

**From:** Jake Rueter [mailto:jake.rueter@gmail.com]  
**Sent:** Sunday, December 16, 2018 10:01 AM  
**To:** #CI-StPaul\_Ward4; Dadlez, Kady (CI-StPaul)  
**Subject:** Support for Eliminating Parking Minimums

Dear Planning Commissioners and CM Nelson,

I'm writing today to ask that you please use St. Paul's 2040 comprehensive plan update as an opportunity to eliminate parking minimums in our city. I believe that it is critical to allow people investing in our city to determine the amount of parking they need independently. This is an important issue for people considering building ADUs, those investing in small businesses, and building larger housing developments.

We need to reduce barriers to building more opportunity in our city and shift away from our existing car-dominant transportation system.

Thank you for considering my comments.

Jake Rueter  
1347 Blair Ave

From: James Slegers [mailto:james.slegers@gmail.com]  
Sent: Tuesday, January 08, 2019 10:42 PM  
To: Thompson, Lucy (CI-StPaul)  
Cc: #CI-StPaul\_Ward2  
Subject: St Paul 2040 Comments

StP Planning and Econ Development, Lucy Thompson, and Council Member Noeker,

As you consider the long term plan for the city of St Paul, I ask you to commit to inclusive zoning policies that enable long term population growth and broader housing choice while eliminating policies that hinder the pursuit of carbon footprint reduction.

The vast majority of the city of St Paul is zoned single family at present. This de facto limits housing density and housing choice in 90% of the city. Given the already slim unit availability in the city and the long term expectation of population growth, we should be upzoning all parts of St Paul, to accommodate diverse types of new construction and renovation wherever it is needed. Broad upzoning not only enables population growth, but also decreases housing costs in the long term. Broad upzoning supports the policy goal of equity and equal accessibility by increasing the housing options of those who wish to live in those communities.

We should eliminate parking minimums and either eliminate permit-only parking or increase the cost to market rate. Parking minimums encourage wasteful land use and limit density. Undercharging for permit parking subsidizes individual vehicle use, and both these policies reduce the available tax base. Further, parking minimums and subsidization of parking contribute to sprawl and make neighborhoods less accessible to those who are unable to afford a vehicle. We should encourage density and reduce reliance on cars, both to reduce regional carbon footprint and to make our city more accessible and usable to people of all means. Greater density increases the efficiency and effectiveness of mass transit, as well as making walking and biking more viable alternatives.

Specific proposals:

1. LU-7 should be defined more precisely. We should follow the lead of Minneapolis in explicitly allowing multi-family housing in all residential areas and eliminating parking minimums. Similarly, LU-33 should not just encourage but "Allow by right"
2. LU-11 and LU-28 should be eliminated. There are no good policy reasons to subject proposed developments or renovations to these kinds of subjective standards which are frequently used to oppose new units and restrict what people can become part of a neighborhood. Historic designations should be limited to specific houses and not entire neighborhoods. Saddling whole blocks with 'historic' designations does little to serve the broader public, but it limits flexibility of development and limits the kinds of people who can afford to live in a neighborhood, which is counter to the equity goals of the city.
3. Add more Neighborhood Node locations in the Highland/MacGroveland/Summit Hill neighborhoods.
4. All of West 7th and the Riverview corridor, and along the A BRT line should be Neighborhood Nodes, as was done along the Green Line. Neighborhood Nodes should be expanded wherever BRT lines are developed.

Thank you for your consideration,  
James Slegers  
183 S Chatsworth St, Summit Hill (Ward 2)

James Slegers / [james.slegers@gmail.com](mailto:james.slegers@gmail.com) / (651) - 366 - 2410

**From:** Karen Allen [<mailto:kvalen01@gmail.com>]  
**Sent:** Sunday, January 13, 2019 8:37 PM  
**To:** Thompson, Lucy (CI-StPaul)  
**Subject:** Saint Paul for All - 2040 comments

Ms Thomspson,

I am sending you this email because the online submission portal for the 2040 plan is closed, despite the comment date being extended to Monday at 4.

I am a Saint Paul resident and landlord. I live in Hamline/Midway and own a duplex in Summit University. Saint Paul is the only city I ever want to live in, so I am sharing my notes on the 2040 Comprehensive Plan. I am very support of the broad up-zoning plans, the Neighborhood Node concept and increased focus on density and public transportation. Saint Paul is experiencing a housing shortage and dramatic increases in housing costs, making it challenging for current and future residents to have stable, long-term housing plans within our city. I hope that we can increase the abundance of housing and eliminate exclusionary zoning so that we can have more residents of diverse circumstances (age, race, employment, family status, education, etc) all contributing to a strong economic future for Saint Paul.

I am very supportive of the section about 'missing middle' housing. I see these types of buildings throughout the core of St Paul but know that there are many limitations preventing this type of development anymore - parking minimums, heights, set-back, funding, etc. Please make a concerted effort to eliminate these barriers, as I believe this type of housing would be most popular to many residents if they were given the option.

Where I different from a lot of housing advocates is that I believe that historic preservation is of critical importance to Saint Paul's long-term vitality. Studies have shown that historic neighborhoods have more flexible uses, at a lower cost, and typically support more diverse businesses and residents. Additionally, demolition and new buildings have a huge negative impact on the environment. I would encourage you to support historic preservation for community prosperity, encourage adaptive reuse and rehabilitation of existing structures.

The following notes were developed in tandem with a small gathering of other housing advocates, with a couple edits of my own.

Thank you for giving us a chance to work on Saint Pauls future together.

General:

- Given the expected population growth (344,100 by 2040), we need more explicit calculations about how much housing could be accommodated under the proposed new zoning rules. The large population growth calls for a broad upzoning of all parts of the city, to allow the flexibility to add housing when/where it is needed.
- Strongly agree that "the only way to grow is by increasing densities on infill parcels as they become available" (p. 8). Since the city cannot determine when or where this happens, we need a broad and dramatic relaxation of zoning.
- In addition to relaxing zoning to accommodate population growth, we should do it anyway because we need to lower the cost of housing as much as possible.

Nine Themes - p. 10

- In general objective, universal values like the affordability of housing and access to jobs should trump subjective, personal values like "sense of community". People without affordable housing options have no choice, 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.



#### Vision and Core City Values - p.12

- For all of these we must consider that impact, not only on current residents, but on potential future residents. What happens to people if we don't allow enough housing to be built to accommodate them?
- There is no meaningful "housing choice" when 90% of the city is zoned for one kind of housing (single family) and is required to provide one kind of transportation infrastructure (parking minimums). Real housing choice requires that we allow multi-family housing on every parcel and that no parcel be required to have a parking minimum.
- We 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.

#### Land Use - p.27

- Density should be increase throughout the city, not just at Neighborhood Nodes.
- LU-7 is too vague. The city should broadly upzone and allow multi-family housing without parking minimum throughout the city.
- LU-13 Change "reduce parking minimums" to "eliminate". Especially pertinent for small multi-family residences (duplex up to 'missing middle' style buildings)

#### Neighborhood Nodes Policy - p.33, Land Use Appendix A, Map LU-2 - p.41

- Clarify what this means they - not just "increased" maximum allowable density under the St. Paul code.
- Add more locations in Highland/Mac/Summit Hill.
- Similar to University, all of West 7<sup>th</sup>/Riverview corridor should be NNs. Same for the A Line Bus BRT. Anything along a train or BRT Route should automatically be NN.

#### Urban Neighborhood - Land Use Policy - p.34

- 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 NN.

#### Transportation - p.51

- Eliminate Permit Only Parking or at least charge a market rate for neighborhood permit holders.
- Autonomous vehicles are overhyped and we should not give over our transportation infrastructure to powerful corporations.

#### Housing - p.110

- 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 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. Again it is not true that the city has a "decades-old commitment to an all-incomes housing strategy". Instead the city has a policy of restricting the supply of housing to prevent low-income and people of color from building more affordable multi-family housing in much of the city.
- Goal 1:
  - Add Policy to to recognize that single family only zoning contributes to obesity and heart disease at the individual level and air pollution at the community level.
  - Delete H-7. This does not need to be a city priority.

