Saint Anthony Park Community Council Comments on the Saint Paul 2040 Comprehensive Plan Approved January 10, 2019

The Saint Anthony Park Community Council shares the core values and objectives set out in the current draft of the Saint Paul 2040 Comprehensive Plan. If anything, we believe more can be done to strengthen resilience, sustainability, and equity in our city. In that spirit, we offer the following comments that especially relate to the Saint Anthony Park community, but that may affect city-wide policies.

The plan sets aggressive expectations for Saint Anthony Park. The tables set out in Appendix D to the Transportation Chapter show that the population of Saint Anthony Park will experience a 70% increase in population and a 68% increase in jobs over the 30-year period from 2010-2040. These far exceed the expected 21% growth in population and jobs city-wide. In fact, almost 28% of the city-wide increase in jobs are projected to be in Saint Anthony Park and adjoining industrial areas. Although not mentioned as a "place of potential" on page 10 of the plan, Saint Anthony Park is in fact one of the greatest places of potential in the city.

There are several factors that contribute to the potential of Saint Anthony Park. The Creative Enterprise Zone is a recognized center of creativity and enterprise located mid-city between downtown Saint Paul and Minneapolis. The Towerside Innovation District is a 370-acre area recognized by Saint Paul and Minneapolis as a unique opportunity to provide affordable housing and job creation affecting both cities and the University of Minnesota. The Metro Green Line and Interstate 94 linking these assets enable people from throughout the Twin Cities to access the housing and job opportunities of our community.

The expectations of the Comprehensive Plan for Saint Anthony Park cannot be realized without addressing a number of issues that are not fully developed in the current draft. Failure to move forward on these issues will represent a lost opportunity that will affect the future of our city.

Our comments relate to the indicated sections of the draft Comprehensive Plan.

<u>Introduction</u>

Many policies would provide more direction if they contained more specific ideas and commitments. Climate change is certainly one of the key "trends" the Plan needs to address, but this short paragraph leaves much out. Several of these points are described in the Policies but should be included here to better frame this issue. For example, to help the city remain livable when summer temperatures and humidity increase, more green space, greater tree canopy cover, facilitating installation of renewable energy (roof design guidelines, for example), support for conversion to highly reflective roofs, identification of cooling centers within reach of all residents. More generally, this theme should include mention of ways to prevent and minimize power outages, installation of public vehicle charging stations (note the misspelling of

"vehicle" in LU-13), increasing the number and accessibility of public gathering places to build community, parking restrictions and costs to promote use of public transit, etc.

In "Growth and Prosperity through Density" (p.12), we suggest you omit "well-designed." The rest of the sentence indicates the criteria to be met.

Land Use

Perhaps the greatest shortcoming of the current draft relates to reuse and redevelopment of the industrial areas in Saint Anthony Park and the Creative Enterprise Zone. The area is dotted with vacant land and former industrial buildings. There is pressure to redevelop the area parcel by parcel with uses such as one-story warehouses and public storage buildings that bring truck traffic to the area but do little to create on-site higher wage job opportunities for our working force. These types of uses should be prohibited. Our future as a diverse and equitable city must include job density as well as affordable housing. A new policy element should be inserted, perhaps after Policy LU-41 stating that, where industrial land is near transit, high job density should be required when property is developed/redeveloped.

Saint Paul needs to take action to preserve its industrial land for production, processing, and last mile distribution of products and services that have minimal pollution impacts on nearby residential areas and provide living-wage jobs. These businesses would include 21st Century urban manufacturing, innovation centers, and creative, coworking, artisanal, and maker spaces. See Chapter 7 in the Maker City book. The Comprehensive Plan as it relates to the industrial areas in Saint Anthony Park and the Creative Enterprise Zone should include action steps similar to those set out in Policy 3: "Production and Processing" of the Minneapolis Comprehensive Plan.

Redevelopment of the industrial area for 21st Century business must include action steps similar to those set out in Policy 98: "Innovation Districts" of the Minneapolis Comprehensive Plan, a copy of which is attached. This would include flexible zoning, not one-size-fits-all. The proposed ten-year plan for Saint Anthony Park calls for a new zoning overlay district in the Creative Enterprise Zone that encourages a variety and density of uses. This could include live/work arrangements in appropriate circumstances. Items 17 and 18 in Figure I-1 of the Implementation Chapter in the Comprehensive Plan call for studies somewhat along these lines over a leisurely 5-10 years, but market demand is not going to wait. The time to take action on creating the overlay district is now.

