

## **My (Andrew Singer) comments on the preliminary draft of the “Saint Paul For All” 2040 Comprehensive Plan’s Transportation Chapter:**

In many respects, this is an excellent plan. I love that, in infrastructure design and decision making, it prioritizes street users by speed, from slowest to fastest— pedestrians, cyclists, transit, cars/trucks. Policies like T-3, T-5, T-7, T-20, T-21, T-22, T-37 are a huge leap forward for the city and I am super grateful they were included. There is a lot of clear language and good ideas in the plan but there is also some vague “word salad” where the intent of the language is difficult to decipher. This, some highway projects mentioned only in the Maps and Appendix section, and some other areas where I find the plan lacking will be my focus.

**Page 52**, lower left paragraph, it says:

*“Since opportunities to remake streets are infrequent due to limited funds and a high volume of needs (the life expectancy of Saint Paul streets is approximately 40 years, and many go 90 years or more before being reconstructed), the chapter establishes clear priorities for project selection. Projects will prioritize safety and equity benefits, followed by support for quality jobs. Maintenance is also established as a “first cut” for project selection, because regular maintenance is much more cost-effective in the long run and allows for a greater number of projects to be accomplished over time. Further, the ability to obtain outside funding will be considered.”*

First off, you never define what “*first cut*” means ...and you say “*maintenance is much MORE cost-effective*” but never define “*than what*”. Is it more cost-effective than new construction? If so, you need to say that in a complete sentence.

Then you don’t define “*equity*”. Do you mean “*equity between modes*” (bike,pedestrian,transit,car)? ...or do you mean racial equity as in “we have to prioritize this project because it’s in a largely Hmong or African American neighborhood”? This is important because, as written, “*Safety and equity*” are more important than “*maintenance*” or the age of a given piece of infrastructure.

For example, my block hasn’t been repaved since it was built in 1917, over 100 years ago. I have a picture of the brick and manhole covers with dates on them (used for this post). We still have a lead water line coming into my house. I’d like to update it when we get our street redone and save myself \$4000, but the city scrapped its RSVP program before it got to my street and now they’re saying it might not be redone for another 10-20 years (after previously telling us it was going to be redone in 2014). My block is in a fairly affluent, white neighborhood. It is also not a bike or transit route (the other possible meaning of “*equity*” in this context). From the way this paragraph is currently written, I might therefore assume that my street is very low on the city’s priority list. So clarity is important.

Finally, you don’t say what “*support of quality jobs*” means. Yet, like “*safety*” and “*equity*”, you place this above maintenance. So it’s kind of important to define this. Do you mean “*transportation access to quality jobs*”? ...Or that you will prioritize a project if it pays city

planners, engineers and contractors more money”? The term makes absolutely no sense. What is a “quality job?” One that pays more? More than what?

We see this last problem in **“Policy T-1”**. What does “equity” mean? What does “Support of quality, full-time, living wage jobs” mean? What does “Business support” mean? Does it mean that we will build a bunch of new streets, ramps and parking at taxpayer expense for some stadium developer? ...because that’s what we’ve done for the MLS stadium and for CHS field. Is that more important than “condition and multi-modal usage rates” (in Policy T-2)? Personally, I think T-2 should be policy #1 ...and T-1 should be either T-2 or T-3 (and should be more carefully defined). If all three policies are to be considered equally and there is no hierarchy, you should state that at the outset of the plan chapter.

**For Policies T-1 and T-2**, you need crash data and usage data to prioritize “safety”, “multimodal usage rates” and “equity” (depending on what you mean by equity). Data collection and analysis or “Evaluation” is the most important part of “The Four E’s” (Evaluation, Engineering, Enforcement and Education). The city now collects and maps some bicycle and pedestrian crash data, and it collects and lists some very limited pedestrian/bike count data. By contrast, car usage data is much more extensive—literally every street in the city gets counted and mapped. Bike/pedestrian count data is limited to just a dozen spots in the city. So I’d add a new policy for Goals #1 and #2 that says:

*“The City will endeavor to improve its collection of multimodal crash and count data, especially as regards pedestrians and cyclists. This includes adding the travel directions of crash participants as a reporting requirement for the Public Safety Department, because this will greatly assist the city in designing safer streets. It also includes expanding bicycle and pedestrian counts to more streets and intersections so we can assess the ‘Crash Per Crossing’ rates on different streets and intersections and prioritize ‘safety’ based, in part, on this data.”*

We also need data to evaluate how effective our engineering measures have been. On Marshall, for example, bike and pedestrian crashes have actually risen somewhat since we rebuilt the street with medians and bike lanes. Is this due to increased bike and pedestrian usage rates or a flaw in our design? Since we don’t have count data longer than half a year before project implementation (and only for a few spots), we have no idea whether our infrastructure spending improved safety or made it worse.

The above discussion of data collection, analysis and “Evaluation” should also be mentioned in **Policy T-4** under “components of the program.”

**Policy T-12**, break into two sentences so it reads: “When street design changes involve the potential loss of on-street parking spaces, prioritize safety for all transportation modes. Explore mitigation of lost spaces where feasible.”

**Policy T-13**, you say: “...freight transportation improvements in and near industrial areas of regional economic importance, particularly West Midway, the Great Northern corridor, river industrial areas, and the portion of West Side Flats east of Robert Street, to improve safety and connections to the regional transportation network.”

What do you mean by “safety”? Safety for trucks? How about for pedestrians since Midway truck routes like Pierce Butler Avenue is also a bikeway and has numerous important, often unsignalized pedestrian crossings, including at least one for kids going to school. What do you mean by “connections”? Is this referencing a possible “Pierce Butler Extension” in Map T-14?

**Policy T-14**, add the words “and provide safety to pedestrians, cyclists and other road users.”

In general, **GOAL 3** lacks any discussion of truck routes, or what priority is going to be given to trucks on the arterial and collector streets that Ramsey County or MnDOT have decided are truck routes and need to be designed with wider lanes, no bump-outs, and slip turns for higher-speed truck turning radii. These streets, like Seventh and Snelling are among the most dangerous for pedestrians and cyclists in our city, and a lot of this has to do with their design. Not only are these streets three and four lanes but they are three and four lanes that are designed for high speeds and larger turning radii. Other than Map T-15, Policy T-35 is the only place in the plan where truck route consolidation/identification is talked about and only in the context of pavement condition. It should also be discussed in the context of how designing for trucks impacts the safety of non-motorized users.

**Policy T-23**, how will you “anticipate” high pedestrian activity? You should spell this out a little bit. I suggest that combining crash and count data to get ‘crash per crossing’ can give you an idea about latent demand, particularly at unsignalized intersections. When people are repeatedly crossing (and getting hit) in dangerous areas, combined with other factors (like the existence of a school, bus stop, stores or other destinations), it tells you that there is latent demand for better or more numerous crossings on a given street.

More important than **Policy T-24**, is the lack of safe crossings on many of our city’s arterial and collector streets. We see this on 7th Street, Shepard Road, Snelling, Rice, Dale and numerous other streets that can go over a mile between signalized intersections. Because of low vehicle compliance rates in stopping for pedestrians (based on data from “Stop for Me”), traffic “**control**” is sometimes more important than “traffic calming”. With this in mind, you should add a new Policy:

*“Policy T-23.5, Guarantee signalized or safety-enhanced pedestrian crossings of all three and four lane streets at least every quarter mile, because being able to safely cross city streets is a human right.”*

**Policy T-26**, point #3, add “snow-removal” ...or a “Consider public-private partnerships for snow removal on bike lanes and sidewalks”. Because the city is unable or unwilling to do the job, perhaps some of the Universities, churches or major companies could sponsor snow removal along certain stretches of sidewalk or bike lanes.

In general, **you need a policy statement about snow removal**— that the city will spend more time studying the “best practices” (in equipment and techniques) from other cities and commit to keeping at least some of its major bikeways free of snow and ice during the winter. Policy T-32 is the only place I see snow mentioned and just for alleys.

**Policy T-35**, see comment above about “GOAL 3” and trucks.

**Policy T-39**, add “...without increasing its costs.”

**Policy T-40**, add “...unless designing for automated vehicles significantly increases city costs.”

Many automated vehicles currently require signage, signals and other infrastructure that electronically communicates with the vehicles. Implementing some of these technologies would greatly increase infrastructure costs for the city at a time when it is unable to maintain its existing infrastructure. There is a lot of evidence that widespread use of driverless vehicles is a lot farther away than the auto industry would have us believe. The city should avoid spending extra money on it until it's proven and in widespread use around the rest of the country.

**Map T-12** “Forecasted 2040 Average Daily Traffic (ADT)” has not yet been included with the plan but the methodology by which this forecast is conducted needs to be included. I realize the city is getting this data from the MET Council but it needs to request the data's methodology because past forecasts have been grossly inaccurate and failed to take energy costs into account. The 2008 Comprehensive Plan's ADT map predicted major traffic growth on Saint Paul city streets that never came to pass. These projections were often used as justifications for widening intersections or refusing to do 4-to-3-lane or 5-to-4-lane safely conversions of streets that were well within federal guidelines for such conversions.

**Maps T-14 and T-16**: I am totally opposed to the “Ayd Mill Road Redevelopment Project” mentioned in Map T-14 “Future Right of Way Needs” and in Appendix B. No where in the plan is this project spelled out. This road was unilaterally and illegally connected at the south end by former mayor Randy Kelly, over community opposition and without a supplemental Environmental Impact Statement. To include it in a city comprehensive plan without proper public review is illegal and contrary to the notion of “public planning.” Mayor Norm Coleman's task force on Ayd Mill Road chose a “Linear Park” option as did the Lexington-Hamline and Snelling-Hamline Community Councils. The Merriam Park Community Council selected “No Build”. Yet, since 1960, your agency and the city's elected officials keep trying to ram through an Ayd Mill highway connection from I-35 to I-94 over public opposition. It's much the same thing with the Pierce Butler and Kittson Extensions (referenced in Map T-14 and T-16). While other cities are tearing down urban freeways, redeveloping the land, and making money by doing so, Saint Paul is proposing to build new highways. It's byzantine, automobile-addicted thinking of the highest order. How can the Transportation Chapter of this plan state that it prioritizes maintenance, pedestrians and all its other lofty goals when it is planning more roadways that will further divide and segment our communities, increase maintenance costs and Vehicle Miles Traveled, and remove valuable land from possible residential, retail or industrial development?

Finally, for the plan overall, (including the transportation chapter) there should be some policy point that the city will seek to:

*“Work with state and county governments to overcome **legal** issues that create food and service ‘deserts’, where food and basic services are not within walking distance of a given neighborhood. These issues include bank redlining and restrictive lease clauses for grocery stores, lumber yards and other services that require specialized buildings.”*

Lack of groceries diminishes the “livability” of a neighborhood. In acknowledgement of this, Saint Paul went to great expense to build the Penfield Apartments and bring a grocery store into downtown. Meanwhile, when Whole Foods left its store location at Fairview and Grand, no other grocery stores could move into the site because of a restrictive lease clause. With the eviction of Mississippi Market from Randolph and Fairview by Saint Paul Academy, an entire neighborhood is no longer within walking distance of a grocery store. It now takes up to forty minutes of walking and two miles to reach one, which is more than most people are willing or able to do. Another example is the Home Depot in Cottage Grove, which [left the town with a restrictive lease clause, no lumber yard and a vacant property.](#)

Grocery stores or lumber yards require specialized buildings with loading docks, large refrigerators, and large square footage. Given that many of our neighborhoods have a limited supply of such buildings, and given that groceries and building supplies are basic necessities for a functioning neighborhood (and city), the state legislature could end restrictive lease clauses for grocery stores and certain other classes of retail goods and services. The Comprehensive Plan should state that the city will work towards this end.

Andrew Singer

2103 Berkeley Avenue

Saint Paul, MN 55105

651-917-3417

andy@andysinger.com



# 2040 Comprehensive Plan

January 14, 2019, 4:52 PM

## Contents

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## Summary Of Responses

|   |                           |
|---|---------------------------|
| <b>As of January 14, 2019, 4:52 PM, this forum had:</b> | <b>Topic Start</b>        |
| Attendees: 736  | October 31, 2018, 4:51 PM |
| Responses: 95   |                           |
| Hours of Public Comment: 4.8                            |                           |

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### QUESTION 1

#### Name

|          |    |
|----------|----|
| Answered | 81 |
| Skipped  | 14 |

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### QUESTION 2

#### Address

|          |    |
|----------|----|
| Answered | 80 |
| Skipped  | 15 |

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### QUESTION 3

#### Comment

|          |    |
|----------|----|
| Answered | 80 |
| Skipped  | 15 |

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## Survey Questions

QUESTION 1

**Name**

QUESTION 2

**Address**

QUESTION 3

**Comment**



## Individual Responses

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**Name not available**

October 31, 2018, 4:53 PM

**Question 1**

No response

**Question 2**

No response

**Question 3**

No response

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**Name not available**

November 4, 2018, 10:47 PM

**Question 1**

No response

**Question 2**

No response

**Question 3**

No response

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**Dustin Schroeder**

inside Ward 4

November 5, 2018, 10:13 AM

**Question 1**

Dustin Schroeder

**Question 2**

6 Oakley Avenue, St. Paul, MN 55104

**Question 3**

I would like to see a neighborhood node at Snelling and Minnehaha avenues. There is an A-line stop at Minnehaha, across the street from Hamline University (with a heavy student population requiring housing), is

near the Green Line station at Snelling and University and the new Allianz Field, and I've seen a good amount of investment in properties in the first block west and east of Snelling in this area and would like to see this area continue to develop (all along Snelling and nearby blocks). I think multifamily up to at least 6 units should be allowed in the first block on either side of Snelling (Fry to Asbury) from University up to Minnehaha, at the very least, and believe that this would become a driver of much-needed affordable housing options. I'm also interested in seeing details related to property setbacks and allowed density, particularly in neighborhood nodes. I support very accommodating building setbacks (near zero feet on front, sides and back) on lots in neighborhood nodes to allow for less restrictive housing options.

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**Name not available**

November 6, 2018, 11:32 AM

**Question 1**

No response

**Question 2**

No response

**Question 3**

No response

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**Name not available**

November 10, 2018, 1:28 PM

**Question 1**

No response

**Question 2**

No response

**Question 3**

No response

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**Name not available**

November 15, 2018, 1:42 PM

**Question 1**

## 2040 Comprehensive Plan

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No response

#### Question 2

No response

#### Question 3

No response

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### Derek Thompson

inside Ward 2

November 15, 2018, 4:35 PM

#### Question 1

Derek Thompson

#### Question 2

401 Sibley St

#### Question 3

As a young person, this plan represents exactly what I want in a livable community. I want to live in an urban city where walking, biking, and transit are an option. I want a city with great parks and trails for recreation. I want a variety of housing options so I can afford to live in the city. I want to live in an equitable city so that every part of the city is able to thrive.

I believe all these changes will make St Paul a more prosperous city for all it's residents.

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### TYLER REDDEN

inside Ward 5

November 20, 2018, 5:58 PM

#### Question 1

Tyler Redden

#### Question 2

48 Magnolia Ave West, Saint Paul MN 55117

#### Question 3

A comprehensive organics program needs to be developed within St Paul, the most sustainable being the Blue Bag Organix Program offered

through Organix Solutions. This solution can be utilized by any hauler with the use of their organics recycling bags that withstand the compaction of a garbage truck. Mandating the use of this program will prevent a SSO program from adding a new garbage truck to the roads (for each garbage company), reducing carbon emissions and pushing St Paul towards zero waste. The infrastructure needed for this is easily implemented by haulers and there is a definite demand from homeowners and renters. Organic waste is about 33-50% of the waste stream, so utilizing this easily applied program throughout St Paul by all haulers would reduce waste, create a valuable commodity, and extend the life of landfills (and make WTE options like the HERC more efficient). A long term strategy of utilizing the Organix Solutions "Layered Approach" methodology would be a natural next step following this organics program, but the Blue Bag Organix Program (also available as the Green Bag Organix Program) should be implemented using the company's funding model that is highly intuitive and builds in the program costs!

I would be more than happy to answer any and all questions about sustainability if needed - my cell is 651.497.1611. Thank you for your time, I look forward to seeing how we handle organics upcoming and hope my knowledge and experience as a University of Minnesota graduate and Sustainability Studies/Environmental Sciences Major can help!

Ty

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### Amy Riley

inside Ward 1

November 27, 2018, 9:31 AM

#### Question 1

Amy Riley

#### Question 2

1176 Laurel Avenue

#### Question 3

I live in LexHam, a community unlike many others in that we are an extremely close knit and very active group of neighbors. While I recognize that Selby between Lexington and Hamline is a transportation corridor, I absolutely do NOT want to see any giant mixed use residential and retail buildings going up like what happened at the corner of Selby and Snelling. Our community is quiet, walkable and safe and I oppose these two policies specifically:

Policy LU-29: I disagree with increasing density towards the center of the Selby Snelling node between Lexington and Hamline.

Policy LU-34 : I oppose structures being built higher than 3 stories for multi-family housing.

Thank you for the opportunity of making my voice heard. Please keep the

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charm and peace in LexHam. Amy "Lucas" Riley. President of the Lexington Hamline Community Council

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#### Sara Dovre Wudali

outside Saint Paul

November 27, 2018, 12:56 PM

##### Question 1

Sara Dovre Wudali

##### Question 2

1189 Laurel Ave.

##### Question 3

Policy LU-29: I agree with increasing density towards the center of the Selby Snelling node between Lexington and Hamline. I would like there to be more walkable retail in our neighborhood--restaurants, shops, doctor offices. I'd like to see some of the apartments/condos that may be built reserved as low-income options, so a mix of low, middle, and upper income housing. Please not all luxury apartments. But that said, I'd want to protect the Central HS garage and Youth Express on Dunlap/Selby. Adding more retail/appts might necessitate parking restrictions for streets with no alleys like Hague and Laurel so that residents have places to park.

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#### Sharon Garth

inside Ward 1

November 29, 2018, 9:03 AM

##### Question 1

Sharon Garth

##### Question 2

485 Aurora Avenue

##### Question 3

The plan is very well crafted. I want to emphasize the importance of putting people first in economic development programs, education and housing. The needs of low/moderate income, culturally diverse people must be met. Livable wage jobs are a good start and now there must be a focus on affordable housing and cultural diversity planning.

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#### Name not available

November 29, 2018, 9:58 AM

##### Question 1

Thomas Rupp

##### Question 2

459 Wheeler St N

##### Question 3

No response

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#### Name not available

December 3, 2018, 2:51 PM

##### Question 1

Fay Simer

##### Question 2

25 W 4th Street

##### Question 3

test

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#### Lucas Miller

inside Ward 4

December 3, 2018, 6:33 PM

##### Question 1

Lucas Miller

##### Question 2

1702 Laurel Ave #10, St Paul, MN

##### Question 3

Saint Paul needs more transit options as people move into the city. We desperately need transit down main arterial corridors along with options that allow people to get two and from those arterial corridors to businesses, homes and other points of interest. Having access to transit that helps people explore Saint Paul will help businesses and the local economy grow and prosper.

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#### Colleen Schauer

inside Ward 1

December 3, 2018, 6:49 PM

##### Question 1

Colleen Schauer

##### Question 2

1572 Portland Ave Apt. 4

##### Question 3

Policy H-1 calls for maintaining the housing stock through enforcement of city codes. This policy needs additional language/protections that ensures this will not have a disproportionate negative effect on people with low incomes who may not have the resources to do this.

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#### Glynn Murphy

inside Ward 2

December 3, 2018, 6:54 PM

##### Question 1

Glynn Murphy

##### Question 2

66 9th St E, St Paul 55101

##### Question 3

The entirety of the node plan seems like a way to keep diverse growth in our cities in areas that are already diverse and exclude diversity in areas that are currently not diverse.

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#### Connor Schaefer

inside Ward 4

December 3, 2018, 7:00 PM

##### Question 1

Connor Schaefer

##### Question 2

948 Cromwell Avenue, Saint Paul MN 55114

#### Question 3

Please consider adding a goal and/or policy on the following topics:

- Reducing the negative impact of salt and pesticide. Reduce of carbon emissions from park operations
- Support implementation of pop-up parks, either through a pilot project or in coordination with a partner organization.
- Support development near regional parks that is dense, walkable, and has access to frequent transit service. More people need to be able to live within walking distance of regional park facilities.

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#### Name not available

December 4, 2018, 6:42 PM

##### Question 1

No response

##### Question 2

No response

##### Question 3

No response

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#### Name not available

December 11, 2018, 4:17 PM

##### Question 1

Filsan Ibrahim

##### Question 2

721 Van Buren

##### Question 3

I'm wondering why waste isn't mentioned in the plan and is it too late to add a waste section on to the plan?

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#### Jean Schroepfer

inside Ward 1

December 14, 2018, 7:33 PM

##### Question 1

Jean Schroepfer

## 2040 Comprehensive Plan

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#### Question 2

271 Summit Ave

#### Question 3

St. Paul should allow upper-lower duplexes everywhere in the city. Any owner who wants to use the property as a house would be free to do so. Allowing duplexes cuts housing costs in half at no cost to the taxpayers, creates housing opportunities with yards, acknowledges renters as equal human beings, and dramatically reduces Zoning staff's workload (allowing focus on health and safety).

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#### Name not available

December 16, 2018, 10:39 AM

#### Question 1

Thomas E. Kottke

#### Question 2

571 Otis Avenue

#### Question 3

The St. Paul 2040 Comprehensive Plan is a well thought-out document with a vision and core values that identify the appropriate priorities in the face of change and challenge. Climate change will be a very significant challenge for the community as will concentrations of poverty. The population is increasingly diverse, and it will benefit the entire population if every resident has access to education, jobs, and a fair and equitable experience. An emphasis on modes of transportation other than the private automobile will not only assure mobility for individuals who either cannot afford or choose not to own a car, it will improve the health and well-being of St. Paul's residents because the air will be cleaner and opportunities for physical activity will be built into daily life.

The planners, consultants and residents who contributed to the development of this document are to be congratulated.

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#### Kory Andersen

inside Ward 4

December 19, 2018, 9:00 AM

#### Question 1

Kory Lee Andersen

#### Question 2

1703 Ashland Ave Saint Paul Minnesota 55104

#### Question 3

First and foremost I think that St Paul is in a unique position to draw a stark contrast to the Minneapolis 2040 Comp Plan. We've seen the document.

In St Paul we should go farther in making our city a better and more livable place under the challenges of global warming and quickly diminishing resources. Among many strategies, we need to be bold by eliminating parking minimums altogether. I appreciate the roundabout solutions that the comp plan draft currently has to address parking, but given the reality of our world, it is somewhat tone deaf. For decades we have prioritized cars to the detriment of our city. It is time to swing it back and stop preserving SFH owner's non-existent right to parking in the public right of way.

Other key issues that we should consider.

1. Street calming measures citywide--pedestrians attempting cross any unsignalized crosswalk in this city are ignored for minutes until a good samaritan driver actually obeys the rule of the road. Traffic calming looks like larger investment in road reconstructions making shorter turning radi, ADA infrastructure, taking away car space and making it ped space, street trees, etc.
2. Make sweeping zoning changes along major arterials to allow for much higher density housing and mixed goods. Some of the most charming mult-unit buildings in SP are currently illegal under the zoning code. Make it work again! Saint Paul has some beautiful neighborhoods and it makes sense to protect them...but the give should be along major routes.
3. Increase the size of the affordable housing trust fund by levying a tax on property owners. If you increase the density of the city and more ppl can live here, the amount won't astronomical because we would have a larger tax base.
4. Finish the Midtown Greenway to Saint Paul
5. Bus and light rail priority. I know there are a variety of authorities and entities involved with the twin cities transit system and roads. However, the City of Saint Paul does have some part to play in the accessibility and efficiency of our public transit system...not to mention a bully pulpit. It makes zero sense why do dozens of ppl who chose to ride a train or a bus have to wait/contend for space with individuals in single occupancy vehicles. I mean there is a history of stigmatizing the users of public transit/treating them like second class citizens. Let's lead the twin cities in this change! Bus only lanes and LRT high prioritization at signals (should not be waiting at Snelling/University for cars to go by (Also Portland, Oregon has great examples of this)), would go a long way in increasing ridership, reducing traffic, and re-balancing modes of

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transportation.

Those are just a few of my thoughts. Thanks again for all the work you all are putting into this. I know it's a hard process being a planner myself. You can't make everyone happy, but you can make Saint Paul a city that is fully ready to deal with the REAL challenges of the coming decades by being bold now. Keep up the good work!

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#### Name not available

December 27, 2018, 3:43 PM

##### Question 1

No response

##### Question 2

No response

##### Question 3

No response

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#### Name not available

January 3, 2019, 12:22 PM

##### Question 1

No response

##### Question 2

No response

##### Question 3

No response

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#### KC Cox

inside Ward 1

January 4, 2019, 8:47 AM

##### Question 1

KC Cox

##### Question 2

1501 Carroll Avenue

##### Question 3

My biggest concern regarding the 2040 plan is the idea that a single dwelling home is not the correct goal for individuals or families. That highest density possible is the goal. The thought of a 6 story building next to my single dwelling home doesn't bode well. Multifamily dwellings should match the neighborhood - not stand out. The idea that changing neighborhoods into nothing but tall building after tall building after tall building is not a good vision. It also seems that auto transportation is to be banned. Public transportation doesn't always work for everyone. I also hope that the parks and green space will remain. Every space doesn't have to be "covered".