- We need an explicit calculation of if we will meet the Affordability Housing Allocation.
- Goal 2: Add labor standards
- Goal 3: H-15-17 require broad upzoning without parking minimums
- Goal 7:
  - H-48: Strongly support. Clarify “small-scale multi-family”
  - Add policy to exempt all publically owned/subsidized housing from all zoning limits.

Thank you so much,  
Karen

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Karen Allen  
[LinkedIn](#)  
651-315-2262

**From:** Michael Sonn [<mailto:sonn.michael@gmail.com>]  
**Sent:** Monday, January 14, 2019 4:02 PM  
**To:** Thompson, Lucy (CI-StPaul)  
**Subject:** St Paul 2040

I'm writing as a citizen of St Paul concerned about the direction of our city and the future of the planet and how we can do better for both.

First and foremost, I'd like to see a much more ambitious plan. We should be talking about major investments in housing and bike/walk focused transportation. We should be discussing eliminating parking minimums city-wide. There should be dozens of more neighborhood nodes. There should be a blanket tri-plex allowance anywhere in the city, no matter the zoning. But sadly, this plan is ambitious only to those of us who know how slowly St Paul adapts.

Please take this opportunity to push our city and region forward in a sustainable way. We have to act fast and we have to act boldly. My son's future rests on your shoulders. Please look to those that have the most at stake in this discussion, the ones who will be living with your decisions in 2040. Change is hard, but it is coming for us and our city if we prepare for it or not.

Thank you,  
Mike Sonn  
1458 Wellesley Ave

### Land Use

- 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. Minneapolis has established a good model by allowing ADUs and triplexes citywide, and I believe that implementing a similar policy in Saint Paul would help grow the tax base without placing too much pressure on those who cannot afford the rent increases caused in part by housing scarcity.
- 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. 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 Kellogg Boulevard, John Ireland Boulevard and Jackson Street, as partially addressed in the 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 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 walkability and high-quality public transportation.

### **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 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 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.

### **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 benefitting 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).

January 4, 2019

TO: Planning and Economic Development  
Mike Richardson  
Lucy Thompson

FROM: Sara Chamberlain, Vice Chair  
Saint Paul Parks and Recreation Commission

RE: 2040 Comprehensive Plan

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On December 13, 2018, the Parks and Recreation Commission reviewed the 2040 Comprehensive Plan and would like to submit comments into record as you work to advance the plan. Congratulations on the thoughtful work and planning of the 2040 Comprehensive Plan thus far.

The following concerns and feedback were discussed from Commissioners during December's meeting:

- We must acquire correct general policy in plan that can move more specific ideas forward.
- How do we remain focused on items in Comprehensive plan to ensure equity for all? We must review (types) of sports and hours of operation, etc. in communities we serve.
- What portions of plan can commission push forward?
- How do we uphold the plan and accountability? Is there a recreation and program document at each facility to ensure consistency and accountability?
- Discussions should be included in strategic plan
- Are values reflected in plan?
- Consider equity in programming and children that are not sports focused. What types of programming in addition to sports (related) programs is offered?
- Re: Policy PR-13-to what end? Need for more specific language (example, “..to effectively represent communities..”)
- How does plan engage in climate change?

Finally, community member Tom Dimond provided testimony and the attached document for consideration for the 2040 Comprehensive Plan. Though we remain neutral as to feedback provided, we felt it relevant to add as part of our record.

Staff provided the following comments, which were endorsed and supported by the Parks and Recreation Commission:

**Overall:**

- Specific amenities and features that are still high priority items in the Parks and Recreation system aren't specified or called out in any policy item, including; golf courses, play areas, pools, and the Como Park Zoo & Conservatory.
- References to equitable services such as handicapped accessible facilities and gender-neutral restrooms.
- Specific partnerships, especially long-standing ones that have benefited the department and city over the course of several decades, aren't called out in any policy item, including the long-standing partnership with Como Friends at the Como Park Zoo & Conservatory.
- There are references to modeling best practices and performing routine maintenance on assets, but there isn't specific language about developing dedicated long-term sustainable funding sources to achieve these things.
- The amount of graphics and maps supporting some of the key policy items could be improved and expanded. An example being adding a graphic or mapping the additional green space that has been added over the last decade or since the last Comp Plan as a reference point. Staff would welcome the opportunity to provide options.
- An evaluation of where we are compared to national scale.

**Specific:**

- PR-5: Add – 'play areas, pools and other amenities' after Community Centers.
- PR-6: Change - 'recreation AT neighborhood and community parks' from 'TO neighborhood and community parks'.
- PR-28 or PR-29: To address the lack of acknowledgement for the non-profit supporters of the system, like Como Friends (mentioned above), could add "Como Friends" as an example for collaboration or fostering current relationships.
- On page 95 – In the text under "Perceptions of Park" – refine the whole description and paragraph to reflect the fact that definitions do not always translate to preference. Staff would welcome the opportunity to help refine.

Tom Dimond  
2119 Skyway Drive  
Saint Paul, MN 55119

## 2040 Comprehensive Plan Parks and Open Space Comments

Implement access from our neighborhoods to our riverfront. Pedestrian, bicycle and wildlife connections are essential for residents and visitors to access and enjoy the health and wellness benefits that should be available to all. The Eastside in particular has a severe shortage of safe access. Pigs Eye Parkway and the trails shown in the Great River Passage plan are a priority for implementation.

Include the long standing City Policy and City approved Highwood Plan position if Totem Town is no longer used for corrections it should be retained as public open space.

In Highwood, work to protect natural areas and restore habitat including the numerous parcels of parkland/open space. The City and County should develop a joint management plan, including trail access, public scenic points, signage to identify public open space and designation as part of the Regional Parks and Open Space system.

Develop the bluff trail plan for Highwood that connects Battle Creek, Highwood Park, Totem Town, Taylor Park, Highwood Nature Preserve, Henry Park and Fish Creek. This trail would also connect by trail bridge to Pigs Eye Regional Park, the riverfront, and MN DNR Regional Headquarters/Fish Hatchery.

Reopen the boat launch in Pigs Eye Regional Park off of Red Rock Road and establish a boat launch for kayaks and canoes on the north side of Pigs Eye Lake.

Relocate the wood chipping facility from Pigs Eye Regional parkland to an industrial area. It is located in the north gateway to the park and limits or prevents use of the park.

Adopt a no net loss of wetland policy in Saint Paul. We have lost much of our wetland. Wetland lost in Saint Paul should be mitigated in Saint Paul.

Provide naturalists and programming in nature areas. Work with the DNR, seniors volunteers and others to enhance our natural areas and pass on nature skills and information.

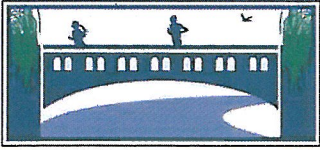
Provide kayak and canoe rental and training at Pigs Eye Lake.

Establish parkland zoning and maintain a public record of all land that is parkland.

Utilize undeveloped right of way for pedestrian/bicycle trails to the greatest extent possible.

Provide separated from road Mississippi River Trail along Point Douglas Road.





# Payne-Phalen

COMMUNITY COUNCIL

567 Payne Avenue, St. Paul MN 55130 [www.paynephalen.org](http://www.paynephalen.org) 651-774-5234 [district5@paynephalen.org](mailto:district5@paynephalen.org)

January 11, 2019

VIA EMAIL

City of Saint Paul City Planning Commission  
25 West 4<sup>th</sup> Street, 1400 CHA  
St. Paul, MN 55102

RE: City of St. Paul 2040 Comprehensive Plan, draft dated November 2, 2018

Dear Commissioners:

On behalf of the Payne-Phalen Community Council (District 5), I am writing to provide our review and comment of the City's draft 2040 Comprehensive Plan, dated November 2, 2018.

From the outset, we offer our sincere praise to our colleagues in the Planning and Economic Development Department for very capably handling the work of this enormous project and for the responsible way in which that work was carried out. As a product of several years, many meetings, and a great deal of research and contemplation, the sheer magnitude of producing such a quality document is important to note. The draft document very clearly shows your strong purpose in sorting through complex issues, the care you took in devising appropriate policy, and it demonstrates a deep level of commitment to the future of St. Paul. We are also grateful to you, Commissioners for your time, energy, thoughtfulness and commitment to the process as well as the product. In all, it's a great document and a great plan and we are very appreciative. With that in mind, we offer these comments and recommendations in the spirit of collaboration as we work together to address the challenges and opportunities of helping our city towards a brighter, more equitable future.