Reuse of the industrial areas and adjoining commercial areas of Saint Anthony Park and the Creative Enterprise Zone also should include opportunity for arts and creative spaces. Within the last year, arts organizations such as Springboard for the Arts, the Playwrights' Center, and the Textile Center have announced plans for new facilities in the Green Line Corridor. These uses will be a catalyst for more artistic and creative activities within Saint Anthony Park and the Creative Enterprise Zone. The Comprehensive Plan should include action steps similar to those set out in Policy 29: "Arts and Creative Spaces, Venues and Districts" of the Minneapolis Comprehensive Plan.

In addition to the overarching opportunities for reuse and redevelopment of our industrial lands, there are several other issues in the Land Use Chapter that warrant consideration:

- We understand the focus on increasing density at Neighborhood Nodes, but would like the Plan to recognize the value of increasing density elsewhere, appropriate to site. ADUs are one example, as are conversions of single-family homes to duplexes or triplexes.
- 2. Policy LU-4 is vague and would benefit by being more specific. What means and measures are being considered to minimize displacement?
- 3. To encourage cultural and arts-based businesses and business districts (LU-6.5) requires that we maintain and develop affordable workspace for artists, where art can be produced. Where redevelopment has occurred, artists have been forced to relocate, threatening their livelihoods and dispersing functioning artist communities. Many artists prefer to live separately from their studios, due to exposure to paint fumes, solvents, welding vapors, particulates, and so on. Market forces will not achieve the goal of equitable and sustainable economic growth; rather, the City needs to develop the policies, guidelines, and ordinances that will.
- 4. It is not clear to us what "historic resources" means in the context of Policy LU-6.10. Could this be more clearly described?
- 5. Include surface parking in district parking solutions ("district ramps and lots") and eliminate (do not simply reduce) parking minimums (LU-13). If it is not possible to remove parking minimums completely, remove them from residential buildings of 4 units or fewer.
- 6. Policy LU-16 incorrectly refers to Figure LU-6, but should refer to Map LU-6. This policy recognizes the conflicting rights of property owners one having the right to access to sunlight; the other the right to build to a height allowed by zoning or variance. In the cases where this occurs, the City could require that new development or redevelopment produce (not simply purchase) the equivalent amount of solar energy to the credit of the affected property owner.
- 7. In the Neighborhood Node section, we recommend "Neighborhood Nodes will be denser..." replace "The intent is for Neighborhood Nodes to be denser..."
- 8. We support placement of a "freeway lid" over Highway 280 between Franklin Avenue and Territorial Road as outlined in Policy LU-53 and T-39. This location is prime for commercial development complementing Court International, the adaptive reuse of the Case building, and the Westgate Office Park. This should be included as a Medium-Term priority in Figure I-1 of the Implementation Chapter. We also suggest a map be added to the Plan that indicates potential locations of these highway lids, including over 280 from Franklin to Territorial.
- 9. The Saint Anthony Park Community Council is already meeting with the Creative Enterprise Zone, Prospect Park Association, and Towerside Innovation District to develop the coordinated design guidelines referenced in item 16 on Figure I-1 of the Implementation Chapter. A city planner is encouraged to participate in the process.
- 10. Major redevelopment projects are in the works for the Luther Seminary land and Commonwealth Terrace land in and abutting North Saint Anthony Park that are not

- compatible with the uses shown on Map LU-2. For the initial concepts of the University of Minnesota, see page 24 of this file.
- 11. The view of the Minneapolis skyline from high points in north Saint Anthony Park, such as along Bourne Ave, Hoyt Ave, and Fulham St, and from the Luther Seminary campus, is a significant public view that should be preserved and enhanced. Development on what is presently the northern half of Luther Seminary campus should be designed so that streets and other public spaces in the development take advantage of the view. The view should be an amenity to everyone, not just the private homeowners and renters in any redevelopment of the campus. The map should guide the future, not look to the past.
- 12. The boundaries for Mixed-Use in the Neighborhood Nodes should allow for expansion where appropriate to improve access to goods and services.
- 13. Mixed-Use should be added to the Neighborhood Node at Snelling and Como on the A Line transit route. Additional Neighborhood Nodes should be added at all major cross-street intersections with light rail and current and future Arterial Bus Rapid Transit and streetcar routes. To make the city truly walkable and to build a sense of identity in all areas, everyone should be within a half mile of a Neighborhood Node. This could transform Saint Paul into a city of true neighborhoods.
- 14. Medium density housing should be allowed by right (as per Policy H-48), rather than simply "encouraged" in Urban Neighborhoods (Policy LU-33).
- 15. The proposal to create a separate system of business councils to "complement" the district council system as set out in item 21 on Figure I-1 of the Implementation Chapter needs further public discussion before it is incorporated into the Comprehensive Plan. The Saint Anthony Park Community Council has always included business representatives and we would encourage the city to foster cooperation between residents and businesses at the local level rather than competition.
- 16. Based on the surveys of businesses we have conducted, it is imperative that Implementation Item 13 be complete as soon as is feasible. Signage standards, limits to sidewalk use, permitting, and inspections all have been cost hurdles and impediments to establishment of new businesses.
- 17. We strongly support rapid completion of the Climate Action Plan (Implementation Item 14), in concert with input from residents, businesses, and organizations. Reducing global climate change and building resilience directly affect land use and all other considerations of the Comp Plan. The City should consider ways to facilitate and encourage action at all scales.
- 18. We ask that Implementation Item 18 be fast-tracked because it is this group of creatives, producers, and entrepreneurs that needs City support through zoning and other departments.