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#### Name not available

January 4, 2019, 12:51 PM

##### Question 1

Jace Schroeder

##### Question 2

838 Laurel Avenue, St. Paul, MN 55104

##### Question 3

I support additional housing density along and around Snelling Ave in the Midway neighborhood.

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#### Frank Alarcon

inside Ward 4

January 4, 2019, 2:16 PM

##### Question 1

Frank Alarcon

##### Question 2

2700 University Ave W, APT 608

##### Question 3

As a resident of Saint Paul, I would like the comprehensive plan to abolish single-family zoning and minimum parking requirements, like the Minneapolis 2040 plan. These policies restrict the supply of housing and raise the cost of development, contributing to the region's housing crisis that disproportionately harms people of color and people with low

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incomes. They also exacerbate climate change by guaranteeing space for cars and reserving swaths of the city for single-family homes only.

Thank you.

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#### Name not available

January 4, 2019, 5:15 PM

##### Question 1

No response

##### Question 2

No response

##### Question 3

No response

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#### Name not available

January 4, 2019, 5:21 PM

##### Question 1

No response

##### Question 2

No response

##### Question 3

No response

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#### S S

inside Ward 1

January 5, 2019, 3:04 PM

##### Question 1

Resident

##### Question 2

Prefer not to give

##### Question 3

There are many things to like in the draft plan, but one glaring absence is a focus on supporting education. Jobs and economic vitality, parks and open spaces, equity, transportation--all these important topics are considered, but not education. This plan should include stated support for education and educational institutions: SPPS, K-12 public charters, K-12 private schools as well as early childhood and higher education. The Land Use section should specifically call out educational uses, and encourage and support quality educational facilities within our city. Good schools are an attraction to families, an investment in the future, and a tool to help achieve many of the goals of the plan: equity, high quality of life for all St Paulites.

A section dealing with conflict is also missing. What about when there are competing stated goals within the comp plan? What about when there is a controversy? Town and gown issues, or historic designation against the will of the property owners, the desires of a group of neighbors to preserve their neighborhood's character of small homes versus the need to provide quality affordable housing? General guidelines for making decisions when there are competing sections within the comp plan would be helpful.

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#### Kathleen Kelso

inside Ward 3

January 6, 2019, 5:54 PM

##### Question 1

Kathleen Kelso

##### Question 2

2155 Jefferson Ave., Saint Paul

##### Question 3

January 11, 2019

To: Saint Paul Planning Commission

Fr: Kathleen Kelso, Saint Paul Advisory Committee on Aging, Member and Past Chair

Re: Support of the Draft 2040 Comprehensive Plan

On behalf of ACOA, we appreciate this opportunity to support the Draft 2040 Comprehensive Plan.

The Saint Paul Advisory Committee on Aging (ACOA) submitted our recommendations for the City's 2040 Comprehensive Plan in 2017 entitled Reframing Aging: Opportunities for Aging in Community. We recommended that themes aging in community and healthy aging be given critical attention as we prepare for an demographic shift that will require new housing models, new transit models, and broad based



## 2040 Comprehensive Plan

### 2040 Comprehensive Plan Public Feedback

connectivity. Our recommendations address the essential question we all must answer if we want to continue to live in Saint Paul: Where and how will we live as we age?

In a Saint Paul - Ramsey County Healthy Aging report, it is noted: According to the Minnesota State Demographic Center, by 2030 Ramsey County's population 65 years and older will nearly double from 2015 numbers, while the younger population will decrease. This demographic shift means fewer people in the workforce, increased need for health and social services (e.g. in-home care, case management), increased demand for affordable and accessible housing and transit, walkable community environments, and leisure and educational services – all of which come at a significant cost to local governments, educational agencies and nonprofit organizations. This demographic shift and consequent increase in demand for services compels local government to facilitate community-based planning and services that will promote health and vital aging and maximize contributions of our older population while minimizing expenditures (Smith, Tingle, Twiss, 2010).

It is readily apparent that we don't have decades to address solutions for the aging demographic which has already arrived. We face urgent conditions that demand a change from the status quo in the way we lead by design of our City Plan and engage people of all ages to implement this Plan. The ACOA is eager to assist in the implementation process.

We are encouraged by public discussion that shifts our focus from dwelling places for old people (where we are more likely to age alone and in isolation) to communities where relationships continue to create social and community supports - necessary for people of all ages to remain and thrive in our communities.

Again, ACOA members are grateful for the clarity and support given to the Focus Areas in the Draft Comprehensive Plan, aging in community and community health, woven throughout the Plan. We believe the implemented Comprehensive Plan will create a city where people of all ages can grow up and grow old. This Plan demonstrates that Saint Paul is ready to "reframe aging," positioning this demographic as the economic investment it is and will be.

We are confident the implemented Comprehensive Plan will become regionally and nationally recognized for its intentional work and results in creating an intergenerational city that embraces aging in community.

The ACOA is a volunteer body appointed by the Mayor and City Council to promote the dignity and independence of older residents. Members of ACOA believe that the city of Saint Paul must respond wisely to our aging demographic and the myriad challenges it presents.

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#### Michael Stoick

inside Ward 3

January 7, 2019, 1:44 PM

##### Question 1

Michael Todd Stoick

##### Question 2

2206 Highland Parkway

##### Question 3

The comprehensive plan should include zero-waste education and the promotion of zero-waste schools. Zero-waste doesn't mean that there is absolutely zero trash it just means that we don't waste any opportunity to reduce, reuse, recycle, and compost.

We absolutely need a sustainable compost program to compliment the blue bag compost system that the city plans to roll out. A sustainable option for people to drop off compostable organics at neighborhood drop off sites including schools and churches that are part of the organics drop off network so everyone could walk to a drop off location.

Recycling is something that we can do that is good, but zero-waste recycling is even better.

Zero-waste Recycling should be part of our community education, school curriculum, and way of life. Instead of just looking for hope for a brighter future we all need to look for ways we can act, because when we act hope is everywhere and in everything we do.

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#### Eric Osekowsky

inside Ward 4

January 7, 2019, 6:57 PM

##### Question 1

Eric Osekowsky

##### Question 2

678 Aldine St.

##### Question 3

I'm composing this comment to share my support for the 2040 plan. I support the overarching development and transit goals it contains. I have no particular items I want to call out. Instead, I simply want to voice my desire that St. Paul continues to grow and change to fit its residents as cities must. I do not agree with those residents who seem to have our wonderful city confused with a suburb of Minneapolis and reflexily resist change, as exemplified by the fight over the Ford plant redevelopment.

The one area I would like to comment further on is development of transit corridors and the identified Nodes. Looking over the 2040 plan I'm pleased see, what appears to be, an intention to encourage mixed use development along essentially all of St. Paul's significant transit corridors (p. 43) guided by the intention to make efficient use of transit infrastructure (p. 52). I hope the city continues to push for significant



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change (where appropriate) as we saw earlier this year with the rezoning study for Snelling south of 94.

In particular I'm thinking of my neighborhood, Midway, where I live a couple blocks off Snelling. Being right off both the A line and the green line, a short drive from 94 and right between both downtowns I often think about how the composition (and zoning) of this stretch of Snelling as it stands now is a poor use of an area with a very valuable location and fantastic transit options. Given the amount of investment which has gone into the Green and A lines, and the potential unlocked with the redevelopment of the Midway shopping center I hope St. Paul looks beyond the immediate Snelling & University Node area when executing this plan. And I really hope we see a zoning study for the north end of Snelling Ave.

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#### Name not available

January 8, 2019, 11:25 AM

##### Question 1

Nancy Wagner

##### Question 2

1049 Linwood Ave

##### Question 3

St. Paul - 2040 Comprehensive Plan - Nov 2 Draft  
Comments by Nancy O'Brien Wagner, January 7, 2019

All maps should clearly show which spaces are parklands and cemeteries. It is misleading to not differentiate these spaces when outlining things like "poverty rates" or "households with out cars."

Since the bulk of St. Paul's infrastructure and neighborhoods were established by 1950, it would be useful to have a graph showing population per decade from 1950-2018, with estimated growth for next thirty years. Also – show decreasing household size numbers. We still have a lower population than we did that – if more people understood that, plus the lower household sizes, public conversations about density and growth (or re-population) would be better.

Missing: where increasing solar power and green building technologies in city-owned buildings?

Parks and Recreation Section.

Wasn't the goal to have a park accessible to all residents within a five-minute walk last time? That was a FANTASTIC goal! Also – there was a recognition of the value of having pocket parks. Where did that go?

Also- where is the map that shows the location and five-minute (or ten-minute) walk radius to parks and community centers? Those of us who live in park desserts want the City to acknowledge and address that. That MUST be included.

Page 95 - The information on what perceived barriers exist for minority residents in regards to parks is only helpful if you also describe what perceived barriers exist for white residents. You may actually be creating or perpetuating a false sense of differences between groups. (I suspect time, and lack of awareness might apply to white visitors, too.)

Goal 3 – Environmental and Economic sustainability.

Parks should promote environmental stewardship. Where is that strand? Parks should promote recycling and water quality protection by offering recycling at the parks and within the recreation centers.

PR-21 – Having parks be responsible for promoting "job training" is ridiculous. Get that out of there and put it into economic development.

Page 96 – Goal 3 title and Policy PR-25. Remove goal of economic self-sustainability for park programs. We shouldn't expect parks, museums, schools, or libraries to pay for themselves. Their rewards are not economic, and we shouldn't even use this type of language here. I am okay with saying "consider the economic return-on-investment of programs, in addition to their natural and social benefits."

Where is the reference to protecting the natural assets of parks? The water resources? The animals and wildlife?

The only mention of beauty comes in a reference to encouraging private entities to beautify their lands. Shouldn't public parks be beautiful?

Housing:

Isn't "Decent, Safe, and Healthy" redundant? Just one of those words would do it.

Where the promotion of solar power? Where decreasing parking requirements?

The promotion of mixed and "missing middle" housing is fine. DO NOT FOLLOW MINNEAPOLIS INTO THE "3-UNITS ALLOWED EVERYWHERE" model.

Water

Where improve public knowledge and awareness of water quality issues and best management practices?

Where improve access to and protection of natural bodies of water?

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#### Shirley Erstad

inside Ward 4

January 8, 2019, 5:09 PM

##### Question 1

Shirley Erstad

##### Question 2

1660 Laurel Avenue

##### Question 3

Comp Plan, housing comment

Introduction, page 7, paragraph regarding Aging housing and infrastructure. "While older housing may initially be more affordable, the extraordinary maintenance costs could lead to neglect and loss of the stock over time. This adds to the challenge of maintaining diverse and affordable housing options in Saint Paul."

—The use of "extraordinary" is noteworthy. What is the measurement for "extraordinary" or is it based on assumptions?

—This also implies new housing won't become old housing.

—It makes broad assumptions that older homes are more expensive to maintain. That may be true in some cases, but not in all. Like anything, if routine maintenance is done, it saves money in the long run.

—If a furnace goes out, is it substantially more expensive to put one in an older home versus a newer home? Perhaps, perhaps not, but if so, is it to the point that the old house should be torn down to put up new housing (again, presuming that somehow the new ones don't age) because this is "extraordinary maintenance costs"?

—Naturally occurring affordable housing (NOAH) can be purchased and sweat equity can make the home a good investment. This statement assumes no one puts in sweat equity.

—The environmentally "greener" house is the one that's already there. There have been a lot of articles written about this.

—Older housing stock used materials that are no longer available. Old-growth hardwoods cannot be widely used today, adding value to some older housing.

—Older housing was built using some methods that also make them highly desirable today. I live in a house that is over 100 years old, has appreciated in value (and held steady during the downturn in the economy), and has a roof that builders today say they couldn't begin to

copy.

—Labor shortages, particularly of skilled workers, mean quality building costs more money. We had some work done on our house last year and it quickly became clear some of the construction was being done incorrectly because the labor was unqualified.

For these reasons, I believe the assumption in the draft statement that somehow new housing is cheaper than old housing doesn't hold up. If that is an underlying principle of the housing chapter, this needs much more work.

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#### Elisabeth Wurtmann

inside Ward 1

January 8, 2019, 9:54 PM

##### Question 1

Elisabeth J Wurtmann

##### Question 2

1555 Selby Ave, Apt 417, Saint Paul, MN 55104

##### Question 3

Saint Paul should set a 2040 comprehensive plan that supports affordable housing by increasing density. I strongly support Policy H-48 to "expand permitted housing types in Urban Neighborhoods...to include duplexes, triplexes, town homes, small-scale multifamily and accessory dwelling units." Further, I urge the city to pass a plan written to allow significant increases in density in the Neighborhood Nodes, with an increased number of nodes. Additionally, I support the elimination of parking requirements to allow increased density and a greater emphasis on our city's strong public transit options.

A plan that emphasizes affordable, dense housing is important to me because it will help reduce racial segregation, help low-wage workers live closer to higher-wage urban jobs, benefit the city economically by supporting population growth and property tax-base growth, and allow our city to address climate change.

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#### Name not available

January 8, 2019, 9:55 PM

##### Question 1

Elisabeth J Wurtmann

##### Question 2

## 2040 Comprehensive Plan

### 2040 Comprehensive Plan Public Feedback

1555 Selby Ave, Apt 417, Saint Paul, MN 55104

#### Question 3

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#### Elena Gaarder

inside Ward 4

January 9, 2019, 9:42 AM

#### Question 1

Elena Gaarder

#### Question 2

2314 University Ave W. Suite 18, St. Paul, MN 55114

#### Question 3

Given there is no formal Economic Development Section, the following comments relate/could be included in both Major Trends Informing Policy and Challenges/Opportunities:

Across the country, an unprecedented number of business owners are on the road to retirement, with nearly 80% not having a succession plan. Nationally, there are 2.35 million business owners at/nearing retirement age. This impacts 24 million jobs and will potentially reduce the municipal tax revenue that is generated through their \$5 trillion in combined sales. The trend has significant implications for business/job retention and growth.

In St. Paul, 3,953 of the 10,600 privately owned businesses are at-risk (as defined as having business licenses over 15 years old.) This represents 98,600 jobs. The majority of these businesses are concentrated in the Downtown area.

Fortunately, there is a way forward. Business conversions to employee ownership is being used around the country (and locally) as an economic development strategy that is good for business, good for workers and

good for communities. For employee-owners, it has been demonstrated that household net worth is 92% higher, median job tenure is 53% longer and median income from wages is 33% higher.

The changing face of business ownership and the resulting transfer of wealth presents a unique opportunity for St. Paul. Using this approach allows stakeholders in the city to prevent the erosion of the business sector and job base. It also provides a profitable exit strategy for current owners and new options for equity-driven economic and workforce development.

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#### Jason Peterson

inside Ward 1

January 9, 2019, 10:00 AM

#### Question 1

Jason Peterson

#### Question 2

533 North Dale Street, St. Paul, MN 55103

#### Question 3

January 9, 2019

Saint Paul Planning Commission  
15 Kellogg Blvd. West  
Saint Paul, MN 55102

Dear Saint Paul Planning Commissioners,

I applaud the work to date on the creation of the 2040 Comprehensive Plan for the City of St. Paul. As both a resident of St. Paul and an employee of a non-profit that works on affordable homeownership programming in St. Paul, I appreciate the effort and thoughtfulness that has gone into the plan to date.

I am writing today as Executive Director of NeighborWorks Home Partners. Our organization's homeownership programs seek to empower and strengthen a family's wealth through obtaining and maintaining one of the largest and most important investments they can make – their home. What differentiates us from other similar organizations is our comprehensive combination of full-cycle services that we offer. We are able to meet the needs of potential and current homebuyers before, during, and after their purchase in St. Paul.

NeighborWorks Home Partners has been a proud partner of the City of St.

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Paul for close to forty years. We have worked hand-in-hand with the City to help literally tens of thousands of families achieve and maintain their dream of homeownership. We are very excited about the recent commitment to affordable housing and look forward to continuing to partner with the City to help even more families with their dream of homeownership. We are grateful for this partnership and the following comments are not meant to detract from this great work. Rather, they are suggestions on how to strengthen the housing portion of the 2040 Comprehensive Plan.

The City of St. Paul currently faces an affordable housing crisis. Mayor Carter has stated as much and the City Council acknowledged this issue with the affordable housing resolution passed in July of 2018. I applaud the recent actions taken by the City to devote additional resources to support housing in St. Paul but that is just a start.

There are a number of ideas included in the 2040 Comprehensive Plan to create and preserve affordable housing in St. Paul. Many of these ideas involve continuing activity already taking place. Unfortunately, the current pace of preservation and creation of affordable housing in St. Paul is lagging far behind goals and, more importantly, need. As the 2040 Comprehensive Plan is a chance to set forth bold strategies for the next 20 years, I would encourage you to go further. Perpetuating current ideas will not get St. Paul to a place in which we are meeting these goals or the demand in the community. The current plan does a good job of inventorying current activities but I would challenge you to consider what new and innovative strategies you could put forward to help close this gap. It would be beneficial to see specific tools and strategies included in the 2040 Comprehensive Plan around housing to meet proposed goals and need in the community.

Finite resources are certainly one reason why a gap remains between the availability of affordable housing and the need within the community. An area which is lacking in the plan is an emphasis on leveraging partnerships within the community. The City of St. Paul as many great partner organizations doing work around affordable housing throughout the City. It would be great to see the 2040 Comprehensive Plan include specific language around proactively partnering with the nonprofit development community to leverage their dollars for a greater impact.

While I am very excited for the creation of the Housing Trust Fund and the initial investment into this fund, at this time, there is no dedicated funding source to keep this fund going. I would strongly encourage you to commit to funding affordable housing via a Housing Trust Fund model by making a dedicated source of funding a goal in the 2040 Comprehensive Plan. Also, the funding sources listed in the 2040 Comprehensive Plan and the appendices are primarily current funding streams from traditional sources. As mentioned above, the current production is not meeting demand and I challenge you to consider how you will meet this demand without additional resources. As such, I would encourage you to consider how the City of Saint Paul will increase its competitiveness for state or philanthropic resources in this plan. I strongly feel this should be tied into leveraging your partnerships in the community as many partners are

willing to raise additional dollars if the City were willing to also make an investment in this work.

Throughout the draft the housing sections of the 2040 Comprehensive Plan, the word "encouraging" can be found many times. While it is great to "encourage", I would challenge the City to go beyond and look how to better spark action. For example, the City could encourage a landlord to keep a rental property affordable or the City could incentivize a landlord to keep a rental affordable. A City could encourage development by a non-profit within the City or they could invest in the non-profit to leverage their dollars for development. Encouragement is great but other tools are likely more effective to get work done.

NeighborWorks Home Partners is proud of our partnership with the City of St. Paul. We also applaud the recent emphasis on affordable housing and the commitment of financial resources to combat this challenge. We are committed to continuing our vital homeownership programs in St. Paul and stand ready to help the City of St. Paul in any way we can to meet the affordable housing needs in our community. We look forward to partnering with St. Paul to meet the goals included in the 2040 Comprehensive Plan and help St. Paul families buy, keep and fix their homes.

Best Regards,

Jason Peterson  
Executive Director  
NeighborWorks Home Partners

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### Caitlin Magistad

inside Ward 1

January 9, 2019, 11:01 AM

#### Question 1

Jim Roth, President & CEO of the Metropolitan Consortium of Community Developers

#### Question 2

3137 Chicago Ave, Minneapolis, MN 55407

#### Question 3

Dear Saint Paul Planning Commissioners,

The 2040 Comprehensive Plan is an opportunity for the City of Saint Paul to align existing and emerging strategies and resources to guide the City's growth and development. As the Saint Paul Planning Commission considers the draft 2040 Comprehensive Plan, the Metropolitan Consortium of Community Developers (MCCD) would like to comment on

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the Plan's housing goals and policies. MCCD is an association of nearly 50 nonprofit community development organizations committed to expanding the wealth and resources of neighborhoods through housing and economic development initiatives.

MCCD appreciates the Planning and Economic Development (PED) department's community engagement efforts for the Comprehensive Plan, as well as the City's continued attention to affordable housing and economic development. Housing affordability is crucial for the City of Saint Paul; as the Saint Paul City Council acknowledged in its July 2018 affordable housing resolution, urgent action is needed to address the City's housing crisis.

A robust comprehensive plan will help create a Saint Paul in which all residents and neighborhoods benefit from holistic, equitable community development. Implementation strategies and tools currently listed in the draft plan reflect many of the City's current affordable housing strategies. Although these continue to be important, the comprehensive plan is an opportunity for Saint Paul to develop new strategies and tools to address the city's changing housing needs. To address the large and growing deficit of affordable housing in Saint Paul, and to ensure all neighborhoods have a range of housing types and affordability, the draft comprehensive plan must include more specific tools and strategies, as well as sequenced implementation steps.

Increasing safe and stable housing opportunities for Saint Paul requires that we actively invest in our housing infrastructure. MCCD is encouraged by the recent creation of an Affordable Housing Trust Fund in Saint Paul, and believe the City should proactively partner with the nonprofit development community to increase the leverage of the Trust Fund's resources. A shrinking affordable housing stock, population growth, and a high-number of already cost-burdened households all underscore the need for robust dedicated funding streams for the preservation and production of affordable housing. While the draft plan housing chapter mentions various potential funding sources in its appendices, it does not elaborate on how the City of Saint Paul will increase its competitiveness for state or philanthropic resources to support the goals and policies outlined in the chapter.

The draft comprehensive plan also does not yet address how the City will meet specific housing production goals required by the Metropolitan Land Planning Act and the Metropolitan Council 2040 Housing Policy Plan: 1,973 affordable housing units over the coming decade, 832 (42%) of which should be affordable to households at or below 30% of Area Median Income (AMI). It is concerning that the current draft lacks detailed information on fiscal and policy tools to develop housing for residents at or below 30% of AMI. Producing deeply affordable housing requires operating and rent subsidies. The City must develop new revenue sources and strategies to prioritize assistance for extremely low-income households. The City of Saint Paul also has a large need for housing that is affordable to households earning 51-80% of AMI. 1,013, or 52%, of the City's affordable housing allocation from the Met Council should be available to these households, yet the draft plan lacks

specificity of how resources will support affordable rental or ownership opportunities for households between 51-80% AMI.

Saint Paul's existing housing stock requires urgent attention. As noted in the draft, ensuring existing housing is well-maintained was a key theme from community engagement. MCCD supports the preservation-focused policies to support Goal 1 of the Housing Chapter: Decent, safe, and healthy housing for all Saint Paul residents. The final version of the comprehensive plan should include more detailed information about how the City will increase its attention and resources for preservation strategies. Expanding the City's capacity for small building rental rehabilitation programs, combined with nonprofit ownership for maximum impact, are needed to improve this housing stock and maintain its affordability. Additional investments in home improvement programs for homeowners with low incomes are also needed to ensure preservation strategies are focused along the entire continuum of housing in Saint Paul.

Troubling and harmful racial disparities continue to limit the City's progress towards economic inclusion. The comprehensive planning process highlights that the ways in which people move in and out of neighborhoods are not accidental -- residential patterns reflect segregation and differing access to opportunity by race and ethnicity. As Saint Paul grows, community development investments must be made through a lens of fair housing and racial equality. In the current draft plan, there is a lack of targeted policy solutions for communities of color, especially American Indian/Native American and African American populations. The City has a responsibility to guide land use and community investments to meet our changing demographics, while also working to overcome discriminatory housing practices that have limited opportunities for communities of color.

MCCD and our members envision a Saint Paul in which all residents can afford their home, and have meaningful choices in where they live. To achieve this vision, MCCD and our members are eager to actively work with the City to address Saint Paul's housing affordability crisis. The production and preservation of affordable housing is incredibly complex, and requires significant collaboration. Nonprofit community developers play an integral role in creating and preserving affordable housing, even when the market or the specifics of a project are challenging. We look forward to further refinement of the City's comprehensive plan, particularly increased specificity for local sources of funding, and local policies and strategies that will result in meaningful implementation to meet existing and projected housing needs.

Thank you for your time and consideration.

Sincerely,

Jim Roth  
President/Chief Executive Officer  
Metropolitan Consortium of Community Developers

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#### **Kate O'Connell**

inside Ward 4

January 9, 2019, 7:25 PM

#### **Question 1**

Kate O'Connell

#### **Question 2**

1506 Simpson Street, 55108

#### **Question 3**

Thank you for all of the excellent work that has gone into this plan. I strongly support the goal of addressing disparities in various ways to help address some effects of historically biased policies. Such goals and policies benefit not only the direct participants but the City as a whole. When each person has a reasonable chance to bring their best to the community, the city as a whole benefits.

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#### **Name not available**

January 9, 2019, 9:07 PM

#### **Question 1**

Tyler Tegatz

#### **Question 2**

2031 Itasca

#### **Question 3**

Multi-family housing should be allowed everywhere. Pedestrians, cyclists, and transit riders should be prioritized over drivers of cars and trucks.

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#### **Name not available**

January 10, 2019, 11:14 AM

#### **Question 1**

tom Dimond

#### **Question 2**

2119 Skyway Drive

#### **Question 3**

Tom Dimond  
2119 Skyway Drive  
Saint Paul, MN 55119

2040 Comprehensive Plan - comments on District 1 submittal

As a resident of District 1 and a long time supporter of District Councils, I was deeply saddened and disappointed by the apparent few who hijacked the voice of our neighborhood. District Councils were established as City funded organization to help amplify the voice of the neighborhood on land use issues at City Hall. Taxpayer funding was never intended to be used to diminish the voice of the neighborhood residents. From what I see as a resident the letter from District 1 rips the megaphone right out the hands of our neighborhood.