The following comments and recommendations are respectfully submitted for your consideration based on review of the current draft document by PPCC staff and several PPCC Board Members. Our comments are organized sequentially by chapter. At the end of this letter, we offer more general comments about the document as a whole. The overall comments at the end of the letter also offers suggestions for future work related to this project. In preparing this letter, I've tried to be consistent in representing our comments across chapters and reviewers but without erasing the gist and intention of each reviewer. You may notice some variation in different voices and in the fact that we were uneven in the amount of time and attention we were able to give to each chapter. Unfortunately, there are some chapters and topics that deserve much more attention that we were able to give them in the last two months. In any case, we hope that most of our comments might be useful in some measure. Apologies in advance for either being too brief on some or too verbose on others. Please feel free to call or write if further clarification is needed on any point.

Finally, please keep in mind that given the length and timing of the review period relative to other work by PPCC and the cycle of our regular Board meetings, there was not time to conduct the review, assemble comments, and bring them all together for public review and discussion at one of our regularly scheduled Board meetings. That's a function of very practical timing and resource considerations. It is not a reflection of our intention for engaging the community in District 5 on these issues. More to the point, we used the opportunity to use the review period purposefully – not only to provide the City with feedback from the Payne Phalen Community Council – but also as a definitive, preparatory step as PPCC embarks on an extensive process of community engagement on each of these topics as we begin work in 2019 to update our District Plan.

**Section 1: Specific comments about each chapter of the comprehensive plan document:**

***Introduction Chapter:***

1. Overall, the *Introduction Chapter* is very strong, not only as an overview to the intentions of the plan, but also in terms of the context information that it imparts. In particular, the maps are very useful in understanding how various planning consideration play out across the geography of St. Paul. Well done!
  - a. Though two sections, the “Major Trends Informing...” and “preparing the 2040...” are both quite strong in and of themselves, its somewhat confusing that some of them correlate strongly to one or another of the “Core Values” and/or “Focus Area” published on the website, while others don't necessarily correspond. It seems that the “Values” are incorporated into page 10 of the draft, but it's not clear what happened to the “Focus Areas.” Where the “Focus Areas” just intended as part of the public process or were they meant to be foundational to the document too? We recommend the latter. Maybe this section is an update of the Focus Areas? In any case, the words and intentions are all in the right direction, but the organization is confusing. Most importantly, there's no clear, specific thread throughout the rest of the document that amplifies these as organizing themes. They come up here and there is one is deliberately looking for them, but they aren't always so obvious. And that dilutes their overall impact on being the underlying policy rationale.
2. Page 7: The *Major Trends* section contains a lot of useful information and food for thought that will be highly useful for District Councils in updating our District Plans going forward.
3. Page 7: *Equitable geographic allocation of public funding and investment:* One of the most poignant and impactful statements of the entire document is hiding in plain sight at the end of page 7: “The Comprehensive Plan supports the equitable geographic allocation of public funding and investment (especially for land use, housing, transportation, public utilities, and parks) to ensure that the residents in these areas have the resources they need to thrive and prosper.” Unfortunately, this bold and poignant statement is not as prominent as it could or should be given that its hiding at the end of the subsection. We strongly support this position and with that in mind, we recommend three things to amplify its importance:

- a. A stronger line of connection could and should be drawn between the intention of this statement and the 2040 projections for population, households, and employment stated on page 6 in Figure 1-1.
  - b. Because equitable employment for many St. Paul residents is not an automatic byproduct of citywide economic growth, “economic development,” should be included in the parenthetical series of that includes land use, housing, transportation, etc.
  - c. From a graphic, layout point of view, it would be great if this statement and the growth projections could be featured more prominently in the visual organization and format of the document.
4. Page 8: In the “Challenges and Opportunities” section, we believe that in addition to Large Redevelopment Sites, there is a strong opportunity in clusters of geographically proximate infill sites too. For instance, the intersection of Payne Avenue and Phalen Blvd. will be a prominent stop on the Rush Line Bus Rapid Transit (BRT). There are a healthy handful of vacant city-owned sites as well as several underused sites that could be assembled for transit-oriented, mixed-use development. This cluster of properties is within *less than* a 5-minute walking radius of that intended BRT stop and as such, redevelopment of these properties has the strong potential to be catalytic in spurring positive development throughout this part of the city. That being the case, we have three recommendations:
- a. Specially, the Payne/Phalen intersection and the 5-10-minute walk shed around that intersection should be added to the list of “Opportunity Sites” (see page 45, Map LU-3)
  - b. More generally, the concept of clustered infill sites that re-knit and revitalize existing mixed-use districts should be considered at least as important to the City as large redevelopment sites.
  - c. From a readability/clarity perspective, the name of the bullet point on page 8 should be changed to “Opportunity Sites” so that it is consistent with the name of Map LU-3 on page 45.
5. Page 11: The section called *People Infrastructure* is great! Right on! Thank you!
6. Pages 10-12: The content in pages 10-12 that lays out themes, priorities and values is well-considered, and it is a very useful as a part of the introduction to the Com Plan. It will be very useful direction for District 5 as we embark on updating our District Plan. Moreover, we think it will be very useful as a discussion tool for all District Councils across the City, specifically to help ground our Boards, community partners, and the general public in our communities as we update our respective district plans in the coming decade. With that in mind, we recommend that the City’s standard template for preparing District Plans should be updated to so that it calls for inclusion of similar information particularly as it pertains to the demographics, geography, and needs of each district/part of the city.

### ***Land Use***

7. Overall, the *Land Use* chapter is chock-full of useful and critical information. That’s a good thing – especially for the complex topic of land use. But in some cases, it seems this chapter is also

servicing as a proxy or stand-in for a great deal of important policy formation which is related to land use but is not in and of itself land use. And while it's a good thing that the full arc of the chapter is indeed comprehensive, the fact that it's the stand-in on several other topics that might otherwise have their own chapter can be a bit challenging for understanding all of the city's policy intentions. More specifically, there are several considerations:

- a. Unlike other chapters which are organized by goals, the Land Use Chapter has goals, but policies are organized by both geographic parts of the city and specific land use types. This makes it's hard to see how each policy relates to the five high-level goals. This is not a fatal flaw by any means, but it does make it harder to understand how the city's goals will be carried out – particularly in an equitable manner - given that as a product of history and the patterns of historic development, not all land uses are distributed evenly across the city. In addition, the emergence of entrenched areas of economic distress in the Post World War III era (today's so-called Areas of Concentrated Poverty (ACPs) complicate matters further. (For instance, see comment for page 28, Goal 1, below.) So, while we acknowledge that it's not intentional, the reality is that realization of each and every goal may likely be fraught given that any one land use has very different situational circumstances depending on whether or not it is or isn't located within an area of Concentrated Poverty. In short, if equity is indeed the order of the day, much more explicit focus needs to be drawn forth on the nexus between economic growth, population growth, and the intensity of infrastructure and resources that will facilitate that growth in a truly equitable manner.
  - b. Because the Comprehensive Plan document as a whole does not include specific, stand-alone chapters on Economic Development or Environment/Resiliency, otherwise straight forward land use concepts like density, TOD, and the like seem to be “stand-ins” for what the City really needs and wants to say about achieving equitable growth. More in that in the comments related to various pages and in the general comments offered at the end of the letter.
8. Page 28, Goal 1: “Economic and population growth focused around transit.” We are in strong agreement on the broad intentions of this goal. However, in the details through which the city might reach its goal are much less clear.
- a. “Economic Growth” is a good thing for a good many people, but it is very rarely equitable. And the experience of American cities over many decades has demonstrated that not everyone shares in the benefits of economic growth equitably; something more purposeful needs to be in place for that to even be a possibility.
  - b. Economic growth and population growth should most definitely be focused around transit. But the transit lines that currently exists in many parts of St. Paul, parts of District 5 among them, does not in all cases serve the needs of the populations that are most transit-dependent. Ideally transit service would be provided to the places where residents are most in need (dependency) and the places with the most capacity (potential for economic growth) rather than just where service has historically been offered by MetroTransit. In other words, there are large swaths of the population (particularly in ACPs) that are not well-served by existing transit lines. That being the case, these populations are in danger of losing out on economic growth if “transit” is not more precisely spelled out. Calling out the inherent economic need for providing reliable, equitable transit service to such



communities would be hugely beneficial in helping to raise those populations out of poverty.

