

City to River Group

St. Louis, Missouri

For additional information – please contact Rick Bonasch, 314-752-5811

March 16, 2009

Mr. Tom Bradley, Superintendent

Jefferson National Expansion Memorial

Re: Public Comment – General Management Plan

Dear Mr. Bradley:

The City to River Group is a new organization whose mission statement is to advocate for the renewal of connections between the communities of the Central Riverfront and the Mississippi River through completed physical improvements. We envision a region in which St. Louis renews its connections to the Mississippi River through physical development, forging pedestrian connections to our waterfront. The riverfront should be a point of pride throughout the region, and an environment that is visually compelling and physically comfortable and a legitimate point of interest for residents and visitors alike. The General Management Plan for the Jefferson National Expansion Memorial is crucial to a program of renewing the city's connections to the river. The City to River Group and its Technical Work Committee have reviewed the draft General Management Plan and make the following recommendations to the National Park Service for the final version.

### **1. Removal of I-70 Should Be an Option**

The City to River Group finds that the largest obstacle to access between downtown and the Arch grounds is the current configuration of I-70 and Memorial Drive. We urge the NPS to revise the parameters of the design competition in the preferred alternative to allow for removal of I-70 as part of any program to rebuild the road infrastructure at the parks western edge. A majority of members of our Technical Work Group prefer complete merger of the two roads into a new boulevard that would reduce the width of roadway at the western edge while creating space for new pedestrian-friendly development across from the Arch grounds on the new boulevard.

The boulevard envisioned here would be an at-grade thoroughfare designed to create a pedestrian friendly urban streetscape. This boulevard would extend from the Poplar Street Bridge north to Cass Avenue, alleviating pedestrian connection problems beyond the boundary of the Arch grounds. While removal of I-70 may not be immediately feasible, the General Management Plan governs NPS actions for a long term in which changing circumstances may make the removal of the highway highly desirable. It is important when considering this option to take into account that the New I-70 Connection and Bridge will provide a new route between our regional interstates on the Illinois side, rendering the depressed lanes redundant. We understand it is the intention for this short section of interstate to be renamed as a part of I-44,

but urge planners to consider the possibility that the community would be better served by an at-grade boulevard, rather than an interstate traffic conduit in the heart of our city.

## **2. Consider Alternative Parameters for the Major Design Competition**

The City to River Group believes that an incremental process will not only bring about results more quickly, but generate public enthusiasm for the endeavor as it progresses. We feel that the various options that the NPS has already proposed reflect a worthwhile assessment of the parameters for improving the Memorial area. We urge the National Park Service to rethink the major design competition. Visions generated through a major design competition may be incompatible with the character of the Arch grounds, threatening to its National Historic Landmark Status, too costly or unrealistic. The NPS can set an appropriate master vision while still allowing further exploration of alternative ideas for connections and new programming.

The City to River Group finds that the biggest problems facing the Arch grounds are issues of access imposed by infrastructure not wholly under the control of NPS. While a design competition could generate interesting ideas, the issues of access and connectivity are the major problems facing the Arch grounds. These issues could possibly be resolved by breaking the design program into smaller competitions. Because many other public and private entities are needed to implement successful improvements, and the National Park Service has already identified many major access problems, one option would be for the General Management Plan to set the vision for improved connections in a series of smaller areas, such as the western edge (Memorial Drive/I-70), the connection to Laclede's Landing and so forth. These areas could be the subject of smaller design competitions or requests for proposals. A more deliberate and granular approach may be more realistic for the funding and construction of a successful project.

The management zones for the north and south boundaries of the site should be changed from "Streetscape/Riverscape" to "Design Competition" to allow designers to propose better connections between the Chouteau's Landing and Laclede's Landing neighborhoods in the design competition. These are historic areas of St. Louis which deserve to both enhance and be enhanced by better integration with the Arch grounds.

## **3. Widen Focus on Connection Problems**

The City to River Group finds that the emphasis on the connection of the Arch grounds to downtown only at the axis between the Old Courthouse and Arch to be too narrow of a focus. The General Management Plan needs to improve access at all entrance points to the Arch grounds, including at Washington Avenue, Laclede's and Chouteau's Landings, as well as from the riverfront itself, which does not receive adequate attention in any of the three alternatives in the draft GMP. The riverfront could accommodate commercial and cultural activity that attracts pedestrian activity, through moored structures as well as land-based activities.

As mentioned earlier, the management zones for the north and south boundaries of the site should be changed from "Streetscape/Riverscape" to "Design Competition" to allow designers

to propose better connections between the Chouteau's Landing and Laclede's Landing neighborhoods in the design competition. The parking garage at the north end and the maintenance facility at the south end detract from the landscaped grounds and the General Management Plan should allow for their removal or relocation. However, replacement structures should not create barriers to accessing the grounds or block sight lines to the park from Laclede's and Chouteau's Landings. We think that NPS should consider relocating the maintenance facility and some parking off of the Arch grounds and onto adjacent downtown sites, if practical. We feel that many parking needs could be met by working in metered, on-street parking on a re-imagined Memorial Drive, as well as on other street connections to the north and south.

Successful urban spaces tend to incorporate commercial or mixed use zoning, thus we do not think that expansion of park space on the St. Louis side of the river is desirable or necessary. Instead, we feel that the design competition should take into account what a sustainable and successful boundary between private and public spaces would look like. Much of that boundary currently is unsuccessful due to the pedestrian hostile nature of Memorial Drive and the depressed I-70 lanes.

#### **4. Enhance Public Transportation Connections**

We think that existing connections between the Arch grounds and public transit should be enhanced to encourage more use of both resources. We also think that NPS participation in a downtown trolley loop should be explored in the GMP. Trolleys are an integral part of St. Louis history, and have proven very successful at enhancing urban spaces in other modern cities. We feel that the waterfront in St. Louis can serve as a showcase for forward thinking design that will inform and inspire other future projects as St. Louis continues on its path towards being a world class city.

#### **5. Incorporate Site History into Program Expansion**

Program expansion in the GMP should identify ways in which the history of the Memorial site can be better told through its interpretive programming. These could include exhibits which portray the JNEM site's history from the establishment of the village of St. Louis to the clearance of the site in 1940 including but not limited to re-construction of the Old Rock House, the original colonial village, a display of cast iron storefronts and other elements from buildings demolished as part of the clearance. We also believe that retention of the cobblestone levee is a key element in being able to tell the story of our past. Any potential commercial construction along a redesigned Memorial Drive could incorporate architectural elements evocative of the historic St. Louis riverfront, including elements actually salvaged from buildings demolished to build the Memorial.

#### **In Conclusion**

Our statement of recommendations represents the ideas that are of most concern to us, and omits many points in the three alternatives with which we agree. In general, we laud the NPS

for developing three alternatives that acknowledge the connectivity problems that this urban National Park faces. We offer these recommendations to refine that acknowledgment into a transformative design program.

**Signed**

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