Everyone can and should submit their comments on issues. I find it disgraceful when a few try to present themselves as speaking for the community at large.

The letter I read and as I understand it does not resemble adopted positions of our Highwood neighborhood. There were about five members of the public at the Land Use Committee meeting. Only one member, other than myself spoke and I was the only one to submit written comments. I could not stay for the full meeting but neighborhood residents were not allowed to participate in discussions on our neighborhood plan. There were no handouts about what the land use committee was going to consider so the public was denied a the ability to comment on their neighborhood plan. We were only allowed two minutes to make a presentation before we knew what was being proposed. I commented on the City Draft Plan. The public was effectively excluded from any give and take about our neighborhood plan. The Committee did not notify the public of any proposed changes to our neighborhood prior to the meeting and any chance to speak. This can in no way be considered a neighborhood recommendation. The City will hopefully treat it as such.

The arrogance is stunning. There has been extensive planning done for Highwood that has included the public, City of Saint Paul, Ramsey County, Department of Natural Resources, and Ramsey Washington Watershed District to name a few. Documents and recommendations were available to everyone. Extensive planning has been done over years considering input from many professionals and residents. It has also included extensive on site reviews. The plans have been adopted and readopted. The plans have been approved by the neighborhood, District Council, and City Council.

The adopted Highwood Plan includes the recommendation that if Totem Town is no longer needed for corrections it should be retained as public open space. Variations of this have been the City and County position for the better part of a century. The City or County or both have owned this property for a century. The County preserved the corrections property at Lower Afton and Century as parkland (golf).



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When the County announced they may no longer need Totem Town, the neighborhood pointed out the long standing position to retain the land as public open space. It is a beautiful property with ponds and bluffs over most of the site. The area also serves as a neighborhood gardening, leaf collection, and compost site.

A small group at District 1 insisted on a review of the policy to retain Totem Town as public open space. At first there were attempts to exclude people from the discussion. The neighborhood insisted on open public meetings. Time and again, over the last couple years the open meetings have filled large rooms with well over a hundred people and the overwhelming majority voted to keep it as public open space. This is the adopted city position.

District 1 repeatedly told the neighbors they were not pushing any agenda. The arrogance of this letter on District 1 letterhead supporting the designation of Totem Town as an "Opportunity Site". Opportunity Sites are designated having potential for higher-density mixed-use development, employment centers, and community services. The neighborhood has clearly rejected this and adopted City policy does not support this.

The letter calls for reduction of environmental protections in Highwood with increased density housing and changed land use. This flies in the face of the adopted Highwood Plan and Critical Area protections that are in place. The letter calls for a neighborhood node at Carver and Point Douglas that would have the equivalent of T1 zoning. The letter calls for changing the zoning in South Highwood along Point Douglas, Highwood, Carver and McKnight to higher density. It pushes for construction of more sewers. It pushes for cluster development that radically increases density of housing, and it calls for changing zoning with public utilities in South Highwood. This is calling for a radical reduction of environmental protections and an increase in environmental impacts from higher density development, increased traffic, impervious surface. a loss of forest, natural areas and habitat. District 1 never held a public meeting to tell us about their proposed radical changes to our neighborhood.

It is the definition of arrogance and hijacking a district council.

The letter goes on to state: We inherited a legacy of zoning and land use policies that were used to advance the interests of white homeowners and protect white privilege by directly and indirectly designating where different racial groups were allowed to live in our City.

If there are zoning districts or land uses that mention race the authors should submit the evidence. The statement serves no good purpose. It is insulting to those who live and work in our City.

The letter states: An increase in landslides could cut parts of the city off from one another, a challenge especially concerning Highwood where there are few ways to get in and out of the neighborhood. Drought and freight disruptions could limit the region's access to food at times.

I suspect Highwood residents are more concerned that zoning changes be considered based on the letter. This letter is in direct conflict with the real neighborhood plan. We were excluded. We deserve better.

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### Shirley Erstad

inside Ward 4

January 10, 2019, 12:33 PM

#### Question 1

Shirley Erstad, on behalf of Friends of the Parks and Trails of St. Paul and Ramsey County

#### Question 2

1660 Laurel Avenue, St. Paul, MN 55104

#### Question 3

Please note: I sent a pdf copy to Planning staff as this comment format does not allow indicating text in red to add or strikethrough to delete, making some of our text suggestions hard to follow. Please let me know if you need a pdf copy for easier reference and I'm happy to provide it.

Friends of the Parks and Trails of St. Paul and Ramsey County, a local non-profit membership organization, was established in 1985 when a development was proposed for Crosby Farm Regional Park. A group of concerned citizens banded together to speak on behalf of our priceless parks, trails and open spaces.

The introduction to the Parks, Recreation, and Open Space Chapter of the 2040 Comprehensive Plan draft states, "The Saint Paul park system comprises a large, diverse and vibrant network of people, spaces and facilities that is recognized by Saint Paul residents as one of the city's great shared assets."

It goes on to say that, "Park facilities and programs improve the quality of life...foster public health...serve an important role for the city's youth by providing safe and healthy places and activities...connect us to the Mississippi River and lakes...and are an important component of sustainable economic development, drawing and retaining residents, increasing nearby property values and attracting businesses." We couldn't agree more.

We appreciate and applaud the recognition this draft gives to not only the environmental benefits of parks, recreation, and open spaces, which are more intuitively acknowledged, but also the economic, social, and health benefits they provide. Parks are fundamental building blocks when seeking environmental and economic sustainability, one of the five goals guiding the Parks, Recreation and Open Space Chapter.

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We recognize this draft was composed with the intention of being a more high-level document than previous iterations. Bearing that in mind, we strongly encourage incorporating language into the Parks, Recreation, and Open Space Chapter that reiterates the importance of community input in development planning and vigilantly maintaining public access throughout the system.

It is important that mention be made of the No Net Loss Provision in the Saint Paul City Charter. This provision is highly relevant to all development decisions involving our park system and yet there is no reference to it.

There is currently no official map of the city's parkland, making the goals of maintenance and asset management particularly challenging. We recommend the city make mapping parkland a priority.

The current Comprehensive Plan calls for a parkland zoning designation. That designation has yet to occur. When reviewing the six Focus Areas of the entire Comprehensive Plan draft (equitable cities, aging in community, community/public health, economic development, resiliency, and urban design) parkland zoning would be a tool to help achieve them.

There is no mention in the draft of the Parkland Dedication Ordinance. While we recognize this is a high-level document, given the goals of the plan and the value statements, and knowing it will be referenced when making funding and development decisions, it may be helpful to make note of this valuable tool that can help us reach the desired outcomes of resiliency and sustainability.

Specific item notes on the Parks, Recreation and Open Space Chapter: red text indicates additional suggested language and strikethrough indicates suggested text removal.

Policy PR-1. Ensure equitable access to Parks and Recreation programs, resources and amenities including, but not limited to, racial, ethnic, income, ability, and geographic diversity. (The goal is that the users of the system are reflective of the population, not solely addressing physical access to parks but actual equity of use and opportunity. This also relates to PR-4.)

Policy PR-9. Use systematically-collected customer and resident feedback on needs, satisfaction and trends to improve park experience and bring in new users. (We make this recommendation to clarify between systematically collecting valuable feedback on which to make important decisions versus relying on a complaint-based system. Too often, when systems are based on complaints, it's the "squeaky wheel that gets the grease" and those that don't realize the necessity of speaking up or feel uncomfortable doing so are left behind.)

Policy PR-10. Embrace and integrate emerging cultural and recreation trends, particularly those that meet the recreational needs of youth, underserved populations and emerging resident groups. (How will these

trends be determined?)

Policy PR-24. Develop shared-use facilities as a first option when contemplating new or replacement indoor recreation facilities while recognizing the importance of maintaining public access. (Privatization of public facilities doesn't seem to be the goal here so it's important for that to be put in writing somehow.)

Policy PR-26. Use data-driven evaluation of all park assets to develop a maintenance and replacement schedule, and plan for future budgetary needs. (We recognize the 2017 Ameresco report regarding capital assets, but this will be difficult to accomplish without comprehensive and accurate mapping of all parkland resources. The city needs to prepare accurate boundaries of parkland within the city to be able to accurately monitor those resources, thus our recommendation to make such mapping a priority.)

Policy PR-29. Seek out partnerships with private entities to finance capital and maintenance costs of Parks and Recreation facilities without compromising good design solutions, reducing public access or over-commercializing the public realm.

Policy PR-34. Prioritize safety and equity when filling gaps in the trail and bikeway system to ensure seamless connections throughout the city for pedestrians and bicyclists of all ages and abilities. (How will equity be used in this way? What approach will be used to evaluate?)

Policy PR-40. Provide consistent wayfinding signage in each project or park so that it is recognizable as part of the broader City system while being cognizant of the negative impacts of signage in natural areas.

Policy PR-41. Involve staff from the Department of Parks and Recreation and park and community advocacy groups from the beginning in the early stages of discussions regarding large-scale land redevelopment sites. (We acknowledge staff plays an important role when meeting with developers at the beginning of projects and we certainly don't intend for this to be an interference with that. However, we believe it is reasonable that the public should be involved in the early stages of large-scale developments and not just after potential uses have been whittled down to certain choices.)

Policy PR-42. Address physical park encroachments that impair use through effective parkland management and protection. (Accurate mapping of existing parkland is required so that this can be done. It is not possible without it.)

We thank you for this opportunity to comment and congratulate city staff on the extensive community engagement and outreach they have undertaken throughout this process. As an organization made up of community members, we recognize the importance of actively engaging with our fellow citizens.

We encourage this philosophy of citizen engagement as the city refers to



## 2040 Comprehensive Plan

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the Comprehensive Plan to 2040 and beyond. As it was done in the creation of the document, we hope, too, it will continue in the implementation, calling for robust stakeholder involvement and identifying the importance of social capital while upholding the Core Values throughout all the Focus Areas and Topic Chapters.

Sincerely,

Shirley Erstad  
Executive Director

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#### Rick Varco

inside Ward 3

January 10, 2019, 2:47 PM

##### Question 1

Rick Varco

##### Question 2

2265 Youngman Ave. #208, St. Paul, MN 55116

##### Question 3

Saint Paul 2040 Comments

St. Paul should follow the lead of Minneapolis and use the St. Paul 2040 plan to set the stage for a broad comprehensive upzoning of the entire city. This is the easiest way for the city to reduce the cost of housing for all residents, mitigate the danger of climate change, ease racial segregation, expand our tax base, and provide opportunities for high-quality jobs. While the initial draft has many strong hints in this direction, I believe many policy suggestions need to be clarified and made more firm.

General:

I support building the plan around meeting the needs of the expected population growth (344,100 by 2040 p. 6). In general, this goal requires a broad upzoning of all parts of the city. The city must allow the private market the flexibility to add housing when/where it is needed. I strongly agree "the only way to grow is by increasing densities on infill parcels as they become available" (p. 8). But, the only way to make sure that happens is to broadly upzone the city and the plan needs more specific language towards that end.

More importantly the population goal needs to be supplemented in two important ways. First, we need more explicit calculations about exactly how much of the city must be upzoned to meet this target. For example, if all currently single-family only zones were converted to RM1 or T3, how much additional housing could we expect to see? We will not reach the target with a general aim of 'more', we need specific targets. Second, we should not reach for the minimum goal of accommodating the population target. Not only do we want people to live here, we want them to live here

at a price they can easily afford. Our goal should be to allow enough housing not only to accommodate the expected growth, but to allow sufficient excess capacity to ensure that renters and buyers will be able to get a good deal. We should aim for enough extra housing to accommodate the population and provide for a vacancy rate sufficient to keep costs down.

In regards to the themes laid out on page 10, the city should give much more weight objective, universal values like the affordability of housing and access to jobs as compared to subjective, personal values like "sense of community". People without affordable housing options have no choice, while people who object to their "neighborhood's character" can move. In particular, irrational fears about "public safety" should not be allowed to block additional multi-unit housing with diverse residents. Comments on Vision and Core City Values (p. 12)

First, the draft should clarify that these values apply with equal weight to both current and potential future residents. Especially when evaluating increased density, we must consider the benefits to those who will have a chance to live in the new construction. What happens to people if we don't allow enough housing to be built to accommodate them?

Second, while I support the call for more "housing choice" (p.10) the draft needs to clarify that there is no meaningful "housing choice" when the vast majority of the city is zoned for one kind of housing (single family) and is required to provide one kind of transportation infrastructure (parking). Real housing choice requires that we allow multi-family housing on every parcel and that no parcel be required to have a parking minimum.

While I support identifying "health" as a goal, I worry this may reflect old myths about the dangers of taller buildings. The draft should explicitly recognize that dense walkable cities are inherently healthier both individually and collectively than single-family zoning. There are no health advantages to single family neighborhoods.

While, I support "Growth and Prosperity through Density", the draft should delete the references to "well-designed" and "neighborhood context". These are unnecessary qualifiers that will prevent construction of needed housing. They reflect personal aesthetic views and are not a proper subject of public policy.

Land Use

LU-7 is too vague. The city should broadly upzone and allow multi-family housing without parking minimums throughout the city.

Delete LU-11. Preserving "views" is not a valid public goal and can only be used to block needed density.

In LU-13, change "reduce parking minimums" to "eliminate". Parking minimums add to housing costs and force all of us to subsidize car owners. Those who want and need parking should pay for it and those without cars or satisfied with on-street parking shouldn't have to pay. LU-16 is acceptable as long as it does not become a de facto height limit. Delete LU-28. There is no need to ensure 'gradual transitions'.

Transitions in building height whether gradual or radical harm no one and can only be used to block needed density.

Neighborhood Nodes:

The draft should clarify that Neighborhood Nodes will have, not just "increased" (LU-29) but the maximum allowable density under the St. Paul code. Ideally, all residential areas in each Neighborhood Node should

## 2040 Comprehensive Plan

### 2040 Comprehensive Plan Public Feedback

be upzoned to the maximum residential zoning (RM3 or T4). At minimum, the Neighborhood Node designation should provide for the upzoning of every parcel in the area.

The draft should add more node locations in the HighlandMac/Summit Hill areas. We need to provide more housing in the most desirable and expensive areas of the city.

Just as the draft places nodes all along University Ave and the Light Rail line, it should do the same for all of West 7th and the Riverview Corridor and for the route of the A Line BRT. If we prevent people from living along these expensive public investments, we diminish their utility and waste tax payer dollars. Furthermore, the plan should stipulate that the routes of any future BRT will be automatically upgraded to Neighborhood Node status.

Urban Neighborhood:

LU-33 Strengthen "encourage" to "allow by right". There is no reason for the city to block this development.

LU-50 College neighborhoods must be required to upzone to provide sufficient housing for students. All campus adjacent land should be designated as Neighborhood Nodes.

Transportation:

Add a new policy to eliminate Permit Only Parking or at least charge a market rate for neighborhood permit holders. There is no reason to give away the use of public land at below market rates. Every person has an equal right to every public parking spot. People who want to reserve a spot should pay the going price for the privilege.

Housing:

It is disingenuous to say that "the City does not have full control of housing development" (p. 110). In fact, the City has banned everything but single family residential housing in 80-90% of the city. It has done so to exclude people of color and low-wage workers. The draft should recognize this history and explicitly call on the city to reverse course. Instead, the City should adopt a policy of allowing abundant and affordable housing. Similarly, it is not true that the city has a "decades-old commitment to an all-incomes housing strategy" (p. 110). Instead, the city has a policy to restrict the supply of housing to prevent low-income and people of color from building more affordable multi-family housing in much of the city.

Delete H-7. This does not need to be a city priority. If people overcrowd a unit it is probably better than their other alternatives, such as the street. Overcrowding should be solved by allowing additional construction.

H-15-17 are too vague and unspecific. They should require broad upzoning without parking minimums

H-47: Delete "compatible with the pattern and scale of the neighborhood". This is not a valid public policy goal. Cities can't grow and develop, if we restrict them to existing patterns.

H-48: I strongly support this essential recommendation. The draft should clarify that this applies to everything labeled "Urban Neighborhood" on page 43. In addition, this should apply to each individual parcel in those areas. Finally, "small-scale multi-family" should be more clearly defined to include, at minimum, 3 story, 6-plex structures.

Heritage and Cultural:

The world belongs to the living. These areas must be dramatically scaled back. There should be a fixed and limited number of building and parcels so designated. Adding one site should require the removal of another.

### Bob Morrison

outside Saint Paul

January 10, 2019, 3:00 PM

#### Question 1

Bob Morrison

#### Question 2

1649 Summit Avenue

#### Question 3

Once approved, what process has been established to monitor and measure whether or not assumptions made remain realistic and relevant, and for identifying and rectifying any unintended consequences as a result of actions taken as the City implements the 2040 Comprehensive Plan?

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### Tyler Blackmon

inside Ward 2

January 10, 2019, 3:05 PM

#### Question 1

No response

#### Question 2

No response

#### Question 3

St. Paul should adopt a 2040 plan that provides abundant and affordable housing for our growing population. We should follow the Minneapolis 2040 plan and relax government restrictions on multi-family housing throughout the city and eliminate parking requirements. Legalizing the option of dense multi-family housing throughout the city allows us to address the danger of global climate change, help reduce racial segregation, and promote good construction jobs in the city.

Also there's a huge sidewalk gap along West 7th just past the Montreal/Lexington/West 7th intersection that makes pedestrian safety pretty abysmal. Please fix it.

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### Tawanna Black

inside Ward 2

January 10, 2019, 3:17 PM

# 2040 Comprehensive Plan

## 2040 Comprehensive Plan Public Feedback

### Question 1

Tawanna A. Black

### Question 2

370 Wabasha Avenue N. Suite 900 Saint Paul, MN

### Question 3

The Center for Economic Inclusion (the Center) appreciates the opportunity to comment on the draft City of Saint Paul 2040 Comprehensive Plan, Saint Paul for All. As an organization dedicated exclusively to advancing inclusive growth to achieve regional prosperity, the Center has urged all cities in the metropolitan area to advance a racially equitable economy through their comprehensive plans. To maximize impact, the Center is submitting specific comments on the draft plans of the five metro area cities with the highest shares of people of color.

The Center advocates that all municipalities incorporate the following elements into their comprehensive plans:

1. A goal to develop a racially equitable economy;
2. Data analysis, consistently disaggregated by race, to identify racial disparities in access to affordable housing, transit, living wage jobs and economic development;
3. Policies and strategies specifically designed to close the identified racial disparities;
4. A commitment to evaluating the impact of these policies and strategies on people of color, and to adapting those policies and strategies based on that evaluation.

We believe that we build inclusive economies by working at the intersection of human capital, economic development, transit and access, through the lens of race, place and income, not by addressing them as independent focus areas. And, a plan is only as successful as the sustained, intentional investment of human, intellectual, social, and financial capital that is invested in letter and spirit. To that end, the Center stands ready to partner with policy makers to incorporate these elements into draft comprehensive plans and, more generally, into the way public agencies do business.

#### SUMMARY COMMENTS

##### Goal

Saint Paul for All includes "equity" in three of its foundational statements:

1. As one of the eight "challenges and opportunities for the future." Specifically, the plan states "how we grow, develop and invest over the

next 20 years must be done in a way that reduces disparities in jobs, income, housing cost burden, education and home ownership."

2. "Livability, equity and sustainability" was one of nine themes identified through the community engagement process.

3. "Equity and Opportunity" is one of ten core values that inform the vision. "We are a city where opportunities in education, employment, housing, health and safety are equitably distributed and not determined by race, gender identify, sexual orientation or age; we are a city that creates opportunities for all residents to achieve their highest potential."

It is significant that the City of Saint Paul has recognized equity as a challenge/opportunity, a theme, and a core value in the draft plan. The Center encourages the comprehensive plan to go further by including a specific goal for creating a more racially equitable economy. It is important to have a goal because it helps to focus policies, drive implementation and structure accountability through evaluation. One of the places the draft comprehensive plan could include such a goal is among the other goals in the Land Use chapter on page 28. Additionally, the policies in that chapter that support the economic inclusion goal could be organized under it (as is done in other chapters).

##### Data

Saint Paul for All contains some disaggregation of data by race, especially in the housing chapter. Also, the mapping of the "Area of Concentrated Poverty with 50% or More of People of Color" (ACP50) in relation to other data visually demonstrates how race, income, and geography coincide with poverty, homeownership, and education.

The Center encourages the City to expand these analyses by:

- Providing more disaggregated data on economic inclusion, including: labor force participation, unemployment, educational attainment and others.
- Disaggregating the data by racial groups, rather than by People of Color versus whites.
- Undertaking more detailed analysis when ACP50s is used as a planning and investment tool.
- Grounding the plan's policies in data analysis.

##### Policies

Saint Paul for All contains many policies that seek to advance racial equity and economic inclusion. The Center encourages the City to build upon this approach by:

- Applying equity analyses and policies more evenly and systematically throughout the plan.
- Providing more specificity on how racial equity applies to certain policy areas.
- Connecting equity-related policies to goals, actions, resources and measures.

To more effectively bridge vision and execution, the Center suggests that the City provide more detail in the implementation chapter of the plan. In particular, the land use implementation section would be strengthened by:

- Connecting each implementation action to the comprehensive plan policies and goals it advances.

## 2040 Comprehensive Plan

### 2040 Comprehensive Plan Public Feedback

•Identifying potential indicators for measuring the success of each action.

#### Evaluation

Saint Paul for All includes several specific policies that include the use of an equity lens. The Center encourages the City to broaden the application of an equity lens to the implementation and evaluation of all city programs and decisions.

#### ADDITIONAL COMMENTS

##### Data

The Center supports the disaggregation of data by race in the plan. For example, in the Introduction (page 7), the plan outlines some of the disparities based on race:

“Saint Paul residents are experiencing significant gaps in education, income, employment and home ownership. In 2014, 52% of whites age 25 and older had a bachelor’s degree or higher, while only 19% of people of color were in this category. While labor participation is nearly equal between whites and people of color (72% and 68% respectively), the per capita income for whites in 2014 was three times that of people of color (\$39,344 vs \$13,856). In 2014, there was a 33% gap in homeownership between white residents and people of color (61% vs 28%, respectively).”

The plan continues by identifying the “Area of Concentrated Poverty with 50% or More of People of Color” (ACP50) in Saint Paul. Furthermore, policy LU-3 states that the City will “prioritize public investments relative to areas of concentrated poverty.” The plan notes that Saint Paul’s ACP50 “shows a concentration of the highest percentages by block group of carless households, families living in poverty, non-English-speaking households, severely cost-burdened households, and populations 25 years and older with no bachelor’s degree. The ACP50 area also exhibits the lowest high school graduation rates in Saint Paul.”

The Center supports this disaggregation of data by race, and the geographic analysis based on ACP50s. By overlaying the ACP50 map on all the data in Appendix A, one can clearly see how race, income and geography coincide with poverty, homeownership, and education. This visualization is effective in demonstrating the relationships between these factors.

However, as a planning and investment tool, ACP50s have their limitations. Originally conceived by the Metropolitan Council for region-level analysis, ACPs and ACP50s can mask a great deal of nuance when applied to the neighborhood and city levels. For one, ACP50s take attention away from disadvantaged residents in other parts of the city. Also, ACP50s are not monolithic and contain high-wealth communities and individuals within them. Finally, because the ACP50 covers a large portion of Saint Paul, it is not especially helpful in focusing resources. The Center encourages the City to build upon the ACP50 analysis with a more in-depth analysis that disaggregates data by race city-wide (and by smaller geography, as needed). While the Introduction cites the homeownership gap between whites and People of Color (POC), the Center encourages the City to break down the broad category of POC into more specific racial categories, as the data allows. One place to start would be to disaggregate the data mapped in Appendix A to the

Introduction by race, such as poverty and homeownership (similar to how the housing chapter breaks down housing cost burden and homelessness by race).

The data analysis in the housing chapter of the plan is detailed and comprehensive. The Center encourages the City to provide additional data on the current state of economic inclusion in Saint Paul in the plan, and to disaggregate this data by race. Example data sets for this analysis might include: labor force participation, unemployment, mapping of jobs in relation to communities of color, mapping of jobs in relation to transit accessibility, median household income, poverty level, high school graduation (and other educational attainment) and business ownership. In addition to disaggregating the data in the plan, the Center encourages the City to further ground the plan’s policies in data. For example, policy LU-4 seeks to minimize displacement in redevelopment areas with high-frequency transit. What specific areas are these, and how do we know? What measures are used to identify displacement risk, and what do the data tell us about those areas?

##### Policies

Saint Paul for All weaves the theme of social and racial equity throughout much of the plan. The Center encourages the City to strengthen this approach by:

- Applying equity analyses and policies more evenly and systematically throughout the plan.
- Providing more specificity on how racial equity applies to certain policy areas.
- Connecting equity-related policies to goals, actions, resources and measures.

Policy WR-9 provides a positive example of this approach: “Apply an equity lens to policy and funding decisions relating to providing assistance to or coordinating with owners to improve private water connections to the public distribution system.” This policy effectively states how an equity lens will be applied to an aspect of water resources. Other areas of the plan, most notably the housing chapter, also provide a high level of detail about how the policies will foster equity. The Center encourages the City to include a similar level of specificity on how an equity lens will be applied to other areas of economic inclusion.