- c. The potential environmental benefit of the goal itself huge, and yet the language of the goal (and the chapter itself) is vague at best about environmental goals, and the inherent benefits, challenges, opportunities, of addressing them.
9. Page 29, section entitled “Citywide”: Policies LU-1 through LU-4 and LU-6 are all very strong. Excellent! While land use is a critical component of these policies, they are really the kernel of a strong economic development strategy by the City – and they deserve to be thought through, extrapolated, and clarified as such. As noted above, “Economic Growth” is a good thing for a good many people, but it is very rarely equitable. And the experience of American cities over many decades has demonstrated that not everyone shares in the benefits of economic growth equitably. More to the point, many people suffer and bear the unintended consequences of “someone else’s growth.” This set of policies seems to represent a true commitment by the City to change this paradigm. If so, then such intentions are so important and so consequential to our future that that commitment needs to be worked out and thought through so that something more purposeful can be put in place for that eventual reality to even be a considered possibility.
  10. Page 29, Policy LU-1: This policy makes a great deal of sense. It should be clarified though that transit capacity includes true transit dependency. So long as it includes recognition of true transit dependency, transit capacity may be a better measure to go by.
    - a. Here’s why: There may be a may or may not be a misunderstanding in the data between relationship between “cost-burdened” households and “transit-dependent” households? (I’m not certain and I might be wrong but think it’s worth considering.) For instance, if dependency is measured by car ownership alone, it would include those households with one or zero cars by choice as opposed to those where that is a function of the household income. Likewise, some cost-burdened households may own a car *by necessity* due to the relative lack of access to reliable transit to low-density (land use) and low concentration (jobs) areas of employment. In such a case – and I suspect there are many such cases in impacted neighborhoods – the relative lack of transit access to such areas *may contribute to* a household’s financial burden. You may have this worked out in terms of the actual data benchmarks and definitions, but I suggest that it would be useful to sort that out with more clarity for the general readership.
    - b. Along the same lines, it might be useful to recommend that going forward, transit investments should be based on potential capacity for additional or improved transit service (*vis-à-vis* new, intensified development) as well as existing levels of transit dependency. Again, because some households that would fare better with transit (economically) might actually have a car today due to the present lack of potential transit options currently available.
  11. Page 29, Policy LU-6: This policy is (mostly) fantastic. But it’s not land use policy.; its economic development policy – and its needs and deserves to be thought out and articulated in a much

more detailed and comprehensive manner than is otherwise possible when it is standing-in as a land use policy alone.

12. Page 29, “Benefits of Transit-Oriented Development” and page 30: “Applying ACPs to St. Paul:” These sidebars are very useful in many ways. That said, we think that both of these need to be more emphatic on the importance of meaningful, reliable access to *educational opportunities* and *employment opportunities* from the perspective of the working public, especially the working poor. For instance, Payne-Phalen has one of the highest unemployment rates in the city, one of the lowest levels of education attainment, and one of the lowest levels of household income. This means that from an *economic* perspective, many households could benefit from reliable transit service – but only if it reliably connects them to clusters of employment and educational opportunity across St. Paul and throughout the Metropolitan Area. The 1990s definition of TOD is often shorthanded as “condos and coffeeshops.” Thus, TOD is often dismissed as irrelevant to many low-income communities (with notable exceptions along the Green Line). It really needs to be updated and expanded to be much more inclusive. In particular, the city is full of business parks and industrial parks that have good paying jobs (jobs that don’t always require a high level of education), but too often such places don’t have very good transit service – if they have it at all. That lack of service might come from the relative low-level of *employment intensity* as a function of low-level commercial/industrial density, i.e. the vast amounts of space given over to huge swaths of surface parking. So, because of the land use/intensity model that’s been in place for many decades in developing in St. Paul’s industrial and business parks, people from high unemployment, low-education households sometime need to spend proportionately too much of their precious income on owning and maintaining a car *precisely because* over the years, land use policy (including TOD) has not emphasized the critical importance of *employment density* in such places. As a consequence, those who can least afford to eke out a car payment are compelled to do so so that they can get to relatively good paying jobs in such places. And that’s a Catch-22 for many working families. Others who can’t afford to have a car so that they can get to business and industrial parks are left with few choices beyond such as low-wage jobs cleaning offices or working in restaurants downtown because that’s the only place where the current transit lines go on a reliable basis. For example, there’s no good way to use transit to connect from Payne-Phalen to the job clusters in Energy Park or the West Side Flats without a trip that is well over an hour and requires one or more transfers. MetroTransit will not even considering offering service if there isn’t a certain level of residential density correlated with employment density. The point is that citywide land use, including TOD as originally conceived in the 1990s and presented here, does not necessarily *benefit* everyone in the city – especially the most needy. Our transit system does not always do a good job of connecting the working poor to good paying jobs. That being the case, the definition and intensity of land uses and land use typologies (like TOD) need to be more specific and more emphatic so that they expand and amplify how improving such land use and development typologies could actually help to alleviate the economic stress of working families needing to own and maintain a car because it’s the only viable way to get to a decent job with a decent income.

13. Page 33: Neighborhood Nodes and Page 43, Map LU-2: Land Use 2040: We are very appreciative of the addition of Neighborhood Nodes to the future Land Use map. We believe this is very useful construct for understanding the relationship between where people live, work, shop, get services, and the importance of transit centrality in that spatial relationship. Moreover, we strongly agree that this land use feature correctly represents the fabric of our existing cityscape and how St. Paul's neighborhoods function on an everyday basis. With that in mind, we have several practical recommendations:
- a. First, we believe that the City should develop a strong and durable economic development and investment strategy to help neighborhood nodes survive and thrive. Many nodes are healthy but could use a boost to strengthen them. Too many other neighborhoods have been ravaged by the vagaries of Post-World War II suburbanization and the associated disinvestment. Those nodes still have high-levels of transit service and strong residential populations. But they need infill development or redevelopment of parcels that were given over to suburban-style design strategies in the 1960s-2000. Given the population growth expected in St. Paul in the coming decade, these next ten years are an optimal time for the City to make strategic, catalytic investments to consolidate the strength of neighborhood nodes across the city, most especially in Areas of Concentrated Poverty.
  - b. We believe that the City's reinvestment dollars for neighborhood Nodes should be expanded and that nodes within Areas of Concentrated Poverty should be the higher priority for public investment (over those outside the ACP where the private market is more likely to make investments first).
  - c. Second, we agree with the proposed nodes at Payne and Tedesco, Payne and Phalen, Payne and Case, and Payne and Maryland. Likewise, we agree with the proposed nodes at Phalen and Olive and Phalen and Cayuga. We also agree with the nodes at Arcade and Phalen and Arcade and Wheelock Parkway.
  - d. Third, we strongly recommend inclusion of two locations that we believe already are important nodes in District 5 but are not called out on the map in this draft: Arcade and Case and Arcade and Maryland both have strong commercial land uses, regular bus service and both are proximate to residential population. It's kind of mind boggling that neither of these was called out - considering that there are two buses on Arcade. We assume that was an unintentional oversight.
  - e. In addition, a node should be added at East 7<sup>th</sup> and Payne Avenue. The importance of this intersection in the city's street grid, the level and future capacity at this intersection and the strong potential for redevelopment in this location would support a mix of residential, commercial-office, commercial-retail, and education/institutional uses. This intersection has transit connectivity and the high potential for intensive redevelopment and additional transit capacity that comes with that. Such redevelopment potential in this location would have many benefits such (a) as adding employment opportunities along existing transit spines (as opposed to within business parks that have extensive surface parking), (b) providing greater opportunities to connect new and existing populations to Swede Hollow, a daylighted Phalen Creek, and (c) re-urbanizing the expanse of knicky-knacky, suburban style development patterns that stretch along East Seventh Street between Downtown and Metropolitan State University.