Transportation

We applaud the Goal 2, which is to improve safety and accessibility for all users. With regard to Policies T-5 and T-8, it is crucial to enhance rigorous enforcement of speed limits and stopping for red lights. The City should support the adoption of citing the vehicle owner for excessive speed documented by autonomous velocity and red light cameras. This is consistent with the

current ordinance that cites the vehicle owner for parking violations, but speeding and running red lights present much greater risk to public health and safety.

We also strongly support Policies 5 (Vision Zero), 21 (decrease in vehicle miles travelled), 29 (TDM), 31 (reestablishing the street grid), 32 (better transit access and bike parking), and many others that are listed below.

Redevelopment and reuse of the industrial area in the Creative Enterprise Zone carries with it the need to provide better access (Policy T-14). The proposed ten-year plan for Saint Anthony Park calls for Prior Avenue or Transfer Road to be extended to Energy Park Drive and possibly Como Avenue to make the industrial area attractive to new businesses. This would also give the Creative Enterprise Zone industrial area direct access to Highway 280 and Snelling Avenue, thus relieving traffic congestion on University Avenue, I-94, and local streets (Policy T-37). This connection should be added to Map T-14: Future Right of Way Needs and planning should be commenced in the near future. It is noted that this connection is already shown as part of the Regional Bicycle Transportation Network on Map T-4.

Saint Paul's Comprehensive Plan should also be cognizant of the plans for the Granary Corridor and Bridal Veil Regional Trail in Minneapolis. These include a bridge crossing the railroad tracks from Malcolm Avenue to Kasota Avenue/Energy Park Drive at the city limits to unlock land for economic development and relieve traffic congestion and will serve as a parkway to complete the Missing Link in the Minneapolis Grand Rounds. A two-page summary of the Granary Corridor study may be found at http://www.designcenter.design.umn.edu/projects/granary-corridor.html and the latest plans for the Bridal Veil Regional Trail may be found at https://www.minneapolisparks.org/_asset/895jfr/Chapter-4-Parks-Regional-Trail.pdf.

The proposed ten-year plan for Saint Anthony Park plan calls for the parkway characteristics of the Bridal Veil Regional Trail to be extended onto Energy Park Drive to connect the Minneapolis Grand Rounds to the Saint Paul Grand Round at Raymond Avenue. This would include off-road bicycle/pedestrian paths for public safety (see Policy T-6). Traffic should be reduced to two lanes with a third turn lane, consistent with the two lanes at Raymond and west of Highway 280. The park-like link between the Grand Rounds would be in keeping with Policies T-38 and T-40 of the Transportation Chapter. Work on this should be coordinated with the schedule for design and construction of the Bridal Veil Regional Trail in Minneapolis.

In addition to the need for better access to the industrial areas in the Creative Enterprise Zone and enhancement of Energy Park Drive to be a welcoming connection to the Bridal Veil Regional Trail, there are several other issues in the Transportation Chapter that warrant consideration:

- 1. We strongly support the "Road diet" approach wherever average daily traffic is less than 20,000, including on Energy Park Drive and Como between the U of MN Transitway and Snelling. We suggest that "where feasible" be replaced by specific guidance, such as roads with less than some ADT level.
- 2. Part of Vision Zero and putting pedestrians first is to let them cross the street safely when they have the right of way (Policy T-7). Great progress on this will be achieved by