For example, Policy LU-6 states “Foster equitable and sustainable economic growth by:

1. Facilitating business creation, attraction, retention and expansion;
2. Supporting family-sustaining jobs and enhancing workers’ skills to excel at those jobs;
3. Growing Saint Paul’s tax base in order to maintain and expand City services, amenities and infrastructure;
4. Proactively directing new development to high-priority geographies, such as Neighborhood Nodes, ACP50 Areas and Opportunity Sites;
5. Encouraging cultural and arts-based businesses and business districts, such as Little Mekong, Little Africa, Rondo and the Creative Enterprise Zone;
6. Supporting business, real estate and financial models that keep more money locally, such as locally-owned businesses, local-prioritized employment, employee-owned businesses and commercial land trusts;
7. Building and expanding neighborhood economic and cultural assets through the development of the local micro-economies of our

## 2040 Comprehensive Plan

### 2040 Comprehensive Plan Public Feedback

Neighborhood Nodes;

8. Enhancing vibrant downtown neighborhoods and connecting them to the Mississippi River;

9. Developing programs and funding sources for site acquisition and parcel assembly; and

10. Integrating Saint Paul's historic resources into neighborhood-based economic development strategies."

How will these actions foster equitable economic growth? How will the City apply an equity lens to this policy? Which of the seven goals in the land use chapter does this policy support? Which of these actions will be focused on communities of color? Which ones will be applied evenly, city-wide? The Center encourages the City to expand upon this policy with a more detailed discussion of how it will advance equity and economic inclusion.

Policy PR-12 states "Ensure Parks and Recreation staff reflect the demographic diversity of a dynamic city to better inform decisions regarding operations and facilities." The Center applauds this policy and agrees that greater diversity can create more inclusive decisions. But why limit this policy to Parks and Recreation staff rather than all city departments? Also, why not seek to match staff diversity to that of the City of Saint Paul (rather than "a dynamic city")? A revised policy might read: "Ensure all City of Saint Paul staff reflect the demographic diversity of the city to better inform decisions."

Policy H-20 states "Collaborate to reduce racial disparities in homeownership that could be attributed to unequal access to fair lending or intentional steering to specific neighborhoods." The Center applauds the City for this policy to reduce racial disparities in homeownership. However, it is not clear why it limits City action to disparities that are based on unequal access to lending or intentional steering to specific neighborhoods. Are there data to show that these are the primary drivers of the homeownership gap? What role does the difference in generational wealth play?

Policy H-56 states "Improve the stability and health of communities of concentrated disadvantage by implementing place-based investments, such as public infrastructure, improvements and maintenance." The Center encourages the City to clarify this policy. What does "concentrated disadvantage" refer to? How does it relate to the ACP50? If H-56 is referring to a similar geographic area, how does this policy differ from LU-3? The Center encourages the city to clarify the relationship between these policies.

#### Evaluation and Implementation

Saint Paul for All includes several commitments to use an equity lens in decision-making and evaluation, including:

- Apply an equity lens to policy and funding decisions relating to providing assistance to or coordinating with owners to improve private water connections to the public distribution system" (WR-9).
- Consider a process to further evaluate and monitor equitable distribution of community amenities." (Item 11 in the Land Use Chapter implementation table).

The Center encourages the City to broaden the application of an equity lens to the implementation and evaluation of all city programs and

decisions.

The Center also encourages the City to provide more detail in the implementation section of the plan, especially regarding the policies that seek to advance economic inclusion. The introduction to the implementation chapter includes the following among ten "general implementation" actions: "implement and regularly update the City's Racial Equity Plan to realize and measure equity-related goals and policies." Also, the land use chapter implementation table includes "Implement Economic Development Strategy." How do the racial equity plan and economic development strategy work together to implement comprehensive plan policies? Where do their goals, strategies and measures overlap and diverge? Given the reality of limited resources, what among these plans and strategies will be prioritized in the near term?

To clarify these questions, the Center suggests that the City include a more detailed implementation matrix in the plan's land use section. Currently, it includes a list of actions, their timelines (short-, medium- or long-term) and a list of potential funding sources. The Center encourages the City to enhance this section by:

- Connecting each implementation action to the comprehensive plan policies and goals it advances.
- Identifying potential indicators for measuring the success of each action.

By providing a more detailed implementation section, the City can better articulate how the equity goals and policies in the plan will advance measurable changes in toward economic inclusion in Saint Paul.

#### About the Center for Economic Inclusion

The Center for Economic Inclusion is the nation's first organization dedicated exclusively to advancing inclusive growth to achieve regional prosperity. By elevating data-driven promising practices, advocating for inclusive policies, coordinating cross-sector, community-driven development, and piloting strategies that truly close racial and economic gaps, we partner across communities and sectors to shape a Minneapolis-Saint Paul regional economy that works for everyone. We can unlock our region's potential by connecting people, jobs, and opportunity through housing and transit, entrepreneurship and investment, and fair wages and talent development. To do so, the Center connects communities excluded by Race, Place, and Income with cross-sector leaders to cooperatively design an inclusive and exciting new blueprint for growth that leverages both market forces and our region's diversity.

We understand the role you play in shaping local and regional prosperity and an excellent quality of life. We're eager to partner with you to unlock our region's full potential and create a region that thrives because of our diversity not in spite of it. Together, we can create an economy that works for everyone.

Thank you for your leadership and your consideration,



## 2040 Comprehensive Plan

### 2040 Comprehensive Plan Public Feedback

Tawanna A. Black  
Founder & CEO, Center for Economic Inclusion

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#### Name not available

January 10, 2019, 3:20 PM

##### Question 1

Amy Gundermann

##### Question 2

1216 Selby Avenue

##### Question 3

I have submitted a letter on behalf of the Lexington-Hamline Community Council to planners Josh Williams and Anton Jerve via email.

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#### David Sullivan-Nightengale

inside Ward 5

January 10, 2019, 4:04 PM

##### Question 1

David Sullivan-Nightengale

##### Question 2

1132 Norton Street, St. Paul, MN 55117

##### Question 3

Page 8 - Autonomous vehicles. We cannot allow our pedestrians, cyclists, and other users of our streets to be test subjects for autonomous vehicle manufacturers. The majority of autonomous vehicles being tested are actually heavier and larger than existing vehicles due to the need to carry multiple additional sensors. Very few are small electric vehicles that are not crashworthy. There is currently no consensus standard for the safety certification of these vehicles that either NHTSA or the State of Minnesota requires for safety on our roads. The majority of these vehicles are tested in dry environments where snow rarely accumulates today. Don't allow these on our busy streets until the industry can make a safety case. As someone who has worked within this industry specifically in the area of system safety, it is a long way off from doing that.

Rail safety is not mentioned in the plan either to improve pedestrian

safety in and around light rail or prevention of freight rail vs pedestrian mishaps. We've had many fatalities and injuries in St. Paul both with pedestrians vs rail and automobiles versus rail.

No mention is made of the safety of hazardous materials leak potential from high hazardous freight trains that are stopped for extended period of tie in our neighborhoods and flowing through our neighborhoods.

Policy LU-54 No new construction should be allowed near the routes of high hazardous freight trains in St. Paul as it will be impossible to prevent fatalities in a derailment in close proximity to the tracks hauling hazardous materials. While many rail accidents occur at intermodal facilities, these are of lower severity due to the slow speeds at these facilities. The most severe occur between facilities where the potential for derailment of multiple cars in urban areas near homes and businesses exist. The at-grade crossing at Como with the BNSF should be part of the plan for long-term mitigation through grade separation. Additional measures to prevent pedestrians from getting injured by walking on the freight rail tracks need to be pursued.

The FRA needs to be responsive at getting the railroads to fix bridges which continue to jettison debris into the river and onto the roadways posing a hazard to other modes of transit.

No mention was made about our aging pipeline systems that need to be replaced. Some of these transport hazardous materials past our homes and businesses.

Page 55 safety and accessibility for all users.

We need the city to ensure shoveling of sidewalks at intersections after each and every snowfall. There are entire blocks that are inaccessible to wheelchair users even after 72 hours after snowfall events.

Map T-17: No new facilities for rendering animal products or composting facilities should be near the St. Paul Downtown Airport as this increases the risk of bird strikes with aircraft. This could affect the airport operating certificate. Please include the reference to the Airport Operations Plan. Regarding numerous drone sightings at the St. Paul Downtown Airport, please consider including signage for parks located within the five nautical mile Class D Airspace over St. Paul for coordination of airspace. Be aware that a heliport also exists for Regions Hospital. In parks where people can fly drones, please consider signage to not fly over people.

Page 80: Dale Street Bridge over I-94 is not a potential project - it is currently a planned project.

Please add sidewalks on the South Side of Larpenteur Avenue as a future project.

Policy LU-56 Prior to expanding river terminals, and EIS should be required to consider the environmental mishap potential. Recreational traffic needs to have a reasonable distance from these facilities.

## 2040 Comprehensive Plan

### 2040 Comprehensive Plan Public Feedback

PR-20 page 97: Monitoring of invasive species should be replaced with removal of invasive species. There is no mention of the work that also needs to be done and has already been done on removal of aquatic invasive species that currently threaten the city infrastructure on the Mississippi River. Likewise, a plan to prevent the spread of AIS in what few lakes we have needs to be emphasized.

Water resource management (starting on page 179) must include enforcement of existing ordinances for homeowners and businesses exceeding allowable impermeable surface construction. The city has not taken appropriate action to mitigate runoff in several neighborhoods. As a result of this, several houses have flooded and continue to experience flooding.

Only one reference to response to disasters on page 31. Where's the rest?

While many features of this plan cover housing efficiency, very little is mentioned about home and rental property safety. Lack of carbon monoxide detectors, smoke detectors, and home sprinklers will kill far more people than not having solar panels on individual homes and apartments.

The number of elderly residents who perish due to lack of air conditioning and heating continues to be the number one cause of weather related deaths in St. Paul. Fire fatalities continue to occur in both old a new homes despite having smoke detectors. Homes and electrical infrastructure are not designed or robust enough to handle additional current loading to charge electrical vehicles.

Our above ground electrical utilities continue to be one of the most significant resiliency vulnerabilities from inclement weather causing blackouts lasting days. There is no plan to improve the robustness of our electrical infrastructure to keep it reliable and safe. As a result, St. Paul residents have been without power for several days each year.

We need to make St. Paul a destination location not just for residents but the world. Multi-language signage is not just for English language learners. We want to attract the tourists and international visitors.

Please show us a map where new small businesses are popping up on a map and turnover rates for businesses and housing. The Hill business library should have data we can use on this.

Please show us where startup can relocate or where space for small businesses may be available in the future so we can plan on siting.

### Name not available

January 10, 2019, 4:22 PM

#### Question 1

Lori Brostrom

#### Question 2

710 Summit Avenue Apt. 1

#### Question 3

I have several issues and concerns regarding the 2040 comp plan draft:  
1. The focus on adding density—especially in areas of St. Paul that are already high-density and suffering from the effects already—without any data or evidence regarding the impacts across all areas of the plan document, is misguided and irresponsible. I know for a fact that data has not been collected in the high-density part of the city where I live, nor in many others, and proceeding without that information is manifestly not in the best interests of residents.

a. There is clearly no evidence-based information about, nor acknowledge of, the impact on aging infrastructure. As a 20+ year resident/homeowner in Summit Hill, where roughly half of the housing is now multi-family, we are struggling with those impacts already, including high traffic and the attendant pedestrian and vehicular safety issues, increasingly difficult parking on residential streets, streets bearing more traffic without corresponding amounts of maintenance, even lower water pressure. None of this will get any better as more residents are shoe-horned into the district if the City moves forward with this plan.

b. Many of us living in St. Paul do so because of the unique character of our neighborhoods, whether it be Summit Hill, Mac-Groveland, Highland, Como, St. Anthony Park, Dayton's Bluff, or any of the other well-established areas. The manner in which the City has allowed/encouraged added density so far, e.g., the large developments along Snelling, the plans for the Ford Plant site, the approved up-zoning of Marshall Avenue—has not been done in a manner that respects the character of the surrounding neighborhoods nor the investments that residents/homeowners have made in maintaining and improving their communities. The lip service that is paid in this plan to "context" is inadequate in ensuring that neighborhood character is truly preserved, especially with regard to many of the suggested changes to the zoning code.

c. We truly are a city of communities currently—something which homeowners and renters alike demonstrably value. Having lived in Manhattan and San Francisco, I know from personal experience that high rises do not encourage a sense of community. Furthermore, as evidenced by the continuing robust growth of the suburbs around Minneapolis and St. Paul, people clearly value the privacy and green space afforded to them by single-family housing and lower-density development vs. high rises. Data consistently shows that millennials, as they marry and start having families, do not want to live in high rises.

d. The assumptions around the use of mass transit and movement away

## 2040 Comprehensive Plan

### 2040 Comprehensive Plan Public Feedback

from cars to justify density-intense building along transit lanes are similarly not based on evidence or reality. Even with light rail, mass transit use in the Twin Cities is not growing commensurate with the population and bus ridership is actually down. In large part this is a function of a transit system that is at best a patchwork quilt and does not allow anyone to easily get from point A to point B anywhere in the Twin Cities, whether for work, leisure or day-to-day needs like shopping and for many locations it is impossible. Absent an enormous—and enormously unlikely—infusion of Federal money, this will not change for decades, if at all. People living in St. Paul will likely be working outside of St. Paul and the vast majority will drive to their jobs. They will also need cars to do their grocery shopping, visit friends, go on trips—and they're going to need off-street parking.

2. Similarly, the section on transportation is based on wishes and hopes, not reality. As noted above, St. Paul is not currently supporting and maintaining its current transportation infrastructure. Driving down Summit Avenue—a major arterial—is a teeth- and axle-rattling nightmare already, and this is true no matter where in the city one lives. It's also embarrassing, as visitors routinely comment on the bad condition of our roads. This should be the first priority. While I respect the desire to make St. Paul more pedestrian- and bike-friendly, it should not be at the expense of what is for the vast majority of residents their primary mode of transportation, which is vehicular. I live on a major bike route and the car to bike ratio is still incontestably high—and this being MN, from November to April, bike use is confined to a very small number of riders. If this section of the plan was evidence-based, the conclusions and priorities would be very different.

3. Affordable housing is clearly a pressing need. However, as with the transportation section, there is little in this plan other than wishes and hopes that will accomplish this unless the creation of affordable housing is tied explicitly to the ability of for-profit developers to build high-density projects. Furthermore, there is nothing that acknowledges the robust role that nonprofits such as Aeon, CommonBond, MN Housing Partnership and others can and should be playing in this area. They are more knowledgeable, efficient and adept at leveraging scarce public money to accomplish these goals because they're not trying to make a profit. Moreover, many also address the psycho-social issues that go hand-in-hand with poverty and is clearly a need which the plan's maps of poverty zones reflecting ACP50 data demonstrate.

4. Heritage Preservation speaks to so many things—our sense of place and home, our sense of and pride in community, and an acknowledgement that St. Paul was largely built by immigrants who came here to find and craft a better life for themselves and their families. But, it also to bricks and mortar issues that appear to be given short shrift in this plan. Our historic buildings—public AND private—not only speak to the heritage of many, but also comprise the majority of the buildings in St. Paul. Indeed, as noted in the housing section of the plan, almost 60% of the single-family and low-density multi-family housing in the city was built prior to 1930, and the charm and character they provide to neighborhoods—not to mention stability—are valued by residents and visitors alike, and many historic neighborhoods contribute disproportionately to the property tax base upon which the city depends. This section needs to go far beyond the vague goals it currently

contains—compared to the more robust 2010 Comprehensive Plan's Historic Preservation section—to be much more explicit in terms of what it is going to do to preserve this part of our collective heritage and acknowledge the value that it brings beyond the emotional:

a. In many neighborhoods, it is naturally-occurring affordable housing (NOAH), whether it is a single-family or multi-family building. They not only reflect our heritage, but they are, more often than not, solidly built. Affordable housing developers have noted recently in the local business press that it costs an average of \$75,000 to rehab an existing unit of housing vs. \$225,000-250,000 to build new. Just in terms of meeting the need for affordable housing, historic preservation should be a priority for St. Paul.

b. Preserving historic buildings is also environmentally sustainable. Tearing down older buildings and replacing them with more expensive new buildings is creates a net environmental cost even when the new building is more energy efficient. A 2012 study by the National Trust for Historic Preservation's sustainability think tank Preservation Green Lab found that even without investing in making an existing building energy-efficient, it is still more environmentally sustainable to keep it rather than to replace it: an article related to the study says, "Retrofit an existing building to make it 30 percent more efficient, the study found, and it will essentially always remain a better bet for the environment than a new building built tomorrow with the same efficiencies. Take that new, more efficient building, though, and compare its life cycle to an average existing structure with no retrofitting, and it could still take up to 80 years for the new one to make up for the environmental impact of its initial construction." St. Paul has many examples of adaptive reuse of historic buildings which prove this point.

c. Preservation and historic districts protect and increase property values, as several studies have shown. This is a significant economic benefit to the city. Over and above that, added economic benefits accrue by their attractiveness to visitors, resulting in higher tourism-related revenue to local businesses. For example, Visit St. Paul has said that the Historic Hill District is a major draw for organizations considering St. Paul for meetings and conventions.

Thus, it is important that this section not only acknowledge the evidence-based positive impacts of all aspects of heritage preservation—including historic preservation, specifically—but also to be more granular in what, exactly, will be done to meet the current vaguely-stated goals laid out.

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### KaYing Yang

inside Ward 1

January 10, 2019, 4:56 PM

#### Question 1

KaYing Yang

#### Question 2

941 Lafond Ave., Suite 207



## 2040 Comprehensive Plan

### 2040 Comprehensive Plan Public Feedback

#### Question 3

Summary of the Coalition of Asian American Leadership's Recommendations  
2040 Comprehensive Plan, St. Paul, MN

We offer these recommendations to help St. Paul be more effective in reaching and including Asian American residents:

Improve and disaggregate data and when data is not available commit to collecting qualitative data. Being able to see and use this richer data will help ensure proposals are more responsive and resources are equitably invested in each of our communities. This is particularly important for programs related to small business development and workforce development.

Cultural corridors and neighborhood planning. Little Mekong in St. Paul is a good example of a community led cultural district that would benefit from investment from the city. Coordinate the development of housing, businesses, and infrastructure in geographic areas where a district-wide approach has the greatest opportunity for achieving goals. We recommend that municipalities evaluate land and zoning use to respond to social, economic, market, and environmental contexts for the Asian community. Also prioritize public investments to areas of concentrated poverty as defined by the Metropolitan Council.

Housing and homelessness. Share data from fair housing tests related to Asian prospective renters. Expand homeownership counseling programs that work with Asian prospective homeowners. Continue interdepartmental coordination and implementation of the recommendations of the Analysis of Impediments report and other fair housing issues. Support alternative household types such as co-housing, intentional communities or other shared-living models that allow residents to age in community.

Small business development. Support the development and growth of small businesses by creating outreach programs to educate Asian business owners about city financing and technical assistance programs. In particular food and agriculture creative sector businesses should be encouraged and resourced to succeed. Along with access to capital, access to resources such as commercial kitchens and urban agriculture programs are huge barriers for Asian entrepreneurs.

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#### Name not available

January 10, 2019, 6:14 PM

#### Question 1

No response

#### Question 2

No response

#### Question 3

No response

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#### Chelsea DeArmond

inside Ward 7

January 10, 2019, 6:21 PM

#### Question 1

Chelsea DeArmond

#### Question 2

667 North Street, St. Paul, MN 55106

#### Question 3

My main concerns for 2040 are how can St. Paul communities reduce our carbon footprint and increase our resilience as our climate destabilizes? I was encouraged by policies that increase urban density, develop neighborhood nodes, encourage accessible public transit, prioritize walking and biking, and improve access to parks and green space. Even though there is a policy (T-4) to develop electric vehicle infrastructure, there is no policy to transition the city's fleet to electric vehicles. I want the city to take a leadership role in the transition to carbon-free energy and transportation that we all need to make. The next 20 years are a critical time for our city and our planet.

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#### Andy Singer

inside Ward 3

January 10, 2019, 7:27 PM

#### Question 1

Andrew Singer

#### Question 2

2103 Berkeley Avenue, Saint Paul, MN 55105

#### Question 3

I wrote an entire post for streets.mn, focused mostly on the Transportation Chapter. It contains all my suggestions--  
<https://streets.mn/2018/09/04/the-saint-paul-2040-comprehensive-plan/>

## 2040 Comprehensive Plan

### 2040 Comprehensive Plan Public Feedback

#### Jean Comstock

inside Ward 7

January 10, 2019, 10:12 PM

##### Question 1

Jean Comstock

##### Question 2

729 6 St. E, St. Paul, MN 55106

##### Question 3

Compliments on Policy T-4: Significantly reduce carbon emissions from motor vehicles by developing infrastructure that supports vehicle electrification. However, I would also like to see plans and a timeline for electrification of the St. Paul City's fleet (including city and police cars). If this is not the right document to address this, could you please tell me where it might be (for example, the next climate action plan)? Thank you. The plan seems good.

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#### Luke Hanson

inside Ward 3

January 10, 2019, 10:31 PM

##### Question 1

Luke Hanson

##### Question 2

1880 Grand Avenue, Apt. #204

##### Question 3

St. Paul should adopt a 2040 plan that provides abundant and affordable housing for our growing population. We should follow the Minneapolis 2040 plan and relax government restrictions on multi-family housing throughout the city and eliminate parking requirements. Legalizing the option of dense multi-family housing throughout the city has many benefits. First, it will promote good construction jobs in the city, and give homeowners opportunities to improve their economic well-being by converting their houses into multiple dwelling units. Higher population densities will make it financially practical to add more numerous and frequent transit options, making it more practical for St. Paulites to live without a car. Higher population density will enable more local businesses to flourish. More people walking and taking transit will mean better public health, a stronger sense of community, and the greater public safety that results from more "eyes on the street." A more population-dense St. Paul will be more environmentally sustainable, and

more economically resilient to the effects of climate change. A St. Paul with more affordable housing options throughout the city will be less racially and socioeconomically segregated. A St. Paul with more housing options will provide seniors with more options to age in place, and low-wage workers with close proximity to high-wage jobs in the city. In order to realize this vision, the St. Paul 2040 Comp Plan needs sharper teeth.

For example: Policy H-48 should be strengthened, perhaps with one simple word: "Expand permitted housing types in \*all\* Urban Neighborhoods [that is, every neighborhood in St. Paul without exception] ... to include duplexes, triplexes, town homes, small-scale multifamily and accessory dwelling units."

LU-7 is very vague. The city should broadly upzone and allow multi-family housing without parking minimum throughout the city.

LU-13 should "eliminate" parking minimums rather than "reduce" them. Parking minimums inherently favor automobiles as a mode of transportation, burdening business owners and housing developers with additional costs that are passed to consumers and residents, and undermining the possibility of St. Paul being a transit-friendly, walkable community.

LU-28 should be deleted. Transitions in building height harm no one, whether they are gradual or sudden. This policy would only be used to block development which is deemed too dense.

LU-33 should not just "encourage" medium-density housing, but "allow by right."

LU-50 This policy is vague. College neighborhoods should be upzoned to provide sufficient rental housing for students in the immediate vicinity. The current Student Housing Neighborhood Impact Overlay District should be eliminated.

Policies H-15, H-16, and H-17 are good, but they should be strengthened to require broad upzoning without parking minimums.

In H-47, the language "compatible with the pattern and scale of the neighborhood" should be deleted. This goal should never supersede the priorities of adding dense, affordable housing, and this language can only serve to block needed density.

I strongly support H-48.

Other general notes:

The plan should do more to clarify and specify how much density would be allowed in Neighborhood Nodes, and allow significant increases over the existing limits. Stations along current and planned transit lines (the Riverview Corridor, the A Line BRT, and future BRT Lines) should automatically be upgraded to Neighborhood Nodes.

More Neighborhood Nodes should be added throughout the city, particularly in Highland, Macalaster-Groveland, and Summit Hill, where they are conspicuously few in the current draft. Examples: Grand-Cleveland, Grand-Snelling, Grand-Hamline, Grand-Lexington, St. Clair-Fairview, St. Clair-Snelling, St. Clair-Hamline, St. Clair-Lexington, Randolph-Cleveland, Randolph-Fairview, Randolph-Hamline, Randolph-Lex, Snelling-Ford, Hamline-Ford, Marshall-Fairview, Marshall-Snelling, Selby-Fairview, Selby-Victoria, Hamline-Thomas, Fairview-Minnehaha, Maryland-Rice, Arlington-Rice.

In regards to Housing, p. 110: It is disingenuous to say that "the City does not have full control of housing development." The city has banned

## 2040 Comprehensive Plan

### 2040 Comprehensive Plan Public Feedback

everything but single family residential housing in 90% of the entire city, at the expense of people of color and low-wage workers. This document should recognize this history and explicitly call on the city to reverse course; and it should adopt a policy of allowing and encouraging abundant and affordable housing.

Universal values like affordability of housing and access to jobs should always trump subjective, personal values like a "sense of community."

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#### Eric Saathoff

inside Ward 6

January 10, 2019, 11:28 PM

##### Question 1

Eric Saathoff

##### Question 2

691 Wells St

##### Question 3

I hope the city takes this opportunity to eliminate parking minimums city-wide. There is no reason that the city should be enforcing a car-centric transportation system. Residents and business owners should decide what amount of parking they need and supply it themselves. This is an easy way to make housing more affordable and make it easier to do business in our city.

I also hope the city will take this opportunity to follow the footsteps of Minneapolis in upzoning either the entire city or vast portions of it. There is no way to reduce the cost of housing by restricting the supply. The city of St. Paul has an enormous amount of single family zoned neighborhoods. We need to upzone to allow more supply of housing. If this is to be done in nodes, there should be more nodes that follow transit corridors (bus lines) and existing commercial corridors.