- f. Fourth, and not insignificantly, the legend of the map should indicate that the extent of the black line that denotes each node is a measure of comfortable walking distance to that intersection and that such proximity is a foundational to higher transit usage/service which means the possibility that fewer households need to own cars (by choice of by necessity). The addition to the legend is a readability measure. The possibilities that may come from the public understanding that measurement could or should be drawn out more clearly in a later amendment of an environmental “chapter”/strategy to the comprehensive plan.
14. Page 36, Transportation: Not all of the city’s current transit lines are well-placed to serve transit-dependent communities. An increased investment in service to transit-dependent communities so that transit investments are more likely to service the populations who actually need it. See comments above.
  15. Page 43, Map LU-2: Land Use 2040: See comments for page 33, above.
  16. Page 45, Map LU-3: Opportunity Sites: We are also very appreciative of the intentions of this map as a way to indicate locations around the city that holds a lot of possibilities for future redevelopment. Good idea! With that in mind, we have several recommendations:
    - a. First, we believe strongly that the intersection of Payne and Phalen should be added to this map and the associated list. This intersection has very high redevelopment potential because it is a station stop on the planned Rush Line Bus Rapid Transit Line (BRT) and because there is a healthy handful of publicly-owned parcels that together add up to an opportunity of similar characteristics to the other sites currently listed in the draft document. It’s not clear what might delineate a red star/mixed use site from a yellow-star/urban neighborhood site, but we think that this location has a very strong potential to be a much improved mixed-use, transit-oriented urban neighborhood (in real life terms if not only in professional planning lingo/categories alone). In any case, we request that you please add this site to the map and the list.
    - b. In addition, the stretch along East Seventh Street between Downtown and Metropolitan State University should be added to the list of “Opportunity Sites.” This stretch currently feels like a void in the urban fabric – and redeveloping that void in a more dense, urban way would connect up various places (Lower Phalen business Park, Payne and West 7<sup>th</sup> in Railroad Island, and Dayton’s Bluff. This stretch has a great deal of future capacity as well as the strong potential for redevelopment that would support a mix of residential, commercial-office, commercial-retail, and education/institutional uses. The area has transit connectivity and the high potential for intensive redevelopment and additional transit capacity that comes with that. Such redevelopment potential in this area would have many benefits such (a) as adding employment opportunities along existing transit spines (as opposed to within business parks that have extensive surface parking), (b) providing greater opportunities to connect new and existing populations to Swede Hollow, a daylighted Phalen Creek, and (c) re-urbanizing the expanse of knicky-knacky, suburban style development patterns that stretch along East Seventh Street between Downtown and Metropolitan State University.



- c. Second, as with Neighborhood Nodes, we believe that the City's reinvestment dollars for Opportunity Sites should be prioritized so that sites within Areas of Concentrated Poverty should be the higher priority for public investment that leverages private investment (as opposed to those sites outside the ACP where the private market is more likely to initiate projects).

17. Page 46, Map LU-4: Significant Public Views: As a huge fan of Kevin Lynch, I'm really glad that there's an actual requirement to include a list of significant views. I understand this is a work in progress, so with that in mind, we recommend the following additions (as relates specifically to the Payne Phalen Community):

- a. From nearby the intersection of Payne and Maryland Avenue facing south, there is a broad, sweeping view of the Mississippi River Valley and the bluffs of the West Side. This view is very dramatic, particularly at certain times of the day and year. This change in topography and the view that comes with it really enhances the very special sense of place along a several-block stretch of Payne Avenue. This is a really dramatic view for a city where so many places are characterized by their flatness in topography. The view should be noted, preserved, and enhanced.
- b. Likewise, from nearby the intersection of Payne and Maryland Avenue facing west on Maryland, there is a wonderful view of the Minneapolis skyline rising up over the neighborhoods in St. Paul - especially those of the North End! Given the city's street grid, it's unlikely that this view corridor would ever be blocked, but future streetscaping and change along Maryland Avenue should take this view into account so that it can be protected and enhanced.
- c. On Johnson Parkway, facing north between Phalen Boulevard and Wheelock Parkway East/East Lakeshore Drive there is a very wide and wonderful view of Lake Phalen. This view along this stretch of parkway and park land feels like a gateway to an enchanted land. This view corridor should be identified, preserved and enhanced.
- d. One of the absolute best, picture postcard views of the St. Paul skyline is from the vantage point at the south end of Rivoli Street (a block south of Mt. Ida Street). It's also one of the least known, which is kind of nice too. Recent redevelopment on the west side of this block of Rivoli has capitalized on that view (no pun intended) so that it is available to new residents - which is great. But that calls for some sort of more defined overlook and green space at the far south end of Rivoli to ensure that this remarkably breathtaking view is preserved and available to the general public for generations into the future.

18. Page 48, Map LU-6: Gross Solar Potential: Thanks for adding this map! It's important to be thinking about energy as a topic going forward. Two comments:

- a. In the interest of expanding public education and conversancy on this topic, it might be good to notate the map to indicate this is about the potential for solar energy collection, not use. It's fairly obvious, but in a time when community solar energy is available in many locations, it would be good to ensure that no one in the public is dissuaded because they might have been confused by this otherwise very useful graphic.

## ***Transportation***

19. Overall, much like the *Land Use* chapter, the Transportation chapter has a lot of useful and critical information. The organization of the chapter by goals and policies makes it easier to read and absorb than the Land use Chapter; it's not as far flung. That's all good.
20. Page 54: Goal 3: Great! This is absolutely critical; see comments above in Land Use. Ideally this goal would be amplified in a chapter that focuses on the cross-policy goals and intentions of employment and economic development (given the importance of the land use-transportation-employment nexus).
21. Page 54: There are policies related to freight later on in the chapter. There should be a more explicit goal related to freight. Having such a goal is important from the perspective of intra-regional freight moving through the city's port and rail facilities, but also in relation to "last mile" freight traffic on city the city's street and roadway network. Case in point: The dramatic increase in small delivery vans traversing city streets to deliver online purchases to businesses and residents citywide.
22. Page 55: Goal 1: Investment reflects City priorities. This is fantastic and right on! Exactly as it should be. The only glitch is that either this title doesn't specify whether the "priorities" are the city's transportation priorities, (i.e. the other 7 goals) or that they are a set of human development and physical development priorities. If it's the former, that's easily fixed. If it's the latter, then it documents really doesn't explicitly state or rank what the City's priorities are and whether they will ever be decided upon and stick. And that's an unfortunate flaw that goes beyond matters related to transportation alone.
23. Page 55: List of policies under Goal 1: In the list of goals, it makes sense to include a specific policy related to enhancing *employment density* in key areas across the city as a means to ensure that transportation investments (transit as well as road and bridge investments) are maximized as part of the health and good function of our overall economic system.
24. Page 55: Policy T-1: Industrial Parks and Business Parks (i.e. Phalen Corridor, West Side Flats, and Energy Park) should be included as a group or a type because these are key job centers too – especially for residents that are not necessarily working in the professional sector of the economy. (see related comments in the Land Use section above).
25. Page 55: Policy T-7: We recommend two other items that should be added here:
  - a. Snow removal and storage methods that ensure sidewalks on busy corridors are kept clear in the winter especially in places where there are very narrow boulevards and snow storage ends up equating to blocked sidewalks and no pedestrian access through the winter months.
  - b. Driver awareness of pedestrians vastly improves in places where zebra-stripe crosswalks have been added to intersections along high-volume roadways. Snelling Avenue along the A-Line corridor comes to mind.

26. Page 57: Policy T-27: re: “in all parts of the city...” See comments above related to Page 29-30: “Benefits of Transit-Oriented Development” and page 30: “Applying ACPs to St. Paul.”
27. Page 66: Map T-5: Job Concentrations and Transit: Hands down this is the most fascinating map in the document and the one most relevant to the extremely important statement on Page 7: “The equitable geographic allocation of public funding and investment (especially for land use, housing, transportation, public utilities, and parks) to ensure that the residents in these areas have the resources they need to thrive and prosper.” Education and employment opportunity should be added into the sequence of that statement on page 7, but the map makes the case much more clearly. Thank you for taking the time and effort to make this map; the value of the information it conveys about the geographic distribution of opportunity across the city cannot be overstated. With that in mind, we have several suggestions for enhancing the use of this map:
- Analytical: The information from this map should be overlaid with information from three other maps: Percent of households without cars, Income and poverty by household, and Educational attainment. There may be other data points/maps too. In any case, the cross analysis of a combination of indicator maps would lead right to a much clearer identification and picture of what investments need to be made so that in the year 2040, the area of concentrated poverty might actually be erased or at least considerably shrunk! Such a map would provide the foundation for establishing the city’s investment priorities!
  - On a smaller note, the legibility of the map might be improved by making the highest concentrations red (a hot color that pops out) and the lowest level a cool color (like blue or green) that recedes. Either way, the heat map concept is the way to go. Well done!
28. Page 80: Appendix B: List of Potential Projects: Row 1: Conversions of four-lanes to three lanes: Great! Please call out the opportunity to add green medians as a way to (a) reduce the crosswalk distance and add a refuge and (2) beautify the neighborhood. This was done to great effect on Snelling Avenue South and to decent effect on parts of Marshall Avenue and the lower stretches of Payne Avenue. Overall there seems to be a good distribution of park spaces across the city – a variety of sizes, some with amenities and some just open spaces for games or picnics. There are both City and Regional parks.