- banning right turns on red citywide and to remove "slip" lanes for right turns. Decreasing vehicle speed results in markedly reduced accidents involving pedestrians. We recommend tabled crosswalks and speed bumps be used.
- 3. Routes for freight movement need to be improved in this District (Policy T-14) and strictly limited on roads near residential buildings. This is particularly important for hazardous materials, such as flammable and high vapor pressure liquids, fine-grained materials like sand used for hydraulic fracturing, and toxic chemicals. This requires routes to be designated and enforced, new routes to be built, and creative ways to help truck traffic coexist with residents.
- 4. We strongly support the use of pricing to manage parking demand and efficiency (Policy T-17). Permit-only parking should be charged at market rate for permit holders. We recommend the City expand the area that requires no parking minimum or eliminate it citywide.
- 5. For Policy T-27, which we support, we recommend the plan be more specific by establishing minimum job-density or FARs for buildings within a defined distance of light rail, aBRT, and possibly high-frequency bus routes.
- 6. It is curious that Policy T-34 (the second of the two with this number) is the only one to mention snow. Please commit the City to clear bike lanes and related pedestrian infrastructure, such as medians and slip lane refuges. Because pedestrians are valued in Saint Paul, there may be need for the City to take responsibility to more rapidly clear sidewalks of elderly, handicapped, and absent residents.
- 7. In support of Policy T-37, evaluate whether to prohibit semi trucks for delivery to local retail establishments not located on truck routes, with consideration of the economic consequences to the retailers.
- 8. With regard to Policy T-42, we are concerned that increased ride hailing and home delivery will result in blocked bike lanes and crowded intersections. We suggest you include a policy that creates delivery and ride-sharing drop-off zones per block that do not obstruct bike lanes and are not too near intersections.
- 9. The City should encourage true car- and truck-sharing to reduce VMT and greenhouse gas emissions, and improve sustainability. One approach would be to have the City underwrite liability insurance to allow individuals to do small-scale vehicle sharing.
- 10. Bike parking is mentioned in this chapter only in the context of special events. Please add a commitment to covered bike parking at or near light rail stations.
- 11. Map T-1 should note locations where sidewalks are missing from privately owned streets and areas. In our District, these include the north side of Carleton from Territorial to Long, and on Myrtle between Raymond and LaSalle.
- 12. The future bikeway along Wabash Street connecting Pelham Boulevard to the new park at Westgate and the Franklin Bikeway in Minneapolis should be shown on Map T-2. It should be included as a Short-Term item on Figure I-2 of the Implementation Chapter.
- 13. Territorial Road is labeled as a Minor Augmentor in Map T-11, but we request that the portion between Cromwell and Hampden be considered for reclassification as a residential street and, if it is, that it be rebuilt to complete street standards, with signage and enforcement that emphasize it is not a truck route.

- 14. We recommend the plan for right-of-way purchase for the Ayd Mill connection to 94 (Map T-14) be reconsidered. Rather, Ayd Mill Road should provide bike connectivity to support the Plan's multimodal, climate friendly goals. We are concerned that the cost of rebuilding it for cars and connecting it to I94 will leave little or no funding for other initiatives in the City. In the long run, it would be better used as a linear park with bike and pedestrian facilities and as a connection to other east-west bike routes, as indicated in Maps T-3 and 4.
- 15. There are several issues with Map T-15. There are areas shown as key freight facilities that are no longer used for such purposes. These include the KSTP building, the former Weyerhaeuser property, and the former Case property. The map should be updated to reflect current use. Information for Raymond Ave and Energy Park Drive is out of date; the low clearance bridge icon should be removed. An icon indicating inadequate turning radius is needed at 280/University interchanges. Semis cannot make the turn to EB 94 from Franklin Ave in normal traffic.
- 16. Map T-18 plots Transit Market Areas, but these are not defined in the Plan. There is no reference point for readers to understand what the map implies.

Parks, Recreation and Open Space

While most of the activity for the Granary Corridor and Bridal Veil Regional Trail is on the Minneapolis side of the city border, there are elements that extend into Saint Paul. As noted above, the parkway characteristics of the Bridal Veil Regional Trail should be extended onto Energy Park Drive to connect to the Saint Paul Grand Round at Raymond. In addition, Kasota Pond/Mallard Marsh on the Saint Paul side of the border is a part of the Bridal Veil Creek watershed and is under the jurisdiction of the Mississippi Watershed Management Organization. MWMO is taking an active part with the Minneapolis Park and Recreation Board in planning these improvements. The map on page 254 of the Minneapolis Park Master Plan includes a possible park on the Saint Paul side of the boundary next to Kasota Pond.

The opportunities to extend the parkway characteristics onto Energy Park Drive and to include Kasota Pond in the Bridal Veil Regional Trail require the cooperation of Saint Paul with other governmental agencies. We request that Saint Paul include these opportunities as part of its Comprehensive Plan and take an active part in bringing these opportunities forward. The possible park should be included on Map P-2 and the connection between the Grand Rounds should be included as a Proposed Regional Trail Search Corridor on Map P-3. Work on this should be coordinated with the schedule for design and construction of the Bridal Veil Regional Trail in Minneapolis.

