



United States Department of the Interior

NATIONAL PARK SERVICE
Mississippi National River and Recreation Area
111 E. Kellogg Blvd., Ste. 105
St. Paul, Minnesota 55101-1256

IN REPLY REFER TO:

L3033

July 19, 2010

Shanna Sether
Senior City Planner
CPED – Planning/Development Services
250 South 4th Street, Room #300
Minneapolis, MN 55416
RE: Variance Application BZZ 5163 – 3616 Edmund Boulevard

Dear Ms. Sether,

We are writing in regards to Variance Application BZZ 5163 for the construction of a home at 3616 Edmund Boulevard on or within 40ft of steep slopes. This property is located within the Mississippi National River and Recreation Area (MNRRA), a unit of the National Park System, and the Mississippi River Corridor Critical Area (MRCCA). The MNRRA was established by Congress in 1988 to protect and enhance the nationally significant historical, recreational, scenic, cultural, natural, economic, and scientific resources of the river corridor. The MRCCA was established in 1976 under the Critical Area Act (MS 116G), and in accordance with MNRRA's Comprehensive Management Plan (CMP), is the land management tool that is relied upon to protect the nationally significant resources of the corridor and is administered at the local level.

We have many concerns about the proposed development. The property drains directly into a ravine feeding into the river and any addition of impervious surface and/or removal of vegetation would result in negative impacts to it. The property is also situated on a steep slope that studies have shown is susceptible to erosion. The increased runoff and vegetation removal would potentially exacerbate this. The Mississippi River is of state and national significance and must be accorded the proper protection and management.

The property is within the MRCCA and Shoreland zoning overlays and steep slope regulations are put in place to protect against the potential impacts mentioned above. The regulations for this property were in place far before the applicant acquired it and a variance can only be granted if an undue hardship is present because of conditions or circumstances unique to the property. Since the steep slopes and regulations protecting them were present when the applicant purchased the property, the owner should be required to adhere to them and not be allowed to circumvent them. We do not see any reason for approving the variance request.

We urge that in the review of Variance Application BZZ 5163, the City of Minneapolis administers the MRCCA and Shoreland regulations, adheres to the zoning code, and protects the nationally significant resources of the area. Please contact Alan Robbins-Fenger at 651-290-3030, ext. 250 if you have any questions about our comments.

Sincerely,



Paul Labovitz
Superintendent