### ***Parks, Recreation and Open Space***

29. Overall there seems to be a good distribution of park spaces across the city – a variety of sizes, some with amenities and some just open spaces for games or picnics. There are both City and Regional parks.
30. There are several maps dealing with parks and trails, but no maps showing locations of the recreation centers and community centers. While some recreation centers are in parks, it would be helpful to see their locations in relation to each other within the city. The centers are referenced in some of the policy goals, either as rec centers or as facilities. Considering the use of various terminology would help for readership in the general public.

31. Page 10-: Appendix A, Map P-3: Regional Trail Search Corridor:  
We could find no explanation of what this name/topic meant. Is it a general corridor where the precise location of a trail hasn't been determined yet?
32. Page 107: Appendix B, Non-Regional Park and Trail Inventory: This list includes parks, recreation centers and community centers, but there is no listing for Hancock Rec. Center (listed on the City website). An oversight? Two other rec centers, South St. Anthony Rec Center and the St. Clair Rec Center, are now "re-partnered" with other groups or agencies (according the city parks list), so are they going by a different name?
33. Policies on partnerships and shared-use facilities (PR-24, PR-29, PR-32) are excellent and should be promoted/continued.
34. PR-33 - Coordination with SP Public Schools to reduce redundancies is important. Both lead to cost-savings for residents.

### ***Housing***

35. Appendix A, p. 138 Chart 9 seems confusing. There is no label on column. Is the row the tenant income % AMI? Is the column how many people within that % AMI can afford their unit? (example: 75% of tenants with <30% AMI could afford their unit) Or is there a reference to the total rental units?
36. Appendix A, p.144 Naturally-Occurring Affordable Housing. *Error* on map number referenced. The last sentence on the page refers to Map 7 for rental units coded by age, but it should be Map 8.
37. Appendix A, p. 152 Charts 23 & 24: Both say Cost Burden by Race, but chart 24 says (Owner). Is chart 23 supposed to be (Renter) or total? The chart legend shows both the blue and gold colors are for 2010-2014. Is one of these colors supposed to be years 2005-2009 (one of the sources noted)?
38. Appendix A, charts on pages 157-159 Cost Burden by Household Type: The chart legend (p. 159) shows both the blue and gold colors are for 2010-2014. Is one of these colors supposed to be years 2005-2009 (one of the sources noted)?
39. Appendix B, p. 168 Home Ownership: Education and Materials sections that mention materials for non-English speakers and/or links to translations remains important and definitely should continue where it exists and increase where lacking. Also, the awareness of existing small lots that are buildable and the development of a small lot information sheet would both be beneficial as more people choose to downsize or 'live tiny'.
40. Appendix B, p. 171 Decrease Homelessness: An Emergency Housing Plan to support tenants displaced by non-compliance is important. Tenants should be provided information on

resources available, including emergency housing and legal information or contacts, so they can find out what their options are if they are out short-term or permanently from their residence. If an eviction notice is due to the landlord's inaction it helps to have someone to talk to that explains your options, rights and responsibilities.

### ***Water Resources Management***

41. *Overall comments:* Because the inclusion of this chapter is a requirement of the Metropolitan Council, it is understandable that it is heavy on technical information. We recognize that much of the substance of that technical information is included in other documents that are intended to be amended into St. Paul's Comprehensive Plan when it is adopted. That said, there is an opportunity missed in the current version of this this chapter in that it speaks mostly too an expert readership. A few efforts have been made with the sidebars to explain things a bit more clearly in lay terms – and that is certainly laudable. A final draft of this chapter might go a little further in providing a bit more language, graphics, and organization of information so that it speaks more directly to the general public as a way to engage the public in the broader environmental/resiliency intentions of this suite of inter-related water issues. This is particularly important because St. Paul's Comprehensive Plan does not otherwise have a chapter or chapters on Environment and/or Resilience. The following possibilities are offered as suggestions to help make this critical information more identifiable to how residents and businesses in St. Paul conduct their daily lives. Specific suggestions for improving the public's engagement with the substantive content of this chapter is detailed in some of the comments below – particularly those about the chapter's sidebars and maps.
- a. Overall, the Water Resources Management chapter seems to be missing an emphasis or discussion on how these goals will be prioritized amongst themselves, and also amongst the needs of various communities and initiatives within St. Paul. We think it may also be important to mention equity specifically as it relates to various aspects of water resources management (resiliency/flood management, green infrastructure, surface water quality).
  - b. In addition, we also support looking at equity within the public drinking water system, as you have mentioned.
42. Page 180: Spelling out the goal of *integration* in Goal 1: Integrated Water management is a great idea! Thank you!
43. Page 181: The sidebar and graphics on "Shared, Stacked Green Infrastructure" is great. Nice touch. What's not so clear is how this goal interfaces with the goal of using land more efficiently and increasing density to accommodate growth? For instance, what will the relative priorities be when contemplating new, medium- or high-density transit-oriented development? Perhaps this potential conflict could or should be mapped out in relation to areas of intended growth and areas where there is sufficient land to provide so-called passive green space. Clearly stacked green space has an active purpose, and that's all well and good, but how does that compare to the need for intensification of development at key locations around the city? Developing some sort of threshold or tool to navigate such policy conflicts when they arise seems to be in order.



- a. For instance, Kendall Hardware on the corner of Payne Avenue and Phalen Blvd. has a rain garden next to it, but the location of that rain garden takes up space along the street frontage; space that would be valuable for infill development, generating tax base, and enhancing urban design along a corridor that needs more cohesion. So, while this rain garden makes sense from an ecological perspective, its location on that particular site undermines the intentions of filling in gaps along a commercial corridor.
44. Page 182: *Minimal Impact Design Standards*: As with the comment on “SSGI” (see above), it seems that *Minimal Impact Design Standards* (MIDS) are both a good idea as well as something that could - at least in some cases - be in direct conflict with the plan’s higher-level goal related to improving greater density across the city (see page 8). Again, this potential conflict could or should be mapped out in relation to areas of intended growth and areas where there is sufficient land to provide so-called passive green space. And developing some sort of threshold or tool to navigate such policy conflicts when they arise also seems to be in order.
45. Page 182: Policies WR-12 and WR-16 seem closely related from a both practical sense as well as a fiscal prioritization. Additional details and information (from allied documents) would be helpful to include herein. We recommend that map would be created that lays out the “opportunity” sites and projects across the city; something akin to Map LU-3 in the Land Use Chapter that defines “Opportunity Sites.” When it comes to the very practical business of funding actual improvement projects it will be critical to be able to assess the entire constellation needs citywide against the merits and costs of particular projects as they are programmed.
- a. For instance, restoration and/or daylighting of some or all portion of Phalen Creek are important from a technical and quality of life perspective on the East Side. Ensuring that these projects remain a priority for the City and our partners at the watersheds is critical to seeing them through by 2040 - if not sooner. In other words, undertaking a major impairment or restoration project takes a well-defined set of strategic capital priorities. While large projects might need to be undertaken incrementally, they can’t be done nearly as effectively or efficiently through a piecemeal capital funding approach.
46. Page 183: The sidebar entitled “Water is All Around Us” is great! From a format/legibility perspective, it should be located at the beginning of the chapter since it is a better overview that will help the public understand the need for and purpose of having a comprehensive water management strategy. The relevance and understanding of the two sidebars and three principals that precede this (SSGI, BMP, and MIDS) will be better understood if the context information offered in “Water is All Around Us” comes first in the sequence.
47. Page 184: Goal 4 indicates maintenance and rehabilitation of gray stormwater infrastructure? In light of the environmental/resiliency challenges we face as a city (and as a planet) is it not a good idea to also create policy that calls for *expanding and developing additional gray stormwater infrastructure* and capacity in the coming twenty years?