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#### Al Davison

inside Ward 2

January 10, 2019, 11:32 PM

##### Question 1

Al Davison

##### Question 2

186 Summit Ave

##### Question 3

I mostly support the current proposal for the city's 2040 comprehensive plan. The city is growing and the city needs to prepare and address the issues that current and future residents will face in our community for years to come. The current plan makes a lot of great steps forward, though yet some of the policy plans seem too restrictive.

Regarding land use, more mixed-use and medium-density development can help strengthen our neighborhoods and it will help with the current housing shortage. Higher-density development can help further strengthen our downtown, and other places such as around Snelling and University. Saint Paul has the ability to support more residents and through reforming zoning regulations, the city could allow better opportunities for more housing choices across the city. The city can support more multi-family housing without affecting the city's large stock of single-family homes. Sites such as the Ford Site can help preserve the existing housing stock within Highland Park, while still adding more housing units of various types (from single-family to multi-unit apartments/condos). It is good that the city acknowledges the importance of infill development in the 2040 plan, but having a strong emphasis on strict height limits and other regulations has affected development from occurring in the city in the past; zoning reform of a large scale must be done in order to truly invest in future developments across the city, regardless if it is located in a designated "neighborhood node" or not.

The city's residents face inequality based off racial and socioeconomic factors and housing has a major impact on people's lives. The city needs more housing, especially housing that low and middle-income residents can afford. Neighborhoods such as Rondo and the North End will thrive more when residents are able to have better housing choices. The current exclusionary zoning regulations that the city has restricts housing into single-family zones in many areas, which has contributed to the current housing shortage and income inequality that residents face. Duplexes, triplexes, and fourplexes easily integrate into areas that primarily contain single-family housing and they can help reduce housing costs. Accessory dwelling units (ADUs) are another great way to add small-scale housing options within existing lots. I currently live in a sevenplex in what used to be a single-family home, and since that was allowed to happen before existing zoning restrictions – the existing housing stock was preserved, with the benefit of the addition of more affordable housing units to the city's housing stock. I likely wouldn't be living where I am today if the current zoning regulations blocked this house from becoming a sevenplex.

Regarding transportation, removing (or at least reducing) parking minimums (ex: LU-13) can help base an area's actual parking demand off the true market demand rather than inducing parking demand off arbitrary metrics set forth by local government. Minimum parking regulations have caused the unnecessary destruction of buildings for surface parking. Surface parking lots have hurt the city's commercial corridors along Payne, Rice, and University since the mid-20th century. We have limited space in the city, and we have to acknowledge that large surface parking lots tend to negatively impact urban neighborhoods. In

## 2040 Comprehensive Plan

### 2040 Comprehensive Plan Public Feedback

areas with high parking demand, paid parking meters and ramps should be considered since parking is an expensive asset to build and maintain. Designated [handicap] parking for disabled people can remain a priority for where it is needed. While parking in the city can be difficult in some places, there is a limit on the economic feasibility to build/maintain parking by both businesses and the city. We have to be more proactive in parking management, and the city's goals towards promoting shared parking is a good step forward.

Regardless of parking needs, the city needs to improve its multi-modal transportation network. Autonomous vehicles will not be able to replace many trips taken by transit, biking, and walking. Therefore we need to put more of a focus on improving the spaces on roads or streets for all users, regardless of their transportation mode. Both local residents and visitors benefit from better sidewalks, transit, and bike infrastructure that can help reduce parking demand, especially in areas that are unable to widen roads and add more parking.

Arterial Bus Rapid Transit (aBRT) and improving frequencies on other bus routes can help support existing transit riders along with adding new riders. These bus investments that can be made in the short-term, rather than having people waiting for until the 2030-40s for better transit (such as fixed rail transit). Corridors such as West 7th need improvements to the 54 bus route immediately rather than just waiting for the Riverview Corridor streetcar to be built. The North End and the East Side need better buses; giving the buses signal priority at some traffic signals like the A-Line aBRT and Green Line light rail line can help speed up travel times.

Converting unsafe undivided 4-lane roadways (e.g. Rice St) to 3 or 2-lane roadways will help make our city streets and roads safer for all users. Traffic signals should not require people walking to press a "beg button" in order to get a walk signal. Installing more Leading Pedestrian Intervals (LPIs) at traffic signals can help improve safety by making people crossing a road/street on foot more visible to people driving. If the city is able to commit to its current bike plan, Saint Paul will become a much better safer city to bike in, especially with the Capitol City Bikeway. Most of these goals will require better coordination with Ramsey County and MnDOT, along with promoting these goals through representatives and senators who serve residents of Saint Paul in the state legislature. Reducing speed limits and promoting "complete streets" (e.g. narrower lane widths) are examples of actions that will require legislative changes due to current legal restrictions set forth by the state.

The city's government has a large responsibility in shaping the city's future, so I hope the 2040 Comprehensive Plan can be used as a valuable tool as we become a larger and stronger community.

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**Zack Mensinger**

inside Ward 4

January 10, 2019, 11:38 PM

#### Question 1

Zack Mensinger

#### Question 2

1226 Englewood Ave

#### Question 3

I really love many aspects of the 2040 plan as written. Two of the most important changes that could be enacted are upzoning and eliminating parking minimums. With that in mind, I think two of the most important aspects of the plan are those in H-48, which upzones nearly all of the city, moving away from racially discriminatory single-family zoning, and those in LU-13/14, discussing parking.

H-48 will provide some significant options to expand housing opportunities in St. Paul, while eliminating zoning that promotes racial segregation. This will help increase overall housing choice in the city and return us to a time when more flexible housing options provided different living situations for a variety of people, instead of segregating areas of the city into those who can or cannot afford single-family housing.

We are already seeing the effects of housing cost challenges, as evidenced by the increasing number of those with insecure housing using transit as shelters and camping in public spaces. Without an increase in housing options city-wide, there will be little chance to stave off further challenges for these vulnerable people.

While the goals of LU-13 are laudable as is, language in LU-13 should be changed to ELIMINATE, not just reduce parking minimums. And instead of just "supporting" these strategies, they should just be more firmly and completely adopted. If we are to truly reduce auto-dependency and fight climate change, we have to reduce the availability of excess parking in St. Paul. While some might argue that eliminating parking minimums would hurt businesses, I have almost never encountered an area without an excess of parking in St. Paul, plus, parking costs are quite high so requiring them puts small businesses at a disadvantage relative to larger businesses and chains that can more easily afford the costs of parking. Businesses can still provide parking if they see fit, but we should not require an excess of an expensive and environmentally damaging parking spaces. In doing so, we also help encourage people to travel by means other than personal cars, which will make these methods safer and more accessible for everyone.

I love the idea of Neighborhood nodes, but some of them seem misplaced or missing in general. For instance, there is a Node at Kellogg/3rd and Maria. But there is almost nothing at this intersection other than one small market. In contrast, there are many missing Nodes, such as Randolph and Lexington, Snelling and Minnehaha, etc. These intersections have many more resources and attractions, not to mention are better served by transit and therefore should be added as additional

## 2040 Comprehensive Plan

### 2040 Comprehensive Plan Public Feedback

Neighborhood Nodes. Generally, any areas that are located along high frequency, high capacity transit (such as the Green and A Lines) should be classified as Neighborhood Nodes. Density allowances at Neighborhood Nodes should also be clarified.

Lastly, much of the language in the 2040 could be clarified or strengthened. For instance, there are many places where things are to be "encouraged" and "supported": this language should be strengthened in order to actually enact these policies.

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#### Name not available

January 11, 2019, 9:53 AM

##### Question 1

Shannon O'Toole

##### Question 2

223 Avon Street South

##### Question 3

There seems to be very little up to date data backing up the assumptions, particularly with regard to transportation. I am a person who uses public transportation whenever possible so I understand that without a massive capital infusion, the public transportation system will continue to be piecemeal and unsuitable for families and for many others. The transportation vision is very family unfriendly which is odd since St. Paul is fast becoming a bedroom community with fewer and fewer jobs. As to jobs, the failure to identify means to support and enhance small business in the city is a serious omission. The historic and cultural preservation section ignores the city's historic areas west of downtown. I would expect to see goals that preserve those historic areas as well as the affordable housing that is there, and there is little or none of that. As to affordable housing, the rentals being erected right now are not affordable, and while this plan provides lip service to the concept of affordable housing, it actually provides no mandate or even direction. Furthermore, since for most of us our wealth tends to be concentrated in our homes, would it not be more equitable to encourage home ownership and means to make home ownership more widespread? To envision and support programs that help people attain home ownership and maintain those homes all around the city? Lastly, the suggestions that Ayd Mill Road should be connected to I-94 on pages 75 and 80 were noticed. Please go back to the suggestions made when Randy Kelly wanted to connect Ayd Mill Road to I-94 - most people wanted a bike and pedestrian way with the stream recovered. What a great and futuristic way to improve the bike, pedestrian, and water resources of the city! The last thing we need is another freeway abutting District 16. Improve the I-35E - I-94 westbound connection downtown if that is needed and close down Ayd Mill Road to automobile traffic.

#### Jessa Anderson-Reitz

inside Ward 3

January 11, 2019, 10:08 AM

##### Question 1

Jessa Anderson-Reitz

##### Question 2

1880 Grand Avenue Apt 204, Saint Paul, MN 55105

##### Question 3

St. Paul should adopt a 2040 plan that provides abundant and affordable housing for our growing population. We should follow the Minneapolis 2040 plan and relax government restrictions on multi-family housing throughout the city and eliminate parking requirements.

Legalizing the option of dense multi-family housing throughout the city has many benefits. First, it will promote good construction jobs in the city, and give homeowners opportunities to improve their economic well-being by converting their houses into multiple dwelling units. Higher population densities will make it financially practical to add more numerous and frequent transit options, making it more practical for St. Paulites to live without a car. Higher population density will enable more local businesses to flourish. More people walking and taking transit will mean better public health, a stronger sense of community, and the greater public safety that results from more "eyes on the street." A more population-dense St. Paul will be more environmentally sustainable, and more economically resilient to the effects of climate change. A St. Paul with more affordable housing options throughout the city will be less racially and socioeconomically segregated. A St. Paul with more housing options will provide seniors with more options to age in place, and low-wage workers with close proximity to high-wage jobs in the city.

In order to realize this vision, the St. Paul 2040 Comp Plan needs sharper teeth.

For example: Policy H-48 should be strengthened, perhaps with one simple word: "Expand permitted housing types in \*all\* Urban Neighborhoods [that is, every neighborhood in St. Paul without exception] ... to include duplexes, triplexes, town homes, small-scale multifamily and accessory dwelling units."

LU-7 is very vague. The city should broadly upzone and allow multi-family housing without parking



## 2040 Comprehensive Plan

### 2040 Comprehensive Plan Public Feedback

minimum throughout the city.

LU-13 should "eliminate" parking minimums rather than "reduce" them. Parking minimums inherently favor automobiles as a mode of transportation, burdening business owners and housing developers with additional costs that are passed to consumers and residents, and undermining the possibility of St. Paul being a transit-friendly, walk-able community.

LU-28 should be deleted. Transitions in building height harm no one, whether they are gradual or sudden. This policy would only be used to block development which is deemed too dense.

LU-33 should not just "encourage" medium-density housing, but "allow by right."

LU-50 This policy is vague. College neighborhoods should be upzoned to provide sufficient rental housing for students in the immediate vicinity. The current Student Housing Neighborhood Impact

Overlay District should be eliminated.

Policies H-15, H-16, and H-17 are good, but they should be strengthened to require broad upzoning without parking minimums.

In H-47, the language "compatible with the pattern and scale of the neighborhood" should be deleted. This goal should never supersede the priorities of adding dense, affordable housing, and this language can only serve to block needed density.

I strongly support H-48.

Other general notes:

The plan should do more to clarify and specify how much density would be allowed in Neighborhood Nodes, and allow significant increases over the existing limits. Stations along current and planned transit lines (the Riverview Corridor, the A Line BRT, and future BRT Lines) should automatically be upgraded to Neighborhood Nodes.

More Neighborhood Nodes should be added throughout the city, particularly in Highland, Macalaster-Groveland, and Summit Hill, where they are conspicuously few in the current draft. Examples: Grand-Cleveland, Grand-Snelling, Grand-Hamline, Grand-Lexington, St. Clair-Fairview, St. Clair-Snelling, St. Clair-Hamline, St. Clair-Lexington, Randolph-Cleveland, Randolph-Fairview, Randolph-Hamline, Randolph-Lex, Snelling-Ford, Hamline-Ford, Marshall-Fairview, Marshall-

Snelling, Selby-Fairview, Selby-Victoria, Hamline-Thomas, Fairview-Minnehaha, Maryland-Rice, Arlington-Rice.

In regards to Housing, p. 110: It is disingenuous to say that "the City does not have full control of housing development." The city has banned everything but single family residential housing in 90% of the entire city, at the expense of people of color and low-wage workers. This document should recognize this history and explicitly call on the city to reverse course; and it should adopt a policy of allowing and encouraging abundant and affordable housing.

Universal values like affordability of housing and access to jobs should always take precedence over subjective, personal values like a "sense of community."

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### Catherine Day

inside Ward 4

January 11, 2019, 10:47 AM

#### Question 1

Catherine Reid Day

#### Question 2

2242 University Ave W, Studio 204

#### Question 3

Comments on the Saint Paul 2040 Comprehensive Plan  
Luis Pereira  
Planning Director luis.pereira@ci.stpaul.mn.us  
Sonja Butler  
Planning Commission Secretary sonja.butler@ci.stpaul.mn.us

To Whom it Concerns;

On behalf of the board of directors of the Creative Enterprise Zone (both a 501c3 organization and a designated place), I offer the following comments acknowledging Saint Paul's 2040 Plan and the work it represents.

The Creative Enterprise Zone (CEZ), formally recognized by the City's Planning Commission in April 2013 as a special business development district serves to highlight the naturally occurring and intentional relationship between people, place, built environment, and economic development. The vibrant ecosystem of industry and entrepreneurial startups produces a creative economy within the CEZ boundaries that provides essential economic power for the city of Saint Paul and adjacent cities. The Creative Enterprise Zone is the second largest employment center for the city, and the number one source of tax base, both crucial metrics. (See attached info graphic). The board of the Creative Enterprise Zone organization supports many of the elements in the 2040 Comp Plan

## 2040 Comprehensive Plan

### 2040 Comprehensive Plan Public Feedback

and also supports comments offered by the SAPCC and Towerside organizations.

Our focus is on the real and urgent threat to the stability of the area that must be addressed through a combination of land use, zoning, public investment, and civic engagement. We have heard a Chicago based developer indicate that the CEZ is the “last real value in the entire country for real estate development.” The pace of real estate sales for current building stock, the rate of development—commercial and community including increased households—shows that transit produces transformative development for a region. We acknowledge that increased density, mixed uses, and the pressure of displacement will continue to define the area.

In 2018 CEZ commissioned a study to identify the numbers and types of creative businesses operating in the Zone. The study (attached) found more than 300 creative businesses inhabiting a range of spaces with varying sizes and scales of operation. The study highlights the way creative and entrepreneurial economic development needs policies and investments to transition to the next stage of growth and continue to thrive as a vehicle for enterprise, jobs and job creation, creativity, and innovation. This grows more urgent each day as buildings are sold and redeveloped to lower standards and businesses decide where they will chose to operate.

The local, regional, and global economy is rapidly changing and maker spaces are an opportunity to incubate one of the fastest growing local sectors, creative businesses. These artisans, crafts, manufacturers, and tech prototyping companies help create a more diversified and resilience local economic ecosystem for the city, region and state.

Maker spaces strengthen the economic ecosystem through the bridge they create between higher education and industry, a crucial gap that needs to be addressed for talent retention and introducing new career paths in industrial sectors. Maker spaces are also a gateway to entrepreneurship and skill development, growing skills for Saint Paul citizens to enter high-paying industrial jobs – but also to create wealth and local ownership of businesses.

Fostering the businesses that cluster in and around maker spaces will create transition users between niche and traditional industrial jobs, grow skills starting at earlier ages, and produce spin-off and supporting businesses needed by traditional and nontraditional industry alike. Ultimately maker spaces stand for an equitable approach to industrial economic development. They provide an enabling environment for manufacturing businesses creating middle-class jobs and partner with the local community to ensure access to those opportunities.

We support the recommendations offered in the Towerside letter of comments suggesting two additions to the plan including City of Saint Paul’s Resolution 15-1399 (Aug. 5, 2015), which supported the establishment of the University Avenue Innovation District, now known as Towerside Innovation District, and encouraged Saint Paul’s Planning and

Economic Development Department and other city staff to participate in the partnership, supporting mutual efforts to create jobs, green space, and a cohesive district identity and brand.

The Towerside suggestions echo Saint Anthony Park Community Council’s comments regarding the desired redevelopment of industrial areas and the need to include action steps similar to those set out in Policy 3: “Production and Processing” and Policy 98: “Innovation Districts” of the Minneapolis Comprehensive Plan.

The proposed ten-year plan for Saint Anthony Park calls for a new zoning overlay district across Towerside Innovation District and the Creative Enterprise Zone to encourage a variety and density of uses. This would include flexible zoning that will promote businesses including 21st Century urban manufacturing, innovation centers, and creative, co-working, artisanal, and maker spaces. This would also facilitate opportunities for arts and creative spaces, cultural hubs, as well as live/work arrangements in appropriate circumstances. We urge increased requirements for district systems that conserve our resources (water, energy) and renovate and build to highest and flexible uses including solar and other renewable energies, district systems, and building with an eye toward adaptability.

Items 17 and 18 in Figure I-1 of the Implementation Chapter in the Comprehensive Plan call for studies over a 5-10 year period, but we urge Saint Paul to consider a more expedient timeline. Indeed, we want to work together to immediately apply what we already know. Market demand for standard development projects is rapidly growing, and the vast majority of these projects do not help move the needle on the City of Saint Paul’s core values of resilience, climate protection, and equity. Thank you for the opportunity to comment on the plan. We look forward to continuing to work with you on it into the next decade.

Respectfully submitted,

Catherine Reid Day, Board Chair, Creative Enterprise Zone organization on behalf of our board and partners.

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**Alan Arthur**  
outside Saint Paul  
January 11, 2019, 11:51 AM

#### Question 1

Alan Arthur

#### Question 2

2828 University Ave SE #200, Minneapolis MN 55414

## 2040 Comprehensive Plan

### 2040 Comprehensive Plan Public Feedback

#### Question 3

To Whom it Concerns:

On behalf of the board of directors of Towerside Innovation District, I am pleased to provide you with two suggested changes to the Saint Paul 2040 Comprehensive Plan. Please consider this letter our official recommendation to add an "Innovation District" and "Production and Processing" policies. Such a policy will establish and support Innovation Districts to employ district-scale infrastructure and systems and to implement flexible policies and practices to allow for experimentation and innovation consistent with the City's most ambitious goals.

This will advance the City of Saint Paul's Resolution 15-1399 (Aug. 5, 2015), which supported the establishment of the University Avenue Innovation District, now known as Towerside Innovation District, and encouraged Saint Paul's Planning and Economic Development Department and other city staff to participate in the partnership, supporting mutual efforts to create jobs, green space, and a cohesive district identity and brand.

Our suggestions echo Saint Anthony Park Community Council's comments regarding the desired redevelopment of industrial areas for 21st Century business, and the need to include action steps similar to those set out in Policy 3: "Production and Processing" and Policy 98: "Innovation Districts" of the Minneapolis Comprehensive Plan. A copy of each policy is enclosed. This would include flexible zoning over one-size-fits-all. The proposed ten-year plan for Saint Anthony Park calls for a new zoning overlay district across Towerside Innovation District and the Creative Enterprise Zone in order to encourage a variety and density of uses.

This would promote businesses including 21st Century urban manufacturing, innovation centers, and creative, coworking, artisanal, and maker spaces. This would also facilitate opportunities opportunity for arts and creative spaces, cultural hubs, as well as live/work arrangements in appropriate circumstances. Items 17 and 18 in Figure I-1 of the Implementation Chapter in the Comprehensive Plan call for studies somewhat along these lines over a 5-10 year period, but we urge Saint Paul to consider a more expedient timeline. Market demand for standard development projects grows more and more each day and the vast majority of these projects do not help move the needle on the City of Saint Paul's core values. These important strategies for job creation and job density along major public transit promotes the City of Saint Paul's and Towerside's core values of resilience, climate protection, and equity.

We are also pleased to provide Towerside Planning and implementation Framework-Version 2.0 as a supporting document to our recommendation. The purpose of this document is to establish a shared framework for the Towerside Innovation District that is consistent with the goals and plans for the Saint Anthony Park neighborhood in Saint Paul, the Prospect Park neighborhood in Minneapolis, and the University of Minnesota. This planning framework is the culmination of significant

community effort over the last year and a half. One crucial application of the framework is to inform the 2040 Comprehensive Plans for the Cities of Saint Paul and Minneapolis.

The Planning and Implementation Framework-Version 2.0 identifies the key regulatory changes, plans, and infrastructure projects needed to achieve the Towerside vision with all of its economic, environmental and social benefits. It also addresses what the cities and other implementing agencies need to do to help realize this shared vision between funding, regulatory changes, capital project prioritization, and economic development support.

I and Towerside's 35+ partners will continue to engage with you, council members, city staff and others to fully realize the tremendous social and economic impact possible via the collective and collaborative Towerside Innovation District vision. I am proud to be part of an effort that will have an inestimable impact not only broadly economically, but on the lives and futures of so many families and individuals in our community who are now faced with inequity on so many fronts.

Thank you again for your ongoing support of our work.

Sincerely,

Alan Arthur  
Board Chairperson, Towerside Innovation District  
President/CEO, Aeon

(A PDF copy of this letter and three referenced attachments have been emailed to Planning & Economic Development)

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#### Kody Sherlund

inside Ward 2

January 11, 2019, 11:55 AM

#### Question 1

Kody S Sherlund

#### Question 2

310 Toronto Street

#### Question 3

I'd like to stress the importance of a few items in this plan that will make Saint Paul a better place for more people to live in the future and remain competitive as an urban hub. I think the city needs to focus on a handful of themes to achieve this vision: 1) Human-scale, ground-level development that encourages non-auto modes of transportation, like



## 2040 Comprehensive Plan

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walking, cycling, scooters, buses, street cars, etc. As the city (and Minneapolis) continues to grow, density and efficiency will be key. Increasing the viability of these features (like walkability) improve quality of life, safety, and the success and vibrancy of local businesses. This leads me to my second point: 2) Affordability must come with increasing demand to live in the city. Simply put, supply must keep up with demand, particularly with housing. The single most effective way the city can influence increasing the supply of housing is to change zoning laws (allow for duplexes, triplexes, townhomes, and the "missing middle" in general) and to promote infill without minimum parking requirements. If mandatory parking spaces must come with development, incentivizing driving cars will continue, and valuable urban space is wasted on storing cars. I think we agree that the future of the city is not 100% car-centric. People drive because it's convenient - what would the city be like if other modes of transportation were more convenient than driving? If taking the bus, train, or riding a bike downtown is a better option than driving, more people will do it! If walking to a local grocery store is a better option than driving to the supermarket several miles away, people will do that! Let's incentivize and promote this behavior. "If you build it, they will come."

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#### Barry Riesch

inside Ward 4

January 11, 2019, 12:05 PM

##### Question 1

Barry Riesch

##### Question 2

2251 knapp st

##### Question 3

I hope the City of St. Paul will plan as part of its vision to focus on the destruction of our roadways and environment by excessive salt use. We are very destructive as we bomb our roads with salt in the winter and then spend thousands of dollars repairing the damage in the spring, summer and fall. This process also contributes to climate change with the large amounts of fuel consumed by our trucks, all the oil consumed in repaving and repairing roads, etc. Many of our roads are in atrocious condition including our downtown streets. I can imagine the costs involved in all of this process, plus resources consumed, and environmental degradation. There simply has to be a better way and I would be glad to work on that plan. It would be nice if our vision for the future would involve ways to reduce spending, consumption of resources, lessening our carbon footprint, etc.

Thank you,  
Barry Riesch  
Lifelong St.Paul resident

#### Name not available

January 11, 2019, 1:02 PM

##### Question 1

Ralph Pribble

##### Question 2

229 Exeter Pl, St. Paul 55104

##### Question 3

I just want to make sure that the city plans for plenty of green space and parks in the future, including creating new ones and/or expanding existing ones. In my opinion the entire Ford site should become green space or a park; we'll never have that opportunity again. How important are parks and green space? Ask the residents of Manhattan if they would rather that Central Park had instead been given over to affordable housing or mixed-use development.

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#### Scott Berger

inside Ward 1

January 11, 2019, 1:06 PM

##### Question 1

Scott Berger

##### Question 2

1452 Ashland Avenue, Saint Paul, MN 55104

##### Question 3

I'm writing in favor of increased density throughout the great City of Saint Paul. Perhaps more importantly, we have a real need to decrease our immense dependence on the automobile--even for intra-city trips. We can do better on transit, walking, and biking. I would like to see a plan at least as ambitious as Minneapolis's, where landowners have greater freedom to build multi-unit dwellings in traditionally single-family districts, and where increased housing--both affordable and market rate--permeates the city, leading to more neighbors and more diverse neighbors. I love driving, but I know that putting all our eggs in the car basket is myopic thinking. I enjoy a single family house, but enjoy having many multi-family buildings nearby. We need an aggressive plan to combat the long-held conventional wisdom that is causing the city to fail to realize its full potential.