In order to prioritize and locate new park and open space areas when seeking to achieve Policy PR-4, an additional map should be added to the appendix. This map should indicate the areas encompassed around all current and planned parks, recreation, and open space within a 10-minute walk. We encourage the City to define the distance based on the average speed a young child walks with a parent in 10 minutes, or by using an approach that will consider the walking speeds typical of some cultures, the aged, and those with mobility limitations. The map

also should consider limits to access, including crossing busy streets, lack of sidewalks, and other conditions.

Policy PR-40 could greatly facilitate use of our parks by residents, employees, and visitors. We encourage use of wayfinding projects that support local artists to develop permanent signage that meet minimum specifications by the City, yet promote vibrancy and local flavor.

In the Non-Regional Park and Trail Inventory, it seems misleading to use "South St. Anthony Rec. Center," because it is leased and managed by Joy of the People soccer program, and therefore, does not provide typical City programs. We encourage use of a different name or descriptor.

Housing

We strongly support the goals of the Housing Chapter. We suggest that the introduction acknowledges that single-family zoning has contributed to the undesirable outcomes of sprawl, racial segregation, economic disparity, air pollution, and greenhouse gas emissions.

In order to make housing more broadly available, we strongly encourage the City to promote affordable ownership (Policy H-33), and to focus some of your effort on new development in those areas of the City where owner-occupied housing is least affordable.

In Policy H-41, we recommend that official controls require affordability in every new development. Without this stipulation we fear that affordable housing will continue to be ghettoized.

We reiterate our support for H-48, allowing neighborhood-scale increases in density by right in Urban Neighborhoods.

Water Resources Management

Control of stormwater is a crucial part of building resilience to the increasing frequency of high-intensity rainfall events. We support the goal of minimizing stress on the stormwater drain system by infiltrating rainwater where it falls. Minimum Impact Design Standards should be required, wherever possible, rather than simply encouraged, as stated in Policy WR-18. In addition, we recommend an additional policy that emphasizes installation and maintenance of rain gardens on public property and on property near subsidized housing. These will serve to meet physical needs (stormwater infiltration) and educational needs (by increasing awareness and appreciation among disadvantaged residents about water protection; Policies WR-3 and15).

Policy WR-8 deals only with gains and losses of ground water. The legacy and extent of industrial contamination in our District is evident in the map on p.94 of the Appendix to the <u>City of Saint Paul's 2017 Stormwater Permit Annual Report</u>. MPCA has identified sources of perchloroethylene and trichloroethylene in the soil and ground water. These compounds move with ground water and vapors can enter buildings, similar to radon. A detailed map of ground water elevations and flow directions is needed to evaluate risk to public health in nearby

residences and businesses. It also is possible that the shallow, perched ground water body in this area may impact water in the storm sewer via I&I. This industrial area, and potentially others in the City, should be targeted for investigation with a new Priority under Goal 1 or 3.

In the Kasota Ponds (Highway 280 Ponds), Saint Paul's westernmost open water bodies and associated wetlands, chloride is a primary contaminant. As part of WR-17, we urge the City to work with MNDOT and nearby property owners to prioritize deep reductions in road salt application. There are numerous outfalls to this connected group (Map WR-3), so reduction in salt application needs to extend to the surrounding watershed drained by these storm sewer pipes. Another aspect of Policy WR-17 is street sweeping. In the short term, the City should undertake regular educational efforts to notify all residents and landlords about their responsibility to remove fallen leaves from their property and to desist from sweeping leaves into the street.

In the first paragraph in the Inflow and Infiltration sidebar, the word "plans" in the phrase "...overload treatment plans and cause bypass events..." seems to be missing a "t".

More detail could be provided in the Implementation chapter on the work planned in water resources. As it is, the message is "continue to do our work," but there is little direction regarding short-, medium-, and long-term timelines. What are the pressing needs?

Heritage and Cultural Preservation

As an example of the need for Policy HP-10, we would like a separate policy in the Transportation section regarding sustainable streetscapes, including streetscape art. We have been saddened by the loss of iconic, placemaking structures along the business section of North St. Anthony Park during the Como Ave replacement. The two bus shelters and kiosk had given a flavor to the area with which residents identified. Loss of the kiosk, in particular, removed a key community-building function, where residents, employees, and visitors could learn about events and community meetings, lost pets, requests for help, offers of service or items for sale.

This is only one example of the need to include City staff who have a sense of cultural and artistic values in all projects that are otherwise focused only on engineering requirements. Similarly, when the City supports public art, it should encourage some projects to have a long lifespan. It is uplifting when an artist-designed bench appears along the sidewalk, and dispiriting when it is taken away a few years later. If the City's affirmation really is to be "The most livable city in America," we need to keep the sense of place we have, and build it where we don't.

Note that in the sidebar "Definitions" on p.205, The term Reconstruction should be highlighted and made a separate paragraph.