48. Page 185: Goal 5: Policy WR-24: This makes a lot of sense, however a word stronger than “encourage” should be used. Along these lines, it is important from a public policy perspective to understand how much of the cost burden of that identification and correction of Inflow and Infiltration (I&I) flowing into and through St. Paul from other cities and municipalities in the Metropolitan Area falls on the shoulders of our taxpayers since all wastewater in the region travels through our city on its way to Pig’s Eye? In other words, are St. Paul taxpayers disproportionately burdened by the costs of regional I&I overall?
49. Page 185: Given that “equity” is a major consideration on this plan as well as Thrive 2040, it seems unusual that in St. Paul’s Comprehensive Plan there is no goal, policy, or text that addresses the issue of the relatively high cost of sewer access charges (SAC) for central cities relative to outer ring cities in the Metropolitan Area. In particular, the financial burden of this cost can be significant to small entrepreneurs who seek to open small businesses – businesses that help achieve our commercial and retail aspirations along commercial corridors and within neighborhood nodes. Please consider conducting some analysis or crafting some policy that would get at the potential barriers at the intersection of creating small business opportunities while carrying the burden of sewer access charges in *the* city that requires the most intensive sewer infrastructure in the region due to the fact that the regional waste water facility is located in St. Paul. (In the unlikely circumstance that there is actually a financial benefit to St. Paul in this respect, that should be included too – if only as a mean to nullify such concern).
50. Page 187, map WR-1: This is very useful. It would also be useful as the base layer of an additional map that locates “opportunity” projects such as the work anticipated for Lower Phalen Creek/Swede Hollow Park.
51. Page 188, Map WR-2: This map is not very useful in helping the general public/non-expert audience understand the relevance of these facilities to the city’s system of (aging) infrastructure needs, resiliency considerations, or tax burden. It would also be useful as the base layer of an additional map that locates “opportunity” projects such as the work anticipated for Lower Phalen Creek/Swede Hollow Park. Delineating the following might help:
- a. The map should have a legend that explains why some areas are one color and others are another color. Also, why are some areas so large and others are relatively small? is the size and shape of each area based on topography, development intensity, time period of infrastructure construction, or something else entirely?
  - b. Also, what is it that the residents and businesses of area #8566-370 should really know about or care about? How can this be strengthened so that all of us find this map/information useful – especially District Councils that need to update our district plans?
- Clearly a lot of the specificity in this map may not be that interesting to the general public. But if the goal of this document is to engage the public in understanding and being part of a *comprehensive* approach toward our city’s shared challenges and opportunities over the next twenty years, it seems important to raise the level of understanding about *all* of the pieces at play in this complex puzzle – regardless of how exciting they may or may not be to any one individual. To be more concise, it might be useful for the public to have a greater appreciation

of the fact that (for instance) sprucing up a playground or filling potholes competes for resources with things like maintaining citywide/regional sewer facilities and infrastructure. Boring for some but impactful to all.

52. Page 189, map WR-3: Ditto the general public education/engagement comments above for MapWR-3. In addition: On the legend:
- a. BMPS should be spelled out.
  - b. Outfalls need to be explained. What are they?
  - c. Watershed boundaries are too light to be readable.
  - d. The color for Green Infrastructure BMPs is too close to the color of storm sewer pipes for their location to be read optimally (i.e. Is that a GI-BMP at Payne and Minnehaha?)
  - e. A few additional indications of main streets would be helpful too. Wouldn't it be great if SPPS teachers, parents or community ed leaders could educate children about stormwater run-off by asking them to locate their house, the closest storm drain and chart the path out to the nearest surface water?
53. Page 190, Local Surface Water Management Plan: Two thirds of the page is empty and calling out for a little more information for those who may never go to the trouble of looking up the actual appendix document.
54. Page 195 and 196, especially "Financial Mechanisms" - It may be important from a public policy perspective to understand how much of the cost burden of that identification and correction of Inflow and infiltration (I&I) from other cities and municipalities in the Metropolitan Area falls on the shoulders of City of St. Paul taxpayers especially since all wastewater in the region travels through our city on its way to Pig's Eye? See comments above for page 185.
55. Page 198, Private Sewer Assessment Program: There is an excellent public education opportunity here that is very specific to property owners, especially homeowners. In a culture where we are all encouraged to have a colonoscopy at age 50, it is curious that in a city where most residential structures are well over 50 or 100 years old, most homeowners are completely unaware of the virtues of maintaining the sewer line from their basement to the street, much less having it cleaned out once in a while. I would venture to say that most homeowners aren't even aware the sewer line is their own responsibility. And a little bit of ignorance can lead to some very messy circumstances and a huge financial problem for individual homeowners. So, while it's great that this information is included, I recommend incorporating in some of the very useful graphics that the Public Works Department has on their webpage. See the section "Ownership and Location of Your Private Sewer Line" at <https://www.stpaul.gov/departments/public-works/sewer-utility-divison/property-owner-information>



### ***Heritage and Cultural Preservation***

56. We reviewed the draft of the Heritage Preservation Chapter that was posted before the November 2<sup>nd</sup> draft. That version was very strong in the overall intent for integrating preservation consciousness and practice into the city's development framework. Big kudos! We have two recommendations for implementations steps
- a. Make sure that updating or embarking on a citywide reconnaissance survey is included in the workplan. This will be as important as context studies and designations studies.
  - b. As a city of St. Paul's age, with multiple layers of development over the course of its history, and with so many critical historic resources, the city really ought to have administrative demolition review for each and every demolition permit granted. The positive and lasting benefits far outweigh whatever concerns might linger.

### ***Implementation***

57. See comments below in the section entitled, "Notes on the *substantive content...*"

### **Section 2: Overall comments about the totality of the comprehensive plan document:**

#### **Notes on the *organization, readability, and understandability* of the document and its contents:**

For the most part, each chapter would seem to be organized in the same way. But there are subtle differences between how each chapter organizes and conveys information. That's to be expected in preparing a draft of something so large and so complex. For the next and presumably final iteration, we recommend that the following be taken into consideration:

58. Those chapters where the sequence of policies is closely tied to the numbering and sequence of goal statements are the easiest to read, understand, and absorb. In cases such as the land use chapter, the organization is by a professional typology – not policy goals. So, while that makes sense in relating policy to specific types, this choice makes it tough to trace whether such policies might actually be effective in helping to realize the goals of the chapter.
59. The inclusion of Core Values and Focus Areas is great. That said, it's not immediately apparent why some of these fall into one category and not the other. For instance, "health" is a value (and "community/public health" is a Focus Area) while "resiliency" is a Focus Area but not a value. It's not to say that the neither if these should be in the category they are in – presumably a good case could or has been made for why each is in the category it's in. It's just not obvious to the reader.
60. In looking at the 2040 plan website, the icon/box for Core Values and Focus Areas are still there (as they have been for many months), but the November 2<sup>nd</sup> draft document published specifically for public review and comment seems to *includes* only the Focus Areas in the

online .pdf document; some of the “Core Values” seems to make it into the .pdf while others do not. In addition, each of the Core Values and Focus Areas have something labeled a “fact sheet” which it turns out to be the sort of organizing crosswalk information one would want and need to navigate across and between the topical content of each chapter/topic area in the plan document.