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#### Jeff Zaayer

inside Ward 3

## 2040 Comprehensive Plan

### 2040 Comprehensive Plan Public Feedback

January 11, 2019, 1:53 PM

#### Question 1

Jeff Zaayer

#### Question 2

1750 Saunders Ave

#### Question 3

LU-1 Would benefit from a change to the zoning code particularly regarding minimum floor to area ratio for T1 and T2 zoning. As currently The Snelling Ave corridor is seeing 2 new strip malls being built by right under zoning code and there is also a new strip mall that was completed 2 years ago. All 3 of these buildings have less than a 0.6 FAR.

LU-6 calls for "growing Saint Paul's tax base in order to maintain and expand city service amenities and infrastructure" However policies such as LU1 and LU-6 seem to limit this growth by restricting high density development to certain isolated areas and valuing the preservation of "significant public views" over accommodating basic needs such as housing. I support growing our tax base and making room for everyone who wants to live in Saint Paul and I would like to see the comp plan enable this by allowing denser development across the city by allowing ADUs, duplexes, triplexes, and fourplexes citywide. We need to be bold in our policy implementation to ensure that we are growing the tax base without placing additional pressure on those who can't afford the rent increases caused by the housing scarcity that we are currently experiencing.

Policies LU-13 and Lu-14 aim to increase using space allocated to parking more efficiently. In addition to approaches such as shared use parking, eliminating parking minimums would be effective in allowing the market to provide an appropriate amount of parking, thus relieving the financial and environmental strains associated with building parking in excess because of minimum requirements.

Policy LU-22 calls for "strengthening neighborhood connections to and within downtown Saint Paul through development and improvements that support and complement Downtown businesses and urban villages" A primary factor that limits connectivity between downtown and surrounding neighborhoods is the freeways and river that surround it. Though land use can partially address this disconnect, it would be better addressed by specific walking and bicycling improvements on routes into and out of downtown such as those identified in the city's bike plan and transportation chapter.

Policy LU-34 calls for "providing for multi family housing along arterial and collector streets to facilitate walking and leverage the use of public transportation" Given the public health impacts of exposure to particulate pollution caused by vehicles, as well as the effects of long term exposure to noise that interrupts sleep, I believe that multi family housing should not be exclusively promoted along busy corridors such as Marshall and Snelling Avenues. Because people of color and low income people as well as other underrepresented groups live in multi family

housing at far higher rates than white and higher income people. Focusing multi family housing development near noisy, polluted roads while preserving quiet neighborhoods with clean air for those who can afford single family homes is a massive equity issue. I would like to see the comp plan provided for not only along arterial and collector streets but across the city. In addition to equity benefits, this would allow for the density needed to support walkability and high quality public transportation. Another Land use policy that is not addressed in this section is that of charter schools. In the last decade there has been an explosion of charter schools opening all over the city and often taking valuable industrial properties and making them tax exempt in addition to putting school aged children in an area that has a higher proximity to hazardous material sites, industrial areas often lack sidewalks and other safe route to school infrastructure that help encourage children to arrive to school in ways other than in a passenger vehicle. Also charter schools serve to further segregate our schools and increase disparities in our community. Perhaps limiting the number of schools by ward based on childhood population? Housing

Policy H-1 aims to maintain the housing stock by enforcing property maintenance codes. While it is important that all housing is safe and healthy for those who occupy it, I am concerned that without additional supporting policies this may create a disparate impact on people with low and fixed incomes. Language could be added about allocating funds for those who are unable to pay for property maintenance on their own. Or ensuring landlords pay for upkeep without transferring the burden to their tenants. Additionally tenants protections for landlords who fail to perform upkeep and maintenance would mitigate or help avoid and disparate impacts resulting from this policy.

Policies H-12 and H-13 aim to improve the efficiency of new-build housing. This is important particularly given the climate crisis we currently face, but may not be inclusive of all approaches to reducing household energy consumption. Designing housing so that it can have cooling cross breezes on hot summer days, while it can also retain heat throughout the winter doesn't have to be done in some new and trendy way, people mastered this long before air conditioning and electricity became mainstream, and it may be more cost and energy efficient to consider these older technologies in addition to the new ones mentioned here.

Policies H-15, H 16 and H-17 aim to provide more housing and more diverse housing options. However the policies put forth in the land use chapter may limit the ability of developers and other people building housing to provide a wide range of housing types suiting various housing needs and preferences. Allowing for a diversity of housing throughout the city rather than isolating diverse housing at nodes and along busy corridors would significantly expand capacity for housing to meet the needs of all current and future residents.

Policy H-26 through H-30 all aim to achieve goal 5 "stable rental housing" . These would all be better supported by less restrictive residential zoning citywide. Allowing ADUs and multifamily units throughout the city would go a long way to increase the the supply of rental properties and thus making rental housing more stable and enabling people to provide more housing at a lower cost than major apartment developments. This would similarly support Goal 6: "improved access to affordable housing" by allowing for more housing choice, transferring power from landlords to

## 2040 Comprehensive Plan

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tenants by giving tenants choice and leverage regarding their living situation.

Transportation

Policy T-2 aims to "prioritize transportation projects and ensure well maintained infrastructure that benefits the most people" by using surface condition and multimodal usage rates. This policy is well-intentioned but may end up disproportionately benefiting drivers given that most infrastructure across the city currently serves drivers first and everyone else second. By instead focusing on the most vulnerable road users (pedestrians and cyclists) and making improvements with their safety and comfort in mind, these modes of transportation can become more attractive and therefore more popular and increase their usage rates. A nice side benefit of such improvements is that they typically improve safety for motorists as well, and therefore making these roads better for everyone. A policy that explicitly aims to serve the most vulnerable users first would be more beneficial and would work toward several goals while also supporting several other policies throughout the chapter most notably T-3.

Map T-14 Future Right of way needs: this map is concerning as the two larger corridors of identified need occur in ACP50 portions of the city and all 3 cut through valuable industrial land and park space. I hope the city takes serious consideration into the damage these high traffic corridors would do not only to the tax base in Saint Paul but also to the community impact of barriers that corridors like these can create in addition to the health disparities by putting more people in proximity to high traffic corridors.

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#### Name not available

January 11, 2019, 2:44 PM

##### Question 1

No response

##### Question 2

No response

##### Question 3

No response

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#### Andrea Jorissen

inside Ward 2

January 11, 2019, 3:08 PM

##### Question 1

Andrea Jorissen

##### Question 2

830 Grand Avenue

##### Question 3

Energy efficiency in residential apartment buildings is hindered by the "Renter's Paradox". If an 8-unit building gets one electric bill split 8 ways evenly, there is little incentive to conserve. Additionally, the landlord is responsible to add the individual meters, LED bulbs, energy star appliances, solar panels, etc for energy efficiency, yet the renter reaps the benefits. Need incentives for landlords to make upgrades.

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#### Cody Zwiefelhofer

inside Ward 5

January 11, 2019, 4:03 PM

##### Question 1

Cody Zwiefelhofer

##### Question 2

52 Maywood Pl, St. Paul, MN 55117

##### Question 3

I am glad that Saint Paul is looking far into the future and is doing a great job with this plan. However, I do not feel that it goes far enough in eliminating inequities in our society, combating climate change, or allowing for safe travel for all. Some areas which I feel this plan is lacking include:

1. Not clearly defining that the reduction in use of cars with respect to land use, transportation, and housing is one of the primary goals St. Paul needs to move to in 2040;
2. Eliminating parking minimums altogether needs to become public policy;
3. Fixating on allowing higher densities only near arterial roads does nothing if that density is not mixed throughout neighborhoods as well. The best neighborhoods have density and diversity of people, businesses, churches, parks, and other uses of a city. In addition, many of St. Paul's arterial roads need road diets before density were to occur on them; by discouraging pedestrian traffic, St. Paul is actively working against the vibrancy of a neighborhood.
4. Explicitly calling out removing existing parking lots in favor of establishing homes and businesses.
5. Addressing the housing shortage by prioritizing the development of the "missing middle" types of housing (duplexes-fourplexes; small apartment complexes).
6. Ayd Mill Road should not be redeveloped with cars in mind; they should not be allowed.

## 2040 Comprehensive Plan

### 2040 Comprehensive Plan Public Feedback

7. Development opportunities should not just be focused on "neighborhood nodes."

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**Lisa Ochs**

inside Ward 1

January 11, 2019, 4:27 PM

**Question 1**

CAAPB

**Question 2**

50 Sherburne ave, ste 204, st paul, mn 55155

**Question 3**

Hi may we please have the 2040 comprehensive plan mailed to us?  
Thanks.

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**Jake Rueter**

inside Ward 4

January 11, 2019, 4:39 PM

**Question 1**

Jake Rueter

**Question 2**

1347 Blair Ave

**Question 3**

Parking minimums should be eliminated from Saint Paul's zoning code. Establishing artificial floors on the number of parking spaces that a development must provide increases the cost of development and ultimately rent or businesses and residents, regardless of whether or not they need the parking.

More "nodes" should be added to the map, especially where two transit lines meet or there is existing streetcar-style commercial development. These nodes are what make Saint Paul an exciting and walkable place to live!

People walking, bicycling, and taking transit should be given priority over infrastructure improvements for single-occupancy vehicles and parking spaces. Our city's transportation system should serve people, not metal boxes that carry people around.

Saint Paul should follow the lead of Minneapolis and eliminate single-family exclusive zoning. Triplexes should be allowable anywhere in our city.

Saint Paul should experiment with transitioning residential streets into woonerfs that could allow for additional gardens, play space, etc. We should take back some of the massive amount of space that is given to cars in this city and make it a place for people to live and play.

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**Philip Bussey**

inside Ward 4

January 11, 2019, 6:31 PM

**Question 1**

Philip Bussey

**Question 2**

1830 Hewitt Ave

**Question 3**

I think this comprehensive plan should recognize the negative impact that exclusively zoning for single family homes has done to our city and allow for multi family dwellings throughout the entire city, increase where mixed-use buildings are allowed, and remove parking minimums.

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**Nicholas Rossini**

outside Saint Paul

January 11, 2019, 7:36 PM

**Question 1**

Nicholas Anthony Rossini

**Question 2**

1996 Eldridge Ave W

**Question 3**

My name is Nicholas Rossini, and I want St. Paul by 2040 to have finished its already studied streetcar proposed routes (along with the W 7th one), increase LRT transit options in more corridors, and put a cap over highway strangling portions of downtown St. Paul. Also the need for RAIL transit throughout Minnesota in general needs to be improved with high speed rail (not slow Amtrak that shares rail lines with freight). Also density all over needs to be heightened, especially along all transit routes and not just at certain nodes of city. Clean, renewable energy should be

## 2040 Comprehensive Plan

### 2040 Comprehensive Plan Public Feedback

implemented throughout the whole city by 2040. Thanks for looking at my concerns

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#### **Brendan O'Shea**

inside Ward 4

January 12, 2019, 1:33 AM

##### **Question 1**

Brendan O'Shea

##### **Question 2**

1861 Taylor Avenue W.

##### **Question 3**

The size and number of neighborhood nodes should be expanded to allow for greater mixed-use density in commercial corridors. Increased density up to a half mile from the center of the node would be preferable. Neighborhood nodes that align with A Line stations, such as Snelling/Minnehaha, should be included.

The land use section describes the need to balance the needs of commerce with adjacent land use: "It is important to provide for [commercial transport] uses while ensuring minimum negative external impacts to adjacent land uses." Policy LU-53 addresses the mitigation of negative effects of highways. LU-54 or a related policy should similarly address the mitigation of negative effects of freight and intermodal operations, particularly in those areas (such as near Newell Park) where the encroachment has been of freight and intermodal uses upon residential areas rather than the opposite as the text of LU-54 implies.

Ensure that policy T-14 does not conflict with policy T-3; freight corridors are also used by cyclists and pedestrians, and their safety as vulnerable users should be prioritized in all Saint Paul streets. Streets can be both safe and commercially productive.

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#### **K L**

inside Ward 4

January 12, 2019, 2:55 PM

##### **Question 1**

KL

##### **Question 2**

midway parkway

##### **Question 3**

I support the following additions to the city's plan: 1) creative policies to stop the negative impacts of gentrification on residents and small businesses such as limits on how much rent can increase to protect affordable housing and commercial spaces for businesses (such as New York City's rent control 2) climate resiliency: the city needs to implement aggressive plans to prepare the city for the impacts of climate change and should involve the district councils in advancing resilience plans and also getting members of their communities educated on why we need to act and what they can do

---

#### **Kathryn Noble**

outside Saint Paul

January 12, 2019, 6:01 PM

##### **Question 1**

Kathryn

##### **Question 2**

No response

##### **Question 3**

As recently reflected by comments from a number of members from the community, the draft 2040 plan is not ambitious enough as it relates to transportation planning. St. Paul is currently very car-centric with single use parking lots and street parking, which makes for very inefficient and costly use of valuable space. The city needs to limit or completely eliminate "drive thrus" within city limits (Starbucks on Marshall/Snelling and a proposed Dunkin Donuts at Hamline and Larpenteur, rejected rightly by the city).

Other suggestions are to consider the possibility of alleyway and sidewalk snow removal, idling vehicle bans in residential areas, traffic calming measures in urban arteries (Larpenteur, Energy Park, Rice being chief culprits), prioritizing multimodal transportation (including bikeshare which is very disappointing at the moment), organic recycling collected at the alleyway, and more mixed use developments at key areas. The departure of businesses from Downtown is also a key area of concern and the city needs to do a lot more to spur business/residential development in the downtown core.

St. Paul needs to do a lot more than the 2040 plan if it wants to live up to its name of "the most livable city in America."

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#### **Name not available**

January 12, 2019, 8:48 PM

## 2040 Comprehensive Plan

### 2040 Comprehensive Plan Public Feedback

#### Question 1

No response

#### Question 2

No response

#### Question 3

No response

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### Michael Healy

inside Ward 3

January 12, 2019, 10:31 PM

#### Question 1

Michael Healy

#### Question 2

653 Fairview Avenue South

#### Question 3

The plan looks great except for one major flaw. It needs to be amended to call for the elimination of minimum off-street parking requirements, at least for commercial and industrial businesses and possibly some types of residential development as well. The policy goal could be formatted as something along the lines of "The City will eliminate minimum parking requirements for commercial and industrial properties and explore the elimination or reduction of minimum parking requirements for residential properties."

The usefulness of minimum parking requirements has been thoroughly debunked and they have very little support these days from anyone who takes the issue seriously. The requirements are even starting to lose support in rural areas and amongst conservatives, despite their "pro-car" attitudes, because minimum parking requirements are anti-business and flat-out don't work well. Minimum parking requirements represent an unnecessary and heavy-handed "big government" intervention into the marketplace which attempts to solve a problem that doesn't even exist. Most businesses that need parking are going to build parking as they won't be able to get bank financing otherwise. Developers will build the type of parking that they need to build to keep their tenants happy. The free market will figure parking out and 99% of the time will do a better job than the zoning code's arbitrary parking requirements. Cities kill or hurt good projects all the time by making an arbitrary determination that "there isn't enough parking." The business then either has to try to get a variance (costly, time-consuming, and prone to sabotage by neighborhood groups and other businesses) or has to buy up neighboring

properties to bulldoze them and put up more parking. More often than not, this results in an oversized parking lot that sits at least partially empty most of the time. Also, the City loses the tax base from the buildings that had to be bulldozed to create the parking.

Parking costs of lot of money to build. Building unnecessary extra parking stalls (surplus stalls built just to please the City) drives up the cost of development. Structured parking generally ends up costing somewhere between \$20,000-\$30,000 per parking stall. Surface parking is cheaper (but still not cheap) but it eats up a ton of land and makes a neighborhood uglier and less walkable. Nobody wins when there is "too much" parking, both the property owner and the City are losers in that situation. It doesn't seem reasonable to talk about wanting development and housing to be "affordable" but then turn around and impose unnecessary mandates that drive up development costs and make everything less affordable. Developers are going to build parking if their project needs parking. There's no benefit in having the City require even more parking beyond what the free market is already providing, especially when our stated goal is encouraging people to drive less and consider using transit or active transportation.

Minimum parking requirements have caused immense harm to American cities since their widespread adoption in the 1960's. None of Saint Paul's most interesting/walkable neighborhoods would be allowed to be built today because of minimum parking requirements. Selby/Dale, Grand Avenue, Snelling/Selby, and all of the cute little streetcar nodes fail to have "enough" parking under the code and would not be allowed to be built in 2018.

It would be a huge missed opportunity if we failed to include this goal in our 2040 plan. Honestly, I don't think its possible to achieve any of the other goals regarding walkability, housing affordability, increased transit usage, etc. if this issue isn't addressed. By 2040, most cities aren't going to have minimum parking requirements, everything is moving in that direction. Saint Paul has an opportunity to be a leader in this. Please, let's get some language in our comprehensive plan!

---

### Name not available

January 13, 2019, 11:17 AM

#### Question 1

Vicky Adams

#### Question 2

1890 Orange Ave E

#### Question 3

Living on the east side of St Paul for 14 years and have worked downtown I'm leary of the plan to increase density with no regards to single family



## 2040 Comprehensive Plan

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home owners like myself and those of my neighbors. We already have many rental units both duplexes and triplex"s and it hasn't been good with more crime and more traffic and rental costs have not been lowered or stable. Now with our property taxes going up its pushing more of us out for services we get are truly less than what we are paying for! We have much diversity already with working class folks who will see no upside to just jamming more people in already extremely close proximity to one another! The city needs more impute from its homeowners and have meetings that are when we can actually attend!

---

#### Vicky Adams

inside Ward 6

January 13, 2019, 11:24 AM

##### Question 1

Vicky Adams

##### Question 2

1890 Orange Ave E

##### Question 3

Living on the east side of St Paul for 14 years and have worked downtown I'm leary of the plan to increase density with no regards to single family home owners like myself and those of my neighbors. We already have many rental units both duplexes and triplex"s and it hasn't been good with more crime and more traffic and rental costs have not been lowered or stable. Now with our property taxes going up its pushing more of us out for services we get are truly less than what we are paying for! We have much diversity already with working class folks who will see no upside to just jamming more people in already extremely close proximity to one another! The city needs more impute from its homeowners and have meetings that are when we can actually attend!

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#### Name not available

January 14, 2019, 10:19 AM

##### Question 1

Kristina Kliber

##### Question 2

2204 Dayton Avenue Saint Paul MN, 55104

##### Question 3

How does the proposed plan impact the current Student Housing Overlay

District that was enacted in 2012? Specifically, what is included in the 2040 Comprehensive Plan to prevent absentee-landlord owned single-family student rental homes from being converted into duplexes and triplexes? Increasing the number of college students living in an already densely populated part of Saint Paul will lead to a tipping point where college students outnumber other renters and homeowners leading to a vastly different quality of life.

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#### Kristina Kliber

inside Ward 4

January 14, 2019, 10:21 AM

##### Question 1

Kristina Kliber

##### Question 2

2204 Dayton Avenue Saint Paul, MN 55104

##### Question 3

How does the proposed plan impact the current Student Housing Overlay District that was enacted in 2012? Specifically, what is included in the 2040 Comprehensive Plan to prevent absentee-landlord owned single-family student rental homes from being converted into duplexes and triplexes? Increasing the number of college students living in an already densely populated part of Saint Paul will lead to a tipping point where college students outnumber other renters and homeowners leading to a vastly different quality of life.

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#### Kai Peterson

inside Ward 2

January 14, 2019, 12:20 PM

##### Question 1

Kai Peterson

##### Question 2

172 6th St. E, Apt. 2506 St. Paul, MN 55101

##### Question 3

St. Paul's draft 2040 Comprehensive Plan is a good start, but it could be improved.

Policy H-48 is particularly important as a way to improve density in all neighborhoods and make housing more affordable. H-48 should be re-

## 2040 Comprehensive Plan

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worded to make it more specific by adding the word 'all' so it reads "Expend permitted housing types in all Urban Neighborhoods..." This change will remove ambiguity.

Affordable housing is rightly a major focus in the draft comprehensive plan. However, the draft plan is silent on who should benefit from affordable housing, and neighborhood-level diversity could be advanced by being more specific. The comprehensive plan should add a policy goal in the housing chapter making development projects differentiate between affordable housing to be designated for seniors and those oriented towards families. Affordable housing is important for both seniors and families, but the needs of those populations differ, and diverse neighborhoods and housing choices can be better achieved by differentiating between them for reporting and planning purposes. Requiring projects to report separately on affordable housing units designated for seniors and those designated for families will increase transparency, drive policy goals H-15, H-16, and H-17, and align with HUD's guidance on affirmatively furthering fair housing. Without this change, developments in predominantly white neighborhoods are more likely to fulfill their affordable housing goals by creating only senior-oriented housing.

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#### Keith Koch

inside Ward 4

January 14, 2019, 12:34 PM

##### Question 1

Keith Koch

##### Question 2

2204 Dayton Avenue

##### Question 3

While I applaud the city's leadership in looking forward how to meet the needs of our growing community/economy and trying to structure a path-forward to achieve desirable outcomes, I worry that current voices creating plans are lacking a balanced view of what characteristics of St.Paul have made it a successful and desirable city to-date.

I understand that more density and population are needed to help our city's economy, reduce greenhouse emissions and leverage infrastructure; but I also believe that a balanced approach that respects the integrity of existing home-owners, neighborhood character and scale are important to consider in the plan. In my opinion, examples of where the city has lost sight of the balance are the re-zoning of Marshall Avenue and the consideration of removing the student-housing overlay around St.Thomas campus. Both of these situations will have an irreparable impact on existing neighborhoods and the home-owners in those areas, it

will be years before we understand the development to come and the consequences of the changes allowed in those areas.

Please understand that radical changes will lead to radical outcomes, and that a more gradual moderate change will allow the city to make adjustments as the (positive and negative) impacts are better understood to manage the evolution of changes we want to see in the city (and therefore mitigate the changes we all find unfavorable).

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#### Michael Kuchta

inside Ward 5

January 14, 2019, 12:51 PM

##### Question 1

Michael Kuchta, executive director, District 10 Como Community Council

##### Question 2

1224 Lexington Parkway N

##### Question 3

I want to bring to your attention a couple of omissions:

Page 33: A reminder that both the District 6 and District 10 boards have requested that the Como/Front/Dale area be designated an "opportunity site," not merely a "neighborhood node."

Page 107: The draft does not include Northwest Como Recreation Center in its inventory of non-regional parks and trails.

Thank you.

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#### Name not available

January 14, 2019, 1:02 PM

##### Question 1

Tom Basgen

##### Question 2

659 Wilder St S Unit A

##### Question 3

This plan should be far more aggressive in its Justice and Climate Goals. We should be seeking to double or triple our transit ridership numbers, triple or quadruple our biking and walking trips. We should be investing in Public affordable housing and we should be building it in parts of the city where it typically hasn't been located. We need to be spending our money on things that actually return on investment. Specifically not cars,



## 2040 Comprehensive Plan

### 2040 Comprehensive Plan Public Feedback

specifically not cops.

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#### John Slade

inside Ward 7

January 14, 2019, 2:04 PM

##### Question 1

John Slade

##### Question 2

463 Maria St.

##### Question 3

Housing

H1 – add Code enforcement will be done in such a way as to not disparately impact racial or ethnic groups. Protection of tenants who trigger enforcement from retaliation will be a top priority.

H16 – Promotion of housing choice among diverse income levels will not be used to upscale units in poor neighborhoods.

H19 – needs some mention specifically of racial disparity and the history of unfair housing practices (as per H20)

H22 – Any promotion of housing ownership will be done with a racial justice lens and with an eye to remedy of historic housing discrimination.

H26 – Add We are aware that tenant rights need additional support and will work to increase them.

H26 – Add The City will engage in fair housing testing to determine the depth of racial, gender, or cultural bias in the rental and ownership housing.

H32 – The city's target for new rental construction affordability will be determined by our Met Council affordability goals. Given 830 units at 30% AMI, 130 units at 50% AMI and 1010 units at 60% AMI, our goals will be 25% at 30% AMI, 5% at 50% AMI and 15% at 60% AMI (100% of the 30% goal and 50% of the 50% and 60% goals)

H33 – the City's target for new ownership will be determined by Met Council affordability goals. Given approximately 130 units at 50% AMI and 1010 units at 60% AMI, our goals will be 5% at 50% AMI and 15% at 60% AMI (1/2 of the goals at 50% and 60%)

H41 – “move forward with using official controls” – not “consider use of”  
H44 – “Make achieving the Met Council Affordable Housing goals a top priority both in planning, legislative priorities, and comprehensive plan language.”

#### Name not available

January 14, 2019, 3:10 PM

##### Question 1

Jacob Reilly

##### Question 2

1220 Earl Street

##### Question 3

I would like to address five points today. I'll even try to be brief. They are: praise, jobs/labor force, affordable housing, accountability, and a hot tip. I'll start with the hot tip: Map LU-5 community designation must be revised to show the City in context with surrounding communities and the plan must state somewhere (anywhere. On the map. In the text. Somewhere.) that the minimum residential density for an Urban Center is 20 units per acre, in order to meet the minimum requirements outlined in the Checklist of Minimum Requirements provided by the Metropolitan Council.

1. I am so proud to have been a part of this team that intentionally went out and listened to people in their neighborhoods, workplaces, and where they recreated. I am proud to see those folks' ideas reflected in this plan. And I am grateful to have a plan that not only has a neat user's guide companion but also is consumable by those who live, work, and play here in Saint Paul. Thank you for your hard work.

