation, preservation and economic development . . . are not mutually

exclusive. Preserving and developing the River has, in fact, been a significant economic development tool in Minneapolis." The draft ought not exempt the land behind levees just because two communities along the corridor protest because they do not have the vision to see how enhancing the river for public use can make the land behind that public portion more attractive, even when used for industry.

PLANNING

In Location Policies, the draft says in (7) on Page 26: "Encourage high quality and sustainable open space, public plazas, historic landscapes, interpretive facilities, and residential, commercial, and industrial development in the corridor subject to location policies and local land use plan objectives." If MNRRA is to have any effect, this sentence has to read: ". . . local land use and MNRRA plan objectives."

PUBLIC ACCESS

On Page 29 (16), the vision of the MNRRA commission for improved public access is lost. It asks only that current access be "maintained" and more access be allowed in redevelopment and new projects "if practical." The concept of increased public access and use of the river needs to permeate the draft more than it does. In (16), "if practical" should be eliminated.

HISTORIC USE

On Page 42, (1), the draft proposes a policy under Cultural Resources Management to "continue the historic use of historic properties." This can be misread to protect current industrial uses in conflict with good environmental policy and economic reality. An example is the University steam plant. Eliminate the first sentence and leave the second: "Develop incentives to retain historic uses where feasible and in compliance with environmental laws and regulations."

PERSONAL COMMENT

I have served as the EQB designee and alternate to MNRRA for over three years with a 92% attendance record at MNRRA meetings in all parts of the corridor, MNRRA committee meetings, community meetings and hearings on MNRRA, seminars and public discussions on the Mississippi, legislative and congressional meetings on river issues. I have authored pertinent memos to drafting staff throughout the process. I have done this on a volunteer basis with no per diems or expense coverage and my only intent has been to serve the public interest. I have enjoyed every minute of my participation because it is a worthwhile endeavor. I have learned how significant a resource the urban Mississippi is and how hard it is to sustain a commitment to "preserve, protect and enhance the metropolitan river for the people of the United States" - as we are charged to do in the national legislation.

We face special interests that have money and power and would prefer to do the opposite.

I have read all the written comments on the plan and I have listened to most of the oral comments on the plan. The two that should have the most impact on the drafting staff, on the National Park Service and on Secretary Babbitt are the written responses from Rod Sando, Commissioner, Department of Natural Resources, and from the Minneapolis Park and Recreation Board. These two agencies have, over the years, cared more about and done more for the urban Mississippi and its resources than anyone else including all the other commentators combined. Please give the DNR and the Park Board responses the attention they deserve.

Pat Davies

[redacted]

National Park Service
175 East 5th Street
Suite 418, Box 41
St. Paul, MN. 55101-2901

Dear Mississippi River Coordinating Commission;

I am excited to learn that efforts are being made to protect and preserve the Mississippi River through the National Mississippi River and Recreation Area (MNRRA). I am also encouraged that the river will be a designated area for the enhancement of recreation and the protection of wildlife.

I think that in order to make the management plan a success it is important to ensure water quality in the river and protect the health of ecosystems. Specifically, the issue of toxics in the river must be addressed. Protection and restoration of wetlands also must be a key provision in MNRRA management plan.

I support plans to create a trail and greenbelt system along the entire river corridor. I believe that linking the trail to existing neighborhood parks and trails will greatly increase public access. It is important to insure access for the diversity of neighborhoods and communities who enjoy the river.

It is also important to encourage non-motorized recreation on the river by adding no-wake zones and horsepower limits.

Please incorporate these elements in the MNRRA plan. Thank you for your efforts in protecting the river.

Thank you,,
Dick & Carol Hart
Concerned Citizen

October 27, 1993

Ms. JoAnn M. Kyral, Superintendent
Mississippi National River and Recreation Area
US National Park Service
175 East Fifth Street, Suite 418, Box 41
St. Paul, MN 55101

Dear Ms. Kyral:

As a concerned citizen I must express my disbelief over the proposed Draft Plan for the Mississippi National River and Recreation Area (MNRRA).

First and foremost, the Mississippi River is the most important commercial waterway in the United States. As evinced this past spring and summer, interruption of the natural "business" of the river has a negative, if not devastating, effect on a great many people. The Mississippi is a "working river" and it needs to continue to be so.

Second, as a private citizen, I greatly enjoy the "recreational" aspect of the river. A big part of the enjoyment and fascination is watching the trains, the barge traffic and the people at work on and near the water.

The proposed Draft Plan needs to be modified in such a way as to prevent any disruption of barge and rail traffic or any other "river business" that needs to be taken care of.

Sincerely,

Kendra Yanta

Kendra Yanta
[redacted]





As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

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