61. Most importantly, the current organizational choices of the document sometimes make it hard to recognize and see these components in relation to the substantive mete of the goals and policy intentions. While the intention is that these aspirations (?) are carried throughout the entire document, it seems uneven in where they do and where they don't apply. And that makes it hard to know whether that inclusion or exclusion was (a) purposeful and intentional, (b) unintended and unexamined due to time considerations, or (c) just never thought of, analyzed, and worked out in the first place.
62. Perhaps the most practical way to address this is to simply (1) include the fact sheets/crosswalk matrices in the beginning of each chapter (right up there with the introduction and goals for the chapter) and then (2) as the reader cruises through each chapter, there could be *much more explicit* notes, symbols, icons, etc. throughout the text to say which polices are considered part of the family of each core value and/or focus area. Please, show me! Hit me over the head with it! As a reader, it's what I need so that I can really comprehend the city's intentions as clearly as possible.
63. This next comment is offered from the perspective of a professional who is constantly seeking ways to make complex ideas relatable and understandable to a lay audience. It is offered with absolute respect and admiration for my planning colleagues along with deep humility gleaned from personal experience and very positive results on a recent effort of this magnitude: *Hire a professional copy editor*. They are not expensive, and the cost is outweighed a thousand-fold in how they can bring their own specialized experience to the complex work of such an endeavor. It will help a lot in bringing overall unity and consistency to a document compiled by many authors. Let me know if you need or would like a recommendation.
64. On the matter of organization, one more! The work in that came of this project is excellent. It can be completely exhilarating, but let's face it, it can be truly exhausting. PED staff and a group of commissioners has been hard at it for at least four years now. Four years! It's a team effort, but members of the team, key authors, analysts, and internal reviewers and all of the internal allies who provided substantive guidance and help along the way deserve some very well-earned credit! You deserve to take a bow. You deserve a curtain call. And you know that there is a particularly low-key way that that is done in the public sector. In other words: *Include an acknowledgements page!*

Notes on the **substantive content** of the goals, policies, and proposals within the document  
(at least as far as it reads so far):

Huge applause for calling out ACPs in each and every map all across the document. It's not one map in one chapter. It's plain to see on each and every map. That's huge! It's highly commendable and really changes the manner through which a whole generation of staff, elected officials, community partners, and civic leaders see and think about our city. The MetCouncil's definition and boundary may not be 100% relevant to each and every person across the city. But it's a really significant foot forward in terms of tacking inequity through the intentional practice of planning! Bravo!

Throughout the entirety of the document, the matter of equity and concentrated poverty is noted and embraced. Even the casual reader can see that the authors of the document are grappling with the complexities of how this plays out in all facets of local government and the way government serves the people of this city. And that's a huge undertaking – not one that just happened on its own. So, hats off to our colleagues in PED! So proud that that's happening.

All that said, there is a bit more that could be done to address how the city approaches Areas of Concentrated Poverty over the coming two decades. Most of it is already there; the document has all of the right ingredients and all of the right intentions. We're hard put to find a concept or ideal that's not included in the document. The concern is that the document needs a little more "working out" or "smoothing out" in terms of its organization and in terms of how the thrust of *how various policies intersect with one another* – or more to the point, don't yet intersect with one another closely enough to be understood as a long-term local government strategy for accomplishing the plan's goals. More importantly, those intersections are not yet clear enough to point out the combination of policies in such a way so that success is ensured, not just aspired to.

*For example:* The nexus between land use, employment, commerce, housing and transportation is in some manner the tutti-frutti of comprehensive plan topics. But it is the most important and critical set of policy relationships to get right if there is to be any positive momentum toward a more equitable and just future. Topics like water, parks, and preservation are all very important in their own right and each one has critical touch points with each of these other topics. The core building block of our lives and relative prosperity as city dwellers lies in the intricate relationship between five things:

- (i) Where and how we live
- (ii) Where and how we earn a living
- (iii) Where and how we get our daily bread, and
- (iv) Where and how get all of our other basic services and needs met (education, health care, medical care, religious and cultural well-being).
- (v) And how we navigate and connect through time, space among and between each of those four things.

Importantly, that core building block of city life has characteristics that we all share in common. But the essential characteristics of that building block are also highly varied amongst and between us. For many, the characteristics of that building block are solid and in great shape – and things

work well most days of the week and most months of the year. For many others, the very cohesion of that building block is under near constant stress – too often on a daily basis. In other words, this is where everyday inequity can be successfully addressed by the policies of local government. And as noted above in our comments, addressing that inequity is critical and overdue in Payne-Phalen as well as other parts of the city that are concentrated areas of poverty.

*Here's the nut of it:* First, the draft document includes very strong and very purposeful intention about equitable economic development going forward – but much of it is masquerading as land use or one of the other policy topics. Land use is an essential component to successful and equitable economic development, but they aren't the same thing. And in my estimation – as a planning professional, as a resident, and as a citizen of this metropolitan area – St. Paul could really, really benefit from a strong, articulate, and concerted economic development strategy – one that is fully explored, fully fleshed out, fully resourced and fully aligned with the city's land use, housing, and transportation policies. All of the components of economic development - Education, employment, commerce, industry, property development and revitalization – matter to our lives for each and every one of us. Its where opportunity lives and grows. Unfortunately, it's also where too many currently living in St. Paul just can't reach that opportunity.

Second, the regional and global circumstances we find ourselves in in the twenty-first century compel us to think candidly and cogently about climate, environment, and resilience as something more than seasoning sprinkled throughout; these matters need to be woven into the very fabric of the core building block of urban life – where and how we live, where and how we work, how we get our all of our daily needs and services met, and how we get between all of those things in both space and time.

***Respectfully recommended to elected officials and department heads:***

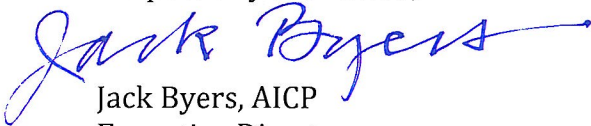
Reflecting back to earlier comments, here's a great example of why all of this matters: On page 7 there is a subsection called "*Equitable geographic allocation of public funding and investment.*" The statements in this subsection are likely the most meaningful, poignant, and potentially impactful statements in the entire document. The concept of sorting out equitable geographic allocation of limited public funding and investment is spot on! Precisely because public resources are limited, the statements and the strong intentions of this subsection really need and deserve further explanation, clarification, and more precise integration throughout the document so that our current and future elected officials understand it, embrace it, and carry it out within and across different administrations and cohorts of elected and appointed officials.

The need for a strong, unified, prioritized economic development chapter, plan, or strategy (noted above) is recommended for eventual incorporation into the comprehensive plan is paramount to the work of this comprehensive plan being carried out effectively across the next generation. Your leadership is needed to recognize the excellent staff work that already exists in this document and to call for and substantively support the additional staff work needed for such an effort on behalf of the citizens of St. Paul, particularly those in Areas of Concentrated Poverty that have not in all cases shared in the prosperity of the rest of the city.

65. We suggest that the work of preparing a defined economic development chapter, plan, and strategy could or should be carried out in one of at least three possible ways:
- a. As an expansion and elaboration of the existing Implementation Chapter that unifies and cross references all relevant policies so that they add up to a deliberate, prioritized, and impactful whole.
  - b. As a new, additional stand-alone chapter of the comprehensive plan document (if time allows).
  - c. As a follow-up plan and strategy that updates the 2016-2018 Economic Development Strategy currently in use. Importantly, tackling the issue this way would necessitate that such a document is rooted in and very closely hones to the policies adopted in the comprehensive plan. Once finalized, it should be incorporated into the City's comprehensive plan.
66. In this manner, three other considerations should be kept front and center for this work:
- a. Incorporating an economic development plan and strategy should be undertaken regardless of the fact that it is not a specific requirement of the Metropolitan Council.
  - b. The recommendations of that plan should be integrally tied to fiscal priorities, annual budgets and long-term budgetary strategy, as well as departmental workplans and where necessary, an update of the city's ordinances.
  - c. Similar additional chapters and/or follow-up plans could and should be created for the following topics:
    - (i) Civic Engagement
    - (ii) Arts and Culture
    - (iii) Public Facilities and the provision of public services
    - (iv) Energy, Environment, and Resiliency

Thank you again for the opportunity to provide feedback on this very important project. On behalf of the Payne-Phalen Community Council, we are most appreciative and sincerely grateful for all of the hard work and excellent policy direction of this plan. We look forward to using it as the basis for updating our District Plan in the coming year. If you have any questions or require further clarifications, please feel free to contact me.

Respectfully submitted,



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Executive Director

- cc. Luis Pereira, Planning Director, St. Paul Planning and Economic Development Department  
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Bill Dermody, Principal Planner, St. Paul Planning and Economic Development Department  
Athena Hollins, President, Payne-Phalen Community Council  
Board Members of the Payne-Phalen Community Council