One of the greatest inadequacies of the Plan is that it lacks serious consideration of environmental quality, environmental justice, healthful living, healthy ecological systems, and

wildlife habitat. Here, we raise only one of the many issues involved, but encourage the City to address them throughout the Plan.

The quality our air affects the quality of our lives. In particular, it is recognized that wood smoke contains particulates and chemicals that are harmful to health, especially for people with asthma, emphysema, and other breathing problems (Ask the MPCA: Burning leaves and branches in St. Paul). As we understand it, burning wood and leaves in open fires outside is not restricted when conditions would exacerbate human exposure to the smoke (like air temperature inversions), nor are there restrictions on when an inside fireplace may be used. Livability requires a healthy environment, and high air quality should be promoted in our city.

Thank you for your consideration of these comments on the Saint Paul Comprehensive Plan. We desire to work with you to achieve the ambitious goals you have set out for our community and our city.



On December 18th, members of the Saint Paul Bicycle Coalition and other members of the public met for our monthly meeting, and discussed elements of the City of Saint Paul's draft 2040 Comprehensive Plan, with special focus on the Transportation section. Our comments on the draft are as follows:

- Many of the plan's safety goals rely on a standard of "feasibility" (e.g. "implement road diets... where feasible"). In our opinion, such phrases give immense discretion to city and county Public Works departments to determine what is or is not feasible and to act contrary to the larger goals of the document. Therefore, these policies should be worded less conditionally, without these "escape clause" words, to place greater weight on the larger goals of the document.
- Goal 3, involving freight and especially truck freight, should place more emphasis
 on moving truck traffic away from routes on walkable and bikeable urban streets.
 These trucks have difficult geometry and immense mass, which makes them
 especially deadly in the event of a crash and they often necessitate street
 designs (like "Slip turns") that are inherently unfriendly to bicycles and
 pedestrians. Pedestrian and bicycle friendly street areas should be served by
 smaller and more maneuverable vans and other solutions.
- Policy T-19, which emphasizes the Mississippi River as a working river, should concede protections for natural areas of the river bottoms vulnerable to industrial encroachment, especially in the vicinity of Pigs Eye Regional Park.
- Policy T-21 should be specific in how it will achieve reductions in VMT in Saint Paul including a discussion of how new street and highway lanes can produce "induced demand" and result in more traffic and traffic congestion.
- Policy T-28 should encourage bike racks or other secure bike parking at multimodal hubs.
- Policy T-32 should remove the "generally" proviso, or require meaningful detours with workable temporary bicycle/pedestrian infrastructure and not merely signs on busy, dangerous streets.

In general, the Plan should be revisited to ensure that language is as clear and direct as possible in guiding decision-making over the next decade. These questions are too important to be left to interpretation.

Sincerely, Andy Singer Co-Chair, Saint Paul Bicycle Coalition **From:** Tom Darling [mailto:tsdarling@earthlink.net]

Sent: Monday, January 14, 2019 4:12 PM

To: Thompson, Lucy (CI-StPaul) **Subject:** Comment on 2040 plan

Dear Ms. Thompson: I just tried to submit the following comment via the City website but when I press submit it said the topic was closed. I understood that comments would be taken until 4:30 today. I may have been wrong. In any event. My comments are set out below.

My name is Tom Darling. I live at 445 Summit Avenue. I am a member of the board of the Summit Avenue Residential Preservation Association (SARPA). The following comments are a brief recap of my comments at the recent public hearing on the 2040 Plan.

Summit Avenue is special. It is an asset not only for those who live on or near it but also for the entire city and, indeed, the whole metropolitan area. All of Summit Avenue is special but that specialness is fragile and it will not last without careful, devoted and specific attention. SARPA provides that attention to the entire avenue but SARPA efforts are hampered by the fact that Summit spans at least four separate district councils so that no official city group speaks for the entire avenue. Thus, a development may seem relatively benign to a district council looking at just a small part of the avenue and so that district council does not object. However, if that same development were considered in light of its impact on the whole avenue it would be considered objectionable. To help combat this I believe that as part of the 2040 plan (or otherwise if need be) a new district council should be created with the responsibility of advocating for all of Summit Avenue. Today, in 2019, we can say honestly say that: "Summit Avenue is special". Unless St Paul is incredibly diligent, however, in 2040 we will be forced to say: "Summit Avenue used to be special". Creation of a special district council for Summit would be one small step toward avoiding that fate. Thank you. Tom Darling

-Tom Darling
tsdarling@earthlink.net

Tom Dimond

2119 Skyway Drive Saint Paul, MN 55119

2040 Comprehensive Plan - General Comments

Our 2040 Comprehensive Plan should reflect the wishes of neighborhood residents. It should excite Saint Paul families about the future and highlight the unique nature of our different neighborhoods.