2. I encourage the planning commission to request staff evaluate how to best incorporate a policy or an element of the implementation plan in the land use chapter that examines how to collaborate or coordinate or support efforts to move the 1,000s of people who are not participating the labor force at all to move into the workforce. Whether that's collaborating with the County's Workforce Investment Board; speaking with staff at DEED and MMB about the Connect 700 program (a program that moves people with disabilities back into the workforce, specifically in government positions); collaborating with folks working on moving those with incarceration histories back into the workforce; or collaborating with the trades and the educational institutions the Mayor and Director Turner have been building relationships with in order to match those businesses seeking resources from the HRA or PED with those who are unemployed, underemployed, or just under the radar. Many of our employers could solve their workforce shortage issues with those already living here in Saint Paul. This is an equity issue. It is also a human rights issue.

3. Yesterday MPR did a piece on the Principal of Maxfield Elementary School and his struggles to help families in his school struggling with homelessness. Last week Councilmember Jalali Nelson rode the train with the folks experiencing homelessness on our Transit system. Clearly there's a desire in Saint Paul to eliminate homelessness. Therefore I ask the Planning Commission to go back to the drawing board on Housing, first by considering a Housing First policy to start moving all of those that live here in Saint Paul whether on the street or in a train or a car or a shelter in to a place to call home. This will likely involve partnerships with

## 2040 Comprehensive Plan

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developers, Ramsey County, mental health agencies, Metro Transit, and many others. Additionally, the commission should specifically examine Policy H-32. I encourage you to look at developing a more meaningful and aspirational policy by reexamining the utility of dividing up the affordability level by 10/10/10. Clinging to that concept ignores markets. It ignores how the City's affordable housing allocation as set by the Metropolitan Council is structured. A commitment to 30% of all HRA-funded projects being affordable is commendable, even laudable. But the 10/10/10 requirement is arbitrary. Minneapolis made the news with their residential zoning district policy direction. Saint Paul could also make headlines as the first large city with a real Housing First policy, taken from a real-estate development standpoint. Saint Paul could also make headlines by maintaining the 30 percent affordability requirement for all HRA-funded projects. We could have more mixed-income/mixed-use projects like 2700 University built all over the city, if that policy was revised.

4. Finally, we promised those we spoke to that we would hold ourselves accountable to the people we talked to. That we would provide a document that had policies that were legible, defensible, and meaningful. And that we would stand by them. I think you've done that from a document standpoint. That needs must also be done from an institutional accountability standpoint. So, in closing, I urge you to remember why we plan for a 20-year horizon. In reality we do it for our children and our children's children. The way we planned for, used, and developed land 50 years ago impacts us today. And impacts some communities more than others. Leaving us with not only costly wounds to our communities, but also costly projects to physically reconnect those communities. That will hold true in the next 20 years and 40 years and 80 years. So, let's get this right. Let's be both accountable to those we spoke to and the neighbors to whom we have an obligation to today, but also to our children, their children, your children, and those who are yet to come.

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#### Alicia Valenti

inside Ward 4

January 14, 2019, 3:16 PM

##### Question 1

Alicia Valenti

##### Question 2

1939 Marshall Ave

##### Question 3

Policy LU-6 calls for "growing Saint Paul's tax base in order to maintain and expand City services, amenities and infrastructure". However, many other proposed policies (such as LU-1 and LU-11) seem to limit this growth by restricting high-density development to certain areas and valuing the preservation of significant views over accommodating basic needs such

as housing. I support growing our tax base and making room for everyone who wants to live in Saint Paul, and I would like to see the Comprehensive Plan enable this to a greater extent by allowing for denser development across the city.

Policies LU-13 and LU-14 aim to increase using space allocated to parking more efficiently. In addition to approaches such as shared-use parking, eliminating parking minimums would be effective in allowing the market to provide an appropriate amount of parking, thus relieving the financial and environmental strains associated with building parking in excess because of minimum requirements.

Policy LU-34 calls for "[providing] for multi-family housing along arterial and collector streets to facilitate walking and leverage the use of public transportation." Given the public health impacts of exposure to particulate pollution caused by cars, as well as the effects of long-term exposure to noise that interrupts sleep, I believe that multi-family housing should not be exclusively promoted along busy corridors such as Marshall and Snelling avenues. Because people of color, people with low incomes and other traditionally underrepresented groups live in multi-family housing at far higher rates than white people and people with high incomes, focusing multi-family housing development near noisy, polluted roads while preserving quiet neighborhoods with clean air for those who can afford single-family homes is a massive equity issue. I would like to see the comp plan provided for not only along arterial and collector streets, but across the city. In addition to equity benefits, this would allow for the density needed to support walk-ability and high-quality public transportation.

Policy H-1 aims to maintain the housing stock by enforcing property maintenance codes. While it is important that all housing is safe and healthy for those who occupy it, I am concerned that without additional supporting policies this may create a disparate impact on people with low incomes. Language could be added about allocating funds for those who are unable to pay for property maintenance on their own, or to ensure that landlords pay for upkeep without transferring the burden to their tenants. Additionally, tenants' protections for landlords who fail to perform upkeep and maintenance would mitigate or help avoid any disparate impacts resulting from this policy.

Policies H-12 and H-13 aim to improve the efficiency of new-build housing. This is important, particularly given the climate crisis we currently face, but may not be inclusive of all approaches to reducing household energy consumption. Designing housing so that it can have cooling cross breezes on hot summer days, while it can also retain heat throughout the winter, doesn't have to be done in some new and trendy way; people mastered this long before air conditioning and electricity became mainstream, and it may be more cost- and energy-efficient to consider these older technologies in addition to the new ones mentioned in these policies.

Policies H-15, H-16 and H-17 aim to provide more housing and more diverse housing options. However, the policies put forth in the land use chapter may limit the ability of developers and other people building

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housing to provide a wide range of housing types suiting various housing needs and preferences. Allowing for a diversity of housing throughout the city rather than centering diverse housing at nodes and along busy corridors would significantly expand capacity for housing to meet the needs of all current and future residents.

Policies H-26 through H-30 all aim to achieve Goal 5: "stable rental housing". These would all be better supported by less restrictive residential zoning citywide. Allowing ADUs and multifamily units (townhomes, triplexes, and so forth) throughout the city would go a long way to increasing the supply of rental homes, thus making rental housing more stable and enabling people to provide more housing at a lower cost than major apartment developments. This would similarly support Goal 6: "Improved access to affordable housing" by allowing for more housing choice, transferring power from landlords to tenants by giving tenants choice and therefore leverage regarding their living situation.

Policy H-48 calls for permitting "duplexes, triplexes, townhomes, small-scale multi-family and accessory dwelling units" in Urban Neighborhoods. This would be a huge step forward for allowing increased density citywide and opening all of our neighborhoods to more neighbors and I strongly support it.

Policy T-2 aims to "prioritize transportation projects and ensure well-maintained infrastructure that benefits the most people" by using surface condition and multi-modal usage rates. This policy is well-intentioned, but may end up disproportionately benefiting drivers, given that most infrastructure across the city currently serves drivers first and everyone else second. By instead focusing on the most vulnerable road users (pedestrians and bicyclists) and making improvements with their safety and comfort in mind, these modes of transportation can become more attractive and therefore more popular, increasing their usage rates. A nice side benefit of such improvements is that they typically improve safety for motorists as well, making the roads better for everyone. A policy that explicitly aims to serve the most vulnerable users first would be more beneficial, and would work toward several goals while also supporting several other policies throughout the chapter (such as, notably, T-3).

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### Kathy Sidles

inside Ward 6

January 14, 2019, 3:27 PM

#### Question 1

Kathy Sidles

#### Question 2

1380 Winchell St., Saint Paul, MN 55106

#### Question 3

Metro Urban Wildlife Corridors are in Trouble

Kathy Sidles, 01/13/2019, east side Saint Paul resident kesid@aol.com

#### BACKGROUND

I walk to Frost Lake Park to see ducks and warblers, and bike down the Bruce Vento Bike Trail to hear birds, in the east side of Saint Paul. I collect trash and pull garlic mustard along the trail and in neglected green spaces above the buried Lake Phalen creek and sewer pipes. I count birds and bumblebees as I work and enter data into ebird.org and bumblebeewatch.org. Chimney Swifts nest in apartment chimneys, feeding above Phalen Corridor as the creek bed it used to be, and I count them. I organize the Audubon Christmas Bird Count in this area – we always see Eagles and Hawks and sometimes an Owl. I enjoy living within and not instead of nature here on the east side of Saint Paul.

Its not just me! Neighbors created the Big Urban Woods (1) at the Phalen Boulevard yard waste drop off site, a flower garden kept up by a neighbor is at the rail road berm along Maryland, a group teaching Native American traditions is at another woods, and behind apartments are dirt people paths to green spaces and across rail road right-of-ways.

As a high school student in southern Iowa I learned the importance of natural area corridors – wildlife genes have to flow for a healthy population. As I pick up trash and pull invasive Garlic Mustard I see how a wildlife corridor works close up. Though not a biologist, through reading (2) and observation I have learned that insects, the birds and plants that depend on insects for food and pollination, and other plants and animals, need particular and connected habitats full of native plants to thrive.

#### PRESENT SITUATION

I see good natural area upkeep near the Bruce Vento Trail. Saint Paul Parks employees burn Ames Lake, East Side Heritage Park, and shores of Lake Phalen. There are problems elsewhere where little or no maintenance is done. Native plant wetlands are filling in with burdock and spotted knapweed. Storm ponds and the Vento Trail are being mowed and taken over by lawn grass. Train wheels have been fixed (3) so, though fire-resistant oak and prairie grass remain, wheels no longer set the right-of-ways on fire and Spotted Knapweed and Garlic Mustard invade. And with no formal pick up plans, trash blows to and builds up in these natural areas.

There is a plan to upgrade Minnesota wildlife corridors and some money to do it. According to the 2007 state corridor map (6) the only complete corridors in the Twin Cities are along the Mississippi and Minnesota rivers. There is a corridor on the map through Washington County and along the Saint Croix. But the map shows large areas with no corridors in dense urban neighborhoods where most families live.

A highlight is the presence of Endangered Rusty Patch Bumble Bees in the Metro area, especially in and near Saint Paul! (21) I found 9 of them

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along the Vento Trail. So far they are not found in large numbers outstate. They need native flowers blooming throughout the season so their presence means we still have large areas of quality green space. The Fish and Wildlife Service has marked areas where their presence must be taken into account for development. ((20) and map below). There are three other endangered species in Ramsey County, two in the Mississippi and one in the Saint Croix.

But at least three large development plans for the east side of Saint Paul affect the urban corridors and the Rusty Patches. See maps below for their locations -

1. There is an approved plan for the Rush Line bus lanes (5), which removes much of the Vento Bike Trail and its natural areas. The plan could be changed so the Vento Trail is a Regional Park and Route 64 buses are upgraded like the Snelling buses to go to Bus Rapid Transit on 35E. This would help save the Rusty Patched, improve transit to jobs throughout the metro for the people along Maryland and White Bear whose ridership numbers were used to justify replacing the trail – and not just go to White Bear Lake with few jobs after an additional bus transfer.
2. The Port Authority is planning for an upgrade of the Rail Road so it goes into park land at Pig's Eye. There are alternate solutions for this proposal also. This area is part of the same east side Saint Paul Rusty Patched critical area and involves barge traffic on the Mississippi. There are other species of concern that state maps say have been seen in the park and endangered species in the river.
3. The metro area is planning for a large population increase. Saint Paul's plan for this so far doesn't include improved wildlife corridors, from looking at its map. (4) The plan adds denser industrial, mixed use and public transit corridors and removes green spaces from the map other than city and regional parks.

These future city and transit plans make the lack of protected and enhanced continuous wildlife corridors through the city even worse. Neighborhood Chimney Swifts and Grackles that are listed in the 2014 State of the Birds as "Common Birds in Steep Decline" will continue as well as we could contribute to the extinction of the Rusty Patched Bumble Bee. And most importantly for the long term health of all of us, local people lose many of their nearby wildlife corridors and parks that enhance and connect isolated urban natural areas.

#### NATURAL AREA FUNDING

There is money to preserve and upgrade Minnesota natural areas. From what I could find online there is about \$46 per person available each year – roughly \$11 from gambling and \$35 from our 3/8 percent sales tax (7). About \$13 million of this money goes each year to metro wildlife corridors. This is about \$4.50 per person per year in the Metro area. It is called Metro

Conservation Corridors – MeCC (8). It is run this year by the Minnesota Land Trust and DNR. Even with sales tax and gambling money available in Minnesota the MeCC web site says 60 acres of natural areas are being lost in the Metro area each day! (8). If these numbers are right we should look at if giving \$46 and getting \$4.50 back is enough to protect our quality river town wildlife corridors.

#### WHY ARE NATURAL AREAS STILL BEING LOST?

None of the neglected natural areas I volunteer in – the Bruce Vento Bike Trail, buried Phalen Creek and sewers, or Frost Lake Park - receive this money that I know of. They don't meet the criteria of being a Regional Park or have not applied for it. Railroads, the many east side cemeteries, private land, and Highway right-of-ways also don't qualify and are not seen as the urban wildlife corridors they could be.

One of the goals of the sales tax money is to increase access to natural areas by young people and the diverse populations of Minnesota (9). The highest concentration of households with children, lower income people, and diverse populations in Minneapolis and Saint Paul, and maybe the state, is the east side of Saint Paul (10). But no gambling or sales tax funds can be used for natural areas in large parts of it. And from what I have seen development proposals either don't have to look at loss of wildlife and wildlife corridors, and the public input isn't asked for until planning is completed. Also the new Saint Paul development plan map doesn't include wildlife corridors or non-park green spaces like the old one did – just high density industrial.

These same things metro-wide could be a cause of the removal of natural areas that MeCC is worried about.

#### WHAT CAN BE DONE? HOW CAN WE ALL HELP?

Here are twelve ideas to stop removal of urban natural areas, enhance them, and increase use and understanding of them by young and diverse metro area people:

1. Saint Paul and other cities long range development plans could include no loss of green space and higher density development on already paved/developed areas. All development proposals such as the Rush Line and Pig's Eye rail upgrade should include an assessment of natural areas lost and degraded and impacts on endangered species before project approval. For example, environmental assessment of the Rush line bus lane replacement of the Vento Trail is being done after approval. (5)
2. Support neighborhoods along river corridors that are included in recent MeCC plans (11) to bring some public dollars back to urban neighborhoods. Expand the plan to neighborhoods that are green interpretive desserts.
3. All parts of the metro area can have a protected neighborhood corridor. Give Rail Roads (3), highway right of ways, buried stream and waste water green spaces names, protect them, pick up the trash and enhance them.
4. The Bruce Vento Bike Trail could become a Regional Park and enhanced for wildlife instead of a bus lane (12) (13). The high density of diverse families along it would then have access to Regional Park programming. As with the Snelling buses, public transit to all parts of the

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metro can go where the riders are - White Bear, Maryland, English, Phalen Boulevard to BRT on 35E (5). We need both trails and public transit to compete with the suburbs for business and homeowners and prevent urban sprawl.

5. Volunteer homeowner's yards can be a permeable corridor (2) related to

one of the major corridors. A discount can be given on sewer bills for people who participate since less water runs into sewers. Audubon has an

App and booklet to help people find the best plants for their yard.

6. A Park Ranger can float among the corridors and block clubs with the goal of educating diverse and young populations (13). Audubon members can help with bird watching programs.

7. Assign a DNR school forest to each metro school and a coordinator. The Big Urban Woods is a school forest for three schools. Audubon chapters are already organized to help schools but this way have a woods to learn in.

8. Audubon can use 70 years of metro Christmas Bird Count Data and eBird data to pick declining species to enhance the wildlife corridors for. (14) Otherwise migrant warblers, ducks, Grackles, Woodpeckers, Owls, Kingbirds and Hawks will lose their urban stop-over points and homes.

9. Ramsey County has reached the maximum amount of water new development can put down storm drains (15). The new storm ponds taking the place of sewers can be maintained for native plants, frogs, woodchucks, and with standing water become stop overs and hotspots for birds.

10. The State of Minnesota can work with the Minnesota Soybean Association (16) and cities to come up with a plan to remove Buckthorn. Soybean aphids overwinter in our Buckthorn then fly south and eat soybean leaves, so farmers have to spray pesticides. North Saint Paul has removed all its Buckthorn (17) and other cities can too.

11. Nectar and milkweed plants for Monarchs and native plants for migrating birds can be put on and near Highway 35E, an official Monarch (18) highway, and other urban roadsides. Highways connect with Minnesota and Mississippi flyway Birding Trails (19).

12. We could plan to maintain our many railroad corridors as good natural areas for hawks, turkeys and other grassland birds. Otherwise oaks and prairies still there from when the wheels set the corridors on fire (3) go away.

#### CONCLUSION

The recent designation of the Rusty Patched Bumble Bee as Endangered and finding the majority of them in the Metro areas presents some good

luck and challenges to us as we try to protect them and bring them back from the brink of extinction. And in doing so we can set an example of how to live within nature so other species don't become endangered. As an urban area we have a chance to bring our diverse greenspaces (Railroads, Cemeteries, Storm Ponds, yards) back up in quality as they were in their original state. This mindset and public input needs to be in place at the beginning building projects and as we maintain our green spaces.

We are lucky to have gambling and sales tax money for natural area enhancement. But thanks to the work of birds and other plants, insects and animals Wildlife Corridors pay for themselves. The top predator Hawks and Owls keep rodents in check. Chimney Swifts eat mosquitos. Native plants direct water down their roots and reduce flooding and replenish Aquifers. Pollinators and birds spread natural areas and keep them healthy for free. Well-kept green spaces in all neighborhoods encourage private dollars to recycle neighborhood housing. Local wildlife corridors allow households to enjoy nature without paying for a trip up north. In a lot of ways natural areas pay for themselves. Local urban corridors with interpretive programs for families will allow more diverse populations and young people to learn about and experience natural areas in their own neighborhood. They will grow up knowing how to support natural areas state-wide. And we will be living within and not instead of nature. (See Rusty Patch, Saint Paul planning maps and MeCC corridor map below)

Kathy Sidles, Saint Paul Audubon member, Saint Paul Parks volunteer  
kesid@aol.com 651-771-7528 (evening)

(1) Big Urban Woods website:

<https://sites.google.com/site/bigurbanwoods/home>

(2) Portland, Oregon Wildlife Corridor Plan:

[https://www.researchgate.net/publication/265085554\\_Wildlife\\_corridors\\_and\\_permeability\\_-\\_a\\_literature\\_review](https://www.researchgate.net/publication/265085554_Wildlife_corridors_and_permeability_-_a_literature_review)

(3) Trains wheels setting right-of-way on fire, studies of native plants in right-of-ways (notice Ramsey County rail right-of-ways have never been studied):

<file:///C:/Conservation%20Committee/Minnesota%20Railroad%20Right%20of%20Ways.pdf>

(4) Saint Paul Land Use draft plan:

<https://www.stpaul.gov/departments/planning-economicdevelopment/planning/2040-comprehensive-planning/land-use-chapter>

(5) Rush Line dedicated busway web site, and alternative Rapid Bus Lines:

[www.rushline.org](http://www.rushline.org) and <http://www.startribune.com/more-rapid-bus-lines-planned-for-twin-cities/474438883/>

(6) Minnesota Wildlife Corridor maps:

[file:///C:/Conservation%20Committee/MN\\_BirdCorridorsMap040611.pdf](file:///C:/Conservation%20Committee/MN_BirdCorridorsMap040611.pdf)

<file:///C:/Users/KathyS/AppData/Local/Microsoft/Windows/INetCach>



## 2040 Comprehensive Plan

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e/IE/E  
EO3Q2MT/Metro\_Greenways\_Seven-  
County\_Twin\_Cities\_Region,\_Minnesota%20(1).pdf Figure 6  
(7) Web site with estimate of gambling and sales tax money  
Environmental  
Trust Fund (lottery funds) \$35.3 million Trust Fund, \$13.3 million Game  
and  
Fish, \$13.3 million Natural Resources, total \$62 million each year:  
file:///C:/Conservation%20Committee/Annual-Report-  
FY17%20lottery.pdf  
Outdoor Heritage Fund 33% estimated at \$80 million, 14.25% parks and  
trails, 33% clean water total ~\$195 million each year:  
<http://www.legacy.leg.mn/about-funds>  
(8) MeCC web site, urban corridor dollars and acres being lost:  
<http://www.dnr.state.mn.us/metroconservationcorridors/index.html>  
(9) Sales tax and gambling goals web site:  
[http://files.dnr.state.mn.us/assistance/nrplanning/community/nrplanni  
ng\\_gui  
de/handbook.pdf](http://files.dnr.state.mn.us/assistance/nrplanning/community/nrplanni<br/>ng_gui<br/>de/handbook.pdf)  
(10) Concentration of school aged kids:  
<https://mn.gov/admin/demography/data-by-topic/children-families/>  
(11) MeCC plans for neighborhoods along corridors:  
<http://www.dnr.state.mn.us/maps/mecc/mapper.html>  
(12) Example of an urban wildlife regional park and trail in Saint Paul:  
<https://www.trailink.com/trail/samuel-h-morgan-regional-trail/>  
(13) Gateway/Browns Creek is assigned a DNR Naturalist (see  
Directors):  
<http://gatewaybrownscreektrail.org/>  
(14) eBird and Christmas Bird Count data: [www.ebird.org](http://www.ebird.org) and  
[http://netapp.audubon.org/CBCObservation/Historical/ResultsBySpeci  
es.aspx?1](http://netapp.audubon.org/CBCObservation/Historical/ResultsBySpeci<br/>es.aspx?1)  
(15) Ramsey County and Saint Paul storm water runoff reduction plans:  
[https://www.minnpost.com/line/2016/12/rain-resource-st-paul-  
innovatesshared-sustainable-stormwater-management](https://www.minnpost.com/line/2016/12/rain-resource-st-paul-<br/>innovatesshared-sustainable-stormwater-management)  
<https://www.rwmwd.org/explore/management-plan/>  
(16) Soybean aphids overwinter on Buckthorn, Soybean Association:  
[https://www.extension.umn.edu/agriculture/soybean/pest/soybean-  
aphid/](https://www.extension.umn.edu/agriculture/soybean/pest/soybean-<br/>aphid/)  
<https://mnsoybean.org/msga/>  
(17) North Saint Paul Buckthorn City Code - Buckthorn must be  
removed:  
[http://library.amlegal.com/nxt/gateway.dll/Minnesota/north\\_saint\\_pau  
l/cityo  
fnorthsaintpaulminnesotacodeofordin?f=templates\\$fn=default.htm\\$3.0  
\\$vid=a\\_mlegal:northstpaul\\_mn](http://library.amlegal.com/nxt/gateway.dll/Minnesota/north_saint_pau<br/>l/cityo<br/>fnorthsaintpaulminnesotacodeofordin?f=templates$fn=default.htm$3.0<br/>$vid=a_mlegal:northstpaul_mn)  
(18) 35E Monarch Highway, and roadsides for wildlife:  
[http://blog.nwf.org/2017/06/interstate-35-monarch-butterfly-  
highway/](http://blog.nwf.org/2017/06/interstate-35-monarch-butterfly-<br/>highway/)  
<https://www.wired.com/2015/04/roadside-utility-corridor-habitat/>  
(19) Bird Migration Highways:  
[https://www.birdwatchersdigest.com/bwdsite/explore/travel/birdingfly  
ways.  
Php](https://www.birdwatchersdigest.com/bwdsite/explore/travel/birdingfly<br/>ways.<br/>Php)

(20) Rusty-Patched Critical Areas in the Twin Cities, and threatened and  
endangered species in Ramsey County:  
[https://www.fws.gov/midwest/endangered/insects/rpbb/rpbbmap.htm  
l](https://www.fws.gov/midwest/endangered/insects/rpbb/rpbbmap.htm<br/>l)

<https://www.fws.gov/midwest/endangered/lists/minnesot-cty.html>

<https://www.dnr.state.mn.us/eco/mcbs/maps.html>

(21) See Rusty Patched Bumble Bee sightings by year here:

<https://www.bumblebeewatch.org/app/#/bees/map>

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## Stuart and Mary Ellen Knappmiller

inside Ward 6

January 14, 2019, 3:50 PM

### Question 1

Stuart Knappmiller

### Question 2

1112 Orange Ave. E.

### Question 3

Russ' Resiliency work has to be here. We face our greatest emergency  
ever, not for me because I will be dead, but certainly for our  
granddaughters, in climate change. How I will heat my home in a decade  
or less. I can't buy a more efficient furnace than we have. What's our plan?  
We use 4 ceiling fans when we are in a room that needs cooling. We've  
spent months in SE Asia and South America so we know we can live with  
our central air off all summer. We have solar on our roof for electricity. We  
need safe usable commuter bike lanes from our Payne Phalen  
neighborhood to the Ford Plant development, to the Greenway, to the  
State Fair, to White Bear Lake, downtown MPLS, Wisconsin, to Cottage  
Grove, Eagan. We need the Ped Plan and bike plan to be implemented  
well. With Ramsey County's help we need more and more streets made  
traffic predictable like has been done on our section of Maryland Ave. We  
need roundabouts to replace as many dangerous intersections as can be.  
We need to put the same amount of money into SPPS that was there in  
the 80's and 90's when Melvin and our children were in our schools. We  
need affordable housing and an increase in density and better transit. Our  
corridors should have apartments with first floor businesses that people  
will use, not the development at the intersection of Arcade and Maryland  
where a one story building stands mostly empty because there isn't  
enough slow car traffic/foot traffic/bike traffic to support a bike shop,  
etc. These buildings need to be LEED certified with rain capture for  
graywater use and solar on the roof. My wife and I need clear sidewalks to  
walk the mile plus to Mississippi Market or to businesses on Payne, as you

## 2040 Comprehensive Plan

### 2040 Comprehensive Plan Public Feedback

can't afford to have us drive a combustion engine car and we don't want to use the bus as it doesn't get us the exercise that will keep us paying taxes for several more decades. We need to tap into our elders - 2,000 live in the PPCC area -to help children walk SRTS, tutor in schools, volunteer in our rec centers, for our police and firefighters. We must find a way to convince the "taxpayers" that they are citizens. That this city is our city. We need to connect as citizens to make our parks and water and homes and businesses places of vibrancy, especially because our daughter in law says she fits in better walking at Phalen than her Euro-American in laws do. Listen to the young people, not those of us who are dying out. But don't let the ignorance from social media guide our city. Keep meeting with citizens and reaching out to us, until we understand we're all in this together.