We must demand nothing less than a city where:

- * all neighborhoods have high quality attractive housing that serves people of all incomes
 - * well maintained streets
 - * frequent 24 hour high speed transit, including LRT and commuter rail
 - * extensive trail system that serves all neighborhoods
- * over and underpasses to provide much needed connections and greater safety
 - * bikeways
 - * beautiful open space
 - * active recreation opportunities along the full length of our river
- * high quality and diverse recreational opportunities from soccer to bird watching
 - * protected natural areas
 - * equitable transit investment
- * access to good paying jobs and world class educational opportunities A city where no neighborhood is treated as less deserving than any other. A city where neighborhoods embrace their unique differences and are the best they can be.

Wherever you go in Saint Paul we should feel safe including clean air, clean water, clean soil, and safe hiking and biking paths. Fairness and equity means all neighborhoods matter and the equitable sharing of City resources. Funding and allocation of resources must address current inequities. Economic diversity is at its best when we provide a helping hand and prioritize the needs of struggling neighborhoods to become safe, healthy, and attractive neighborhoods. Concentration of poverty is not an equitable strategy. We must embrace the vision of economic diversity and a broad spectrum of residents in all neighborhoods. This requires a support system to ensure all can find the opportunity to live in safe and attractive neighborhoods.

Home ownership is an important option that can help families gain greater financial stability and family assets. Home appreciation often helps provide the financial stability as people age or to assist families in paying for children's education. All families should have the opportunity for home ownership if they choose. All deserve safe, healthy and attractive neighborhoods that enhance our quality of life. Safe, healthy and attractive neighborhoods also help to protect the value of what is the largest investment most families will ever make. It also helps homeowners get financing to make home improvements. Neighborhood reinvestment should be a top priority of the City. Vacant and foreclosed properties can be very detrimental to neighborhood livability and vitality.

Allowing a neighborhood to deteriorate and crime to increase is not an acceptable answer to affordable housing. Naturally occurring affordable housing is clever word smithing but there is no such thing. Housing values are not tied to age or some other natural phenomena. Some of the most valuable homes are some of the oldest. Homeowners benefit from appreciation. When home values do not appreciate or devalue in specific neighborhoods, compared to the City as a whole, it penalizes those who live there. Minorities and low income families are often the ones who pay the greatest price of neighborhood deterioration and disinvestment.

A home in Highland can sell for double or triple what the identical home sells for on the Eastside. This might seem like a good thing, but we should ask ourselves what drives people to do this. The answers should drive efforts to eliminate inequities between neighborhoods. Concerns about crime, neighborhood deterioration, surrounding land use, limited recreational opportunities and other factors play a large role in housing values. Impressions, real or not, drive values up or down. It does not just happen. Individuals can do their part but only the City can address neighborhood livability deficits and ensure all neighborhoods do well. Only the City can protect property values based on zoning, building codes, public investment, and equitable implementation of plans and regulations. As long as we have a free market housing system the comparative property values of a neighborhood generally reflect the public's judgment of the neighborhood. All residents deserve to live in safe and attractive neighborhoods. We should settle for no less. As Paul Wellstone said: We all do better when we all do better.

A good example of inequity in how we treat areas of our City is Pig's Eye Lake Regional Park. Pig's Eye Lake is a crown jewel of our National Park. We are fortunate to have the largest lake in Saint Paul on the Eastside. We are fortunate that it is part of a National Park, State Critical Area, and includes a State Scientific

and Natural Area. On the other hand, the lake and park have suffered greatly because it is on the Eastside.

All of the land and water between the bluffs and Mississippi River on the Eastside were part of Saint Paul's park plans when Saint Paul protected the riverfront along Mississippi River Boulevard. Instead of enhancing and protecting our Eastside natural resources, the City used our riverfront as a dump. Under Saint Paul's actions or inactions the City is directly responsible for creating a superfund site with cleanup costs of \$800 million.

In more recent years, the City drove steel pilings and filled additional wetlands. The filled areas are largely used to store and handle hazardous material and waste materials including hazardous material removed from the Minneapolis riverfront because of a Minnesota Pollution Control Agency settlement. Neighbors, the MPCA and the City of Minneapolis worked for years to get these dangerous materials off their riverfront. The Port Authority of Saint Paul enticed the company to dump the materials on the Eastside riverfront without any input from Eastside or West Side residents.