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#### **Name not available**

January 14, 2019, 3:52 PM

#### **Question 1**

Jack Byers, Executive Director, Payne-Phalen Community Council

#### **Question 2**

567 Payne Avenue, Saint Paul, MN 55130

#### **Question 3**

No response





January 9, 2019

Mayor Melvin Carter  
Saint Paul City Council  
Dr. Bruce Corrie, Planning and Economic Development

RE: City of Saint Paul 2040 Comprehensive Plan

The Center for Economic Inclusion (the Center) appreciates the opportunity to comment on the draft City of Saint Paul 2040 Comprehensive Plan, Saint Paul for All. As an organization dedicated exclusively to advancing inclusive growth to achieve regional prosperity, the Center has urged all cities in the metropolitan area to advance a racially equitable economy through their comprehensive plans. To maximize impact, the Center is submitting specific comments on the draft plans of the five metro area cities with the highest shares of people of color.

The Center advocates that all municipalities incorporate the following elements into their comprehensive plans:

1. **A goal** to develop a racially equitable economy;
2. **Data analysis**, consistently disaggregated by race, to identify racial disparities in access to affordable housing, transit, living wage jobs and economic development;
3. **Policies and strategies** specifically designed to close the identified racial disparities;
4. A commitment to **evaluating** the impact of these policies and strategies on people of color, and to adapting those policies and strategies based on that evaluation.

We believe that we build inclusive economies by working at the intersection of human capital, economic development, transit and access, through the lens' of race, place and income, not by addressing them as independent focus areas. And, a plan is only as successful as the sustained, intentional investment of human, intellectual, social, and financial capital that is invested in letter and spirit. To that end, the Center stands ready to partner with policy makers to incorporate these elements into draft comprehensive plans and, more generally, into the way public agencies do business.

## SUMMARY COMMENTS

### *Goal*

Saint Paul for All includes “equity” in three of its foundational statements:

1. As one of the eight “challenges and opportunities for the future.” Specifically, the plan states “how we grow, develop and invest over the next 20 years must be done in a way that reduces disparities in jobs, income, housing cost burden, education and home ownership.”

2. “Livability, equity and sustainability” was one of nine themes identified through the community engagement process.
3. “Equity and Opportunity” is one of ten core values that inform the vision. “We are a city where opportunities in education, employment, housing, health and safety are equitably distributed and not determined by race, gender identify, sexual orientation or age; we are a city that creates opportunities for all residents to achieve their highest potential.”

It is significant that the City of Saint Paul has recognized equity as a challenge and opportunity, a theme, and a core value in the draft plan. The Center encourages the comprehensive plan to go further by including a specific goal for creating a more racially equitable economy. It is important to have a goal because it helps to focus policies, drive implementation and structure accountability through evaluation. One of the places the draft comprehensive plan could include such a goal is among the other goals in the Land Use chapter on page 28. Additionally, the policies in that chapter that support the economic inclusion goal could be organized under it (as is done in other chapters).

### ***Data***

Saint Paul for All contains some disaggregation of data by race, especially in the housing chapter. Also, the mapping of the “Area of Concentrated Poverty with 50% or More of People of Color” (ACP50) in relation to other data visually demonstrates how race, income, and geography coincide with poverty, homeownership, and education.

The Center encourages the City to expand these analyses by:

- Providing more disaggregated data on economic inclusion, including: labor force participation, unemployment, educational attainment and others.
- Disaggregating the data by specific racial groups, rather than simply by People of Color versus whites.
- Undertaking more detailed analysis when ACP50s is used as a planning and investment tool.
- Grounding the plan’s policies in data analysis.

Our data shows that disaggregated data is required to ensure intentional goal setting, equitable investment and measurable progress, and every effort should be taken to maintain constant awareness of the data that is readily available.

### ***Policies***

Saint Paul for All contains many policies that seek to advance racial equity and economic inclusion. The Center encourages the City to build upon this approach by:

- Applying equity analyses and policies more evenly and systematically throughout the plan.
- Providing more specificity on how racial equity applies to certain policy areas.
- Connecting equity-related policies to goals, actions, resources and measures.

To more effectively bridge vision and execution, the Center suggests that the City provide more detail in the implementation chapter of the plan. In particular, the land use implementation section would be strengthened by:

- Connecting each implementation action to the comprehensive plan policies and goals it advances.

- Identifying potential indicators for measuring the success of each action.

### *Evaluation*

Saint Paul for All includes several specific policies that include the use of an equity lens. The Center encourages the City to broaden the application of an equity lens to the implementation and evaluation of all city programs and decisions.

## ADDITIONAL COMMENTS

### *Data*

The Center supports the disaggregation of data by race in the plan. For example, in the Introduction (page 7), the plan outlines some of the disparities based on race:

“Saint Paul residents are experiencing significant gaps in education, income, employment and home ownership. In 2014, 52% of whites age 25 and older had a bachelor’s degree or higher, while only 19% of people of color were in this category. While labor participation is nearly equal between whites and people of color (72% and 68% respectively), the per capita income for whites in 2014 was three times that of people of color (\$39,344 vs \$13,856). In 2014, there was a 33% gap in homeownership between white residents and people of color (61% vs 28%, respectively).”

The plan continues by identifying the “Area of Concentrated Poverty with 50% or More of People of Color” (ACP50) in Saint Paul. Furthermore, policy LU-3 states that the City will “prioritize public investments relative to areas of concentrated poverty.” The plan notes that Saint Paul’s ACP50 “shows a concentration of the highest percentages by block group of carless households, families living in poverty, non-English-speaking households, severely cost-burdened households, and populations 25 years and older with no bachelor’s degree. The ACP50 area also exhibits the lowest high school graduation rates in Saint Paul.”

The Center supports this disaggregation of data by race, and the geographic analysis based on ACP50s. By overlaying the ACP50 map on all the data in Appendix A, one can clearly see how race, income and geography coincide with poverty, homeownership, and education. This visualization is effective in demonstrating the relationships between these factors.

However, as a planning and investment tool, ACP50s have their limitations. Originally conceived by the Metropolitan Council for region-level analysis, ACPs and ACP50s can mask a great deal of nuance when applied to the neighborhood and city levels. For one, ACP50s take attention away from disadvantaged residents in other parts of the city. Also, ACP50s are not monolithic and contain high-wealth communities and individuals within them. Finally, because the ACP50 covers a large portion of Saint Paul, it is not especially helpful in focusing resources.

The Center encourages the City to build upon the ACP50 analysis with a more in-depth analysis that disaggregates data by race city-wide (and by smaller geography, as needed). While the Introduction cites the homeownership gap between whites and People of Color (POC), the Center encourages the City to break down the broad category of POC into more specific racial categories, as the data allows. One place to start would be to disaggregate the data mapped in Appendix A to the Introduction by race, such as poverty and homeownership (similar to how the housing chapter breaks down housing cost burden and homelessness by race).

The data analysis in the housing chapter of the plan is detailed and comprehensive. The Center encourages the City to provide additional data on the current state of economic inclusion in Saint Paul in the plan, and to disaggregate this data by race. Example data sets for this analysis might include: labor force participation, unemployment, mapping of jobs in relation to communities of color, mapping of jobs in relation to transit accessibility, median household income, poverty level, high school graduation (and other educational attainment) and business ownership.

In addition to disaggregating the data in the plan, the Center encourages the City to further ground the plan's policies in data. For example, policy LU-4 seeks to minimize displacement in redevelopment areas with high-frequency transit. What specific areas are these, and how do we know? What measures are used to identify displacement risk, and what does the data tell us about those areas?

### ***Policies***

Saint Paul for All weaves the theme of social and racial equity throughout much of the plan. The Center encourages the City to strengthen this approach by:

- Applying equity analyses and policies more evenly and systematically throughout the plan.
- Providing more specificity on how racial equity applies to certain policy areas.
- Connecting equity-related policies to goals, actions, resources and measures.

Policy WR-9 provides a positive example of this approach: "Apply an equity lens to policy and funding decisions relating to providing assistance to or coordinating with owners to improve private water connections to the public distribution system." This policy effectively states how an equity lens will be applied to an aspect of water resources. Other areas of the plan, most notably the housing chapter, also provide a high level of detail about how the policies will foster equity. The Center encourages the City to include a similar level of specificity on how an equity lens will be applied to other areas of economic inclusion.

For example, Policy LU-6 states "Foster equitable and sustainable economic growth by:

1. facilitating business creation, attraction, retention and expansion;
2. supporting family-sustaining jobs and enhancing workers' skills to excel at those jobs;
3. growing Saint Paul's tax base in order to maintain and expand City services, amenities and infrastructure;
4. proactively directing new development to high-priority geographies, such as Neighborhood Nodes, ACP50 Areas and Opportunity Sites;
5. encouraging cultural and arts-based businesses and business districts, such as Little Mekong, Little Africa, Rondo and the Creative Enterprise Zone;
6. supporting business, real estate and financial models that keep more money locally, such as locally-owned businesses, local-prioritized employment, employee-owned businesses and commercial land trusts;
7. building and expanding neighborhood economic and cultural assets through the development of the local micro-economies of our Neighborhood Nodes;
8. enhancing vibrant downtown neighborhoods and connecting them to the Mississippi River;
9. developing programs and funding sources for site acquisition and parcel assembly; and
10. integrating Saint Paul's historic resources into neighborhood-based economic development strategies."

How will these actions foster and sustain equitable economic growth? How will the City apply an equity lens to this policy? Which of the seven goals in the land use chapter does this policy support? Which of these actions will be focused on communities of color? Which ones will be applied evenly, city-wide? The Center encourages the City to expand upon this policy with a more detailed discussion of how it will advance equity and economic inclusion.

Policy PR-12 states “Ensure Parks and Recreation staff reflect the demographic diversity of a dynamic city to better inform decisions regarding operations and facilities.” The Center applauds this policy and agrees that greater diversity can create more inclusive decisions. But why limit this policy to Parks and Recreation staff rather than all city departments? Also, why not seek to match staff diversity to that of the City of Saint Paul (rather than “a dynamic city”)? A revised policy might read: “Ensure all City of Saint Paul staff reflect the demographic diversity of the city to better inform decisions.”

Policy H-20 states “Collaborate to reduce racial disparities in homeownership that could be attributed to unequal access to fair lending or intentional steering to specific neighborhoods.” The Center applauds the City for this policy to reduce racial disparities in homeownership. However, it is not clear why it limits City action to disparities that are based on unequal access to lending or intentional steering to specific neighborhoods. Are there data to show that these are the primary drivers of the homeownership gap? What role does the difference in generational wealth play?

Policy H-56 states “Improve the stability and health of communities of concentrated disadvantage by implementing place-based investments, such as public infrastructure, improvements and maintenance.” The Center encourages the City to clarify this policy. What does “concentrated disadvantage” refer to? How does it relate to the ACP50? If H-56 is referring to a similar geographic area, how does this policy differ from LU-3? The Center encourages the city to clarify the relationship between these policies.

### ***Evaluation and Implementation***

Saint Paul for All includes several commitments to use an equity lens in decision-making and evaluation, including:

- “Apply an equity lens to policy and funding decisions relating to providing assistance to or coordinating with owners to improve private water connections to the public distribution system” (WR-9).
- “Consider a process to further evaluate and monitor equitable distribution of community amenities.” (Item 11 in the Land Use Chapter implementation table).

The Center encourages the City to broaden the application of an equity lens to the implementation and evaluation of all city programs and decisions.

The Center also encourages the City to provide more detail in the implementation section of the plan, especially regarding the policies that seek to advance economic inclusion. The introduction to the implementation chapter includes the following among ten “general implementation” actions: “implement and regularly update the City’s Racial Equity Plan to realize and measure equity-related goals and policies.” Also, the land use chapter implementation table includes “Implement Economic Development Strategy.” How do the racial equity plan and economic development strategy work together to implement comprehensive plan policies? Where do their goals, strategies and measures overlap and diverge? Given the reality of limited resources, what among these plans and strategies will be prioritized in the near term?

To clarify these questions, the Center suggests that the City include a more detailed implementation matrix in the plan's land use section. Currently, it includes a list of actions, their timelines (short-, medium- or long-term) and a list of potential funding sources. The Center encourages the City to enhance this section by:

- Connecting each implementation action to the comprehensive plan policies and goals it advances.
  - Identifying potential indicators for measuring the success of each action.
- 

The City of Saint Paul has demonstrated a clear and compelling commitment to racial equity, and a platform for accelerating equitable growth. We applaud this plan for its articulation of racial equity goals and policies, and linkages to the resources needed to fulfill those goals. By providing a more detailed implementation section, the City can better articulate how the equity goals and policies in the plan will advance measurable changes in toward economic inclusion in Saint Paul.

### **About the Center for Economic Inclusion**

The Center for Economic Inclusion is the nation's first organization dedicated exclusively to advancing inclusive growth to achieve regional prosperity. By elevating data-driven promising practices, advocating for inclusive policies, coordinating cross-sector, community-driven development, and piloting strategies that truly close racial and economic gaps, we partner across communities and sectors to shape a Minneapolis-Saint Paul regional economy that works for everyone. We can unlock our region's potential by connecting people, jobs, and opportunity through housing and transit, entrepreneurship and investment, and fair wages and talent development. To do so, the Center connects communities excluded by Race, Place, and Income with cross-sector leaders to cooperatively design an inclusive and exciting new blueprint for growth that leverages both market forces and our region's diversity.

We understand the role you play in shaping local and regional prosperity and an excellent quality of life. We're eager to partner with you to unlock our region's full potential and create a region that thrives because of our diversity not in spite of it. Together, we *can* create an economy that works for everyone.

Thank you for your leadership and your consideration,



Tawanna A. Black  
Founder & CEO, Center for Economic Inclusion



January 10, 2019

Comments on the Saint Paul 2040 Comprehensive Plan

Luis Pereira

Planning Director [luis.pereira@ci.stpaul.mn.us](mailto:luis.pereira@ci.stpaul.mn.us)

Sonja Butler

Planning Commission Secretary [sonja.butler@ci.stpaul.mn.us](mailto:sonja.butler@ci.stpaul.mn.us)

To Whom it Concerns;

On behalf of the board of directors of the Creative Enterprise Zone (both a 501c3 organization and a designated place), I offer the following comments acknowledging Saint Paul's 2040 Plan and the work it represents.

The Creative Enterprise Zone (CEZ), formally recognized by the City's Planning Commission in April 2013 as a special business development district serves to highlight the naturally occurring and intentional relationship between people, place, built environment, and economic development. The vibrant ecosystem of industry and entrepreneurial startups produces a creative economy within the CEZ boundaries that provides essential economic power for the city of Saint Paul and adjacent cities. The Creative Enterprise Zone is the second largest employment center for the city, and the number one source of tax base, both crucial metrics. (See attached info graphic). The board of the Creative Enterprise Zone organization supports many of the elements in the 2040 Comp Plan and also supports comments offered by the SAPCC and Towerside organizations.

Our focus is on the real and urgent threat to the stability of the area that must be addressed through a combination of land use, zoning, public investment, and civic engagement. We have heard a Chicago based developer indicate that the CEZ is the "last real value in the entire country for real estate development." The pace of real estate sales for current building stock, the rate of development—commercial and community including increased households—shows that transit produces transformative development for a region. We acknowledge that increased density, mixed uses, and the pressure of displacement will continue to define the area.

P.O. Box 14252

2334 University Avenue W.

Saint Paul, MN 55114

[info@creativeenterprisezone.org](mailto:info@creativeenterprisezone.org)



In 2018 CEZ commissioned a study to identify the numbers and types of creative businesses operating in the Zone. The study (attached) found more than 300 creative businesses inhabiting a range of spaces with varying sizes and scales of operation. The study highlights the way creative and entrepreneurial economic development needs policies and investments to transition to the next stage of growth and continue to thrive as a vehicle for enterprise, jobs and job creation, creativity, and innovation. This grows more urgent each day as buildings are sold and redeveloped to lower standards and businesses decide where they will chose to operate.

The local, regional, and global economy is rapidly changing and maker spaces are an opportunity to incubate one of the fastest growing local sectors, creative businesses. These artisans, crafts, manufacturers, and tech prototyping companies help create a more diversified and resilience local economic ecosystem for the city, region and state.

Maker spaces strengthen the economic ecosystem through the bridge they create between higher education and industry, a crucial gap that needs to be addressed for talent retention and introducing new career paths in industrial sectors. Maker spaces are also a gateway to entrepreneurship and skill development, growing skills for Saint Paul citizens to enter high-paying industrial jobs – but also to create wealth and local ownership of businesses.

Fostering the businesses that cluster in and around maker spaces will create transition users between niche and traditional industrial jobs, grow skills starting at earlier ages, and produce spin-off and supporting businesses needed by traditional and nontraditional industry alike. Ultimately maker spaces stand for an equitable approach to industrial economic development. They provide an enabling environment for manufacturing businesses creating middle-class jobs and partner with the local community to ensure access to those opportunities.

We support the recommendations offered in the Towerside letter of comments suggesting two additions to the plan including City of Saint Paul’s Resolution 15-1399 (Aug. 5, 2015), which supported the establishment of the University Avenue Innovation District, now known as Towerside Innovation District, and encouraged Saint Paul’s Planning and Economic Development Department and other city staff to participate in the partnership, supporting mutual efforts to create jobs, green space, and a cohesive district identity and brand.

The Towerside suggestions echo Saint Anthony Park Community Council’s comments regarding the desired redevelopment of industrial areas and the need to include action steps similar to those set out in *Policy 3: “Production and Processing”* and *Policy 98: “Innovation Districts”* of the Minneapolis Comprehensive Plan.



The proposed ten-year plan for Saint Anthony Park calls for a new zoning overlay district across Towerside Innovation District and the Creative Enterprise Zone to encourage a variety and density of uses. This would include flexible zoning that will promote businesses including 21<sup>st</sup> Century urban manufacturing, innovation centers, and creative, co-working, artisanal, and maker spaces. This would also facilitate opportunities for arts and creative spaces, cultural hubs, as well as live/work arrangements in appropriate circumstances. We urge increased requirements for district systems that conserve our resources (water, energy) and renovate and build to highest and flexible uses including solar and other renewable energies, district systems, and building with an eye toward adaptability.

Items 17 and 18 in Figure I-1 of the Implementation Chapter in the Comprehensive Plan call for studies over a 5-10 year period, but we urge Saint Paul to consider a more expedient timeline. Indeed, we want to work together to immediately apply what we already know. Market demand for standard development projects is rapidly growing, and the vast majority of these projects do not help move the needle on the City of Saint Paul's core values of resilience, climate protection, and equity.

Thank you for the opportunity to comment on the plan. We look forward to continuing to work with you on it into the next decade.

Respectfully submitted,

Catherine Reid Day, Board Chair, Creative Enterprise Zone organization  
on behalf of our board and partners.

January 10, 2019

Re: Comprehensive Plan 2040

Friends of the Parks and Trails of St. Paul and Ramsey County, a local non-profit membership organization, was established in 1985 when a development was proposed for Crosby Farm Regional Park. A group of concerned citizens banded together to speak on behalf of our priceless parks, trails and open spaces.

The introduction to the Parks, Recreation, and Open Space Chapter of the 2040 Comprehensive Plan draft states, “The Saint Paul park system comprises a large, diverse and vibrant network of people, spaces and facilities that is recognized by Saint Paul residents as one of the city’s great shared assets.”

It goes on to say that, “Park facilities and programs improve the quality of life... foster public health...serve an important role for the city’s youth by providing safe and healthy places and activities...connect us to the Mississippi River and lakes... and are an important component of sustainable economic development, drawing and retaining residents, increasing nearby property values and attracting businesses.” We couldn’t agree more.

We appreciate and applaud the recognition this draft gives to not only the environmental benefits of parks, recreation, and open spaces, which are more intuitively acknowledged, but also the economic, social, and health benefits they provide. **Parks are fundamental building blocks when seeking environmental and economic sustainability**, one of the five goals guiding the Parks, Recreation and Open Space Chapter.

We recognize this draft was composed with the intention of being a more high-level document than previous iterations. Bearing that in mind, we strongly encourage incorporating language into the Parks, Recreation, and Open Space Chapter that reiterates the **importance of community input in development planning and vigilantly maintaining public access throughout the system.**

**It is important that mention be made of the No Net Loss Provision in the Saint Paul City Charter.** This provision is highly relevant to all development decisions involving our park system and yet there is no reference to it.

There is currently no official map of the city's parkland, making the goals of maintenance and asset management particularly challenging. **We recommend the city make mapping parkland a priority.**

**The current Comprehensive Plan calls for a parkland zoning designation.**

That designation has yet to occur. When reviewing the six Focus Areas of the entire Comprehensive Plan draft (equitable cities, aging in community, community/public health, economic development, resiliency, and urban design) parkland zoning would be a tool to help achieve them.

There is no mention in the draft of the **Parkland Dedication Ordinance**. While we recognize this is a high-level document, given the goals of the plan and the value statements, and knowing it will be referenced when making funding and development decisions, it may be helpful to make note of this valuable tool that can help us reach the desired outcomes of resiliency and sustainability.

Specific item notes on the Parks, Recreation and Open Space Chapter: **red text** indicates additional suggested language and ~~strikethrough~~ indicates suggested text removal.

**Policy PR-1.** Ensure equitable access to Parks and Recreation programs, resources and amenities **including, but not limited to, racial, ethnic, income, ability, and geographic diversity.** (The goal is that the users of the system are reflective of the population, not solely addressing physical access to parks but actual equity of use and opportunity. This also relates to **PR-4**.)

**Policy PR-9.** Use **systematically-collected** customer and resident feedback on needs, satisfaction and trends to improve park experience and bring in new users. (We make this recommendation to clarify between systematically collecting valuable feedback on which to make important decisions versus relying on a complaint-based system. Too often, when systems are based on complaints, it's the "squeaky wheel that gets the grease" and those that don't realize the necessity of speaking up or feel uncomfortable doing so are left behind.)

**Policy PR-10.** Embrace and integrate emerging cultural and recreation trends, particularly those that meet the recreational needs of youth, underserved populations and emerging resident groups. (How will these trends be determined?)

**Policy PR-24.** Develop shared-use facilities as a first option when contemplating new or replacement indoor recreation facilities **while recognizing the importance of maintaining public access**. (Privatization of public facilities doesn't seem to be the goal here so it's important for that to be put in writing somehow.)

**Policy PR-26.** Use data-driven evaluation of **all** park assets to develop a maintenance and replacement schedule, and plan for future budgetary needs. (We recognize the 2017 Ameresco report regarding capital assets, but this will be difficult to accomplish without comprehensive and accurate mapping of all parkland resources. The city needs to prepare accurate boundaries of parkland within the city to be able to accurately monitor those resources, thus our recommendation to make such mapping a priority.)

**Policy PR-29.** Seek out partnerships with private entities to finance capital and maintenance costs of Parks and Recreation facilities without compromising good design solutions, **reducing public access** or over-commercializing the public realm.

**Policy PR-34.** Prioritize safety and equity when filling gaps in the trail and bikeway system to ensure seamless connections throughout the city for pedestrians and bicyclists of all ages and abilities. (How will equity be used in this way? What approach will be used to evaluate?)

**Policy PR-40.** Provide consistent wayfinding signage in each project or park so that it is recognizable as part of the broader City system **while being cognizant of the negative impacts of signage in natural areas**.

**Policy PR-41.** Involve staff from the Department of Parks and Recreation **and park and community advocacy groups from the beginning in the early stages** of discussions regarding large-scale land redevelopment sites. (We acknowledge staff plays an important role when meeting with developers at the beginning of projects and we certainly don't intend for this to be an interference with that. However, we believe it is reasonable that the public should be involved in the early stages of large-scale developments and not just after potential uses have been whittled down to certain choices.)

**Policy PR-42.** Address physical park encroachments that impair use through effective parkland management and protection. (Accurate mapping of existing parkland is required so that this can be done. It is not possible without it.)

We thank you for this opportunity to comment and congratulate city staff on the extensive community engagement and outreach they have undertaken throughout this process. As an organization made up of community members, we recognize the importance of actively engaging with our fellow citizens.

We encourage this philosophy of citizen engagement as the city refers to the Comprehensive Plan to 2040 and beyond. As it was done in the creation of the document, we hope, too, it will continue in the implementation, calling for robust stakeholder involvement and identifying the importance of social capital while upholding the Core Values throughout all the Focus Areas and Topic Chapters.

Sincerely,

Shirley Erstad  
Executive Director