The Port Authority has an unfortunate history of destroying valuable natural areas and lobbying against natural resource protections. This has never been more true than the Eastside and Westside. Currently, the Port Authority is attempting to fill 17 acres of lake and parkland to build four rail lines cutting the park in two. These impacts take a toll on neighborhood resident's livability. It is an endless attack on the natural resources of our community that our Comprehensive Plan should speak out against. It is a death of a thousand cuts and we are literally paying for this destruction with our taxes. Residents suffer the greatest and most immediate negative impacts, but the continuous degradation of our natural resources hurts us all. The Port Authority has voted for taxpayer assistance to aid this project that destroys parkland in a State Critical Area and National Park. The destruction of our parkland benefits two profitable foreign companies who import foreign product that competes with American product.

Our Parks department during the Dutch Elm era used Pig's Eye Regional Park as a wood chipping facility. They assured the neighborhood this site would only be used for chipping City trees and would be removed as soon as the Dutch Elm trees were removed. That never happened. Instead it was converted into a private commercial wood chipping business on park property. The wood chipping operations block public access to the lake and park. A large area of the park is off

limits to public use and access is restricted because of those operations and material storage in the park.

When Mayor Chris Coleman was elected he agreed to remove the wood chipper from the park. He set up a committee to plan the relocation of the chipper off parkland. A lot of work was done. Unfortunately he disbanded the joint citizen and city staff committee.

Pig's Eye Parkway, hiking and biking trails, habitat restoration, bird viewing area, canoe/kayak landing, parking lot, and picnic area are just some of the park enhancements that have never seen a dollar of investment by the City. In the mean time, the City acquired Lillydale from Ramsey County and has poured millions into it. Taxpayer funds cleared the town and infrastructure, developed a parkway, trails, parking, boat launch, and other amenities. Saint Paul converted three industrial areas into the riverfront parks of Victoria Park, Upper Landing and Lower Landing.

The City has demonstrated at Lillydale, Victoria Park, Upper Landing and Lower Landing the value of restoring natural resources, and creating parkland, residential and commercial from cleaned up industrial sites. The City points to them as great successes. How is it equitable for Eastside residents to pay taxes to enhance every other neighborhood but we are denied the same opportunities? The Eastside must have the same opportunities to create the highest and best use on our riverfront. Cleanup, enhancement, and protection of our riverfront and other natural resources is essential to a sustainable future. Cities around the globe are embracing this effort and seeing significant benefits from their efforts. Our future depends on our enhancing and protecting all of our riverfront.

There is a lot of talk in Saint Paul about equity but little to demonstrate it. For years, Saint Paul has extolled the virtues of removing scrap metal yards, chemical storage tanks, grain elevators, rail yards, and other industrial use from our riverfront. Saint Paul has advocated for the highest and best use of our riverfront. Minneapolis is seeing a huge reinvestment and revitalization of its riverfront that has attracted a large influx of residents, jobs, and tax base. After decades of paying to clean up riverfront industrial in other neighborhoods and see the great results of increased tax base, jobs, housing and a clean environment the Comprehensive Plan would make it harder for the Eastside and Westside to do the same.

The City should not locate hazardous material facilities in our neighborhoods without prior notification of neighbors. Our Comprehensive Plan should enhance the livability of all neighborhoods and the wildlife who share this planet.

Policy LU-2 - redevelop "Opportunity Sites" as higher density mixed use development or employment centers - remove Totem Town from the list of sites (pages 29 & 45)

LU-17 - add - Support use of undeveloped right of way to support pedestrian and bicycling activity (page 31)

LU-20 - add - "and habitat" after natural resources (page 32)

LU-36 - remove - "while minimizing the reduction of tax base" This is not needed and parks enhance the tax base by enhancing the value of surrounding properties (page 35)

LU-39&40 - substitute - substitute "Natural Ecosystem" for Semi Rural (page 35)

Industrial - substitute - "Some industrial" - add - "The City supports the conversion of industrial property use to provide the greatest number of jobs and tax revenue and will work to eliminate tax exemptions." If the City is interested in increasing the tax base and number of jobs the City must focus on industrial that has a higher number of jobs per acre and higher property taxes per acre to maximize jobs and tax revenue. Some industrial is not much more than storage lots that provide few jobs and limited taxes. Some industrial pays limited taxes because of tax exemptions. The City must eliminate industrial tax exemption to maximize tax revenue. (page 35)

LU-43 - substitute - "Lowertown, Upper Landing, and University and Raymond are excellent examples of providing jobs, housing, and increased tax base from conversion of use. Evaluation of conversions will consider the jobs, housing and tax base of proposed conversions." A prohibition of conversions would have prevented some of the most successful efforts to revitalize our City. (page 35)

LU-52 - delete - surface parking lots in the Capitol area are used to provide parking for State offices while holding the land for future State offices in the Capitol City

LU-53- support - "freeway lids" and landscaping (page 53)

LU-54 - delete - the City should not be "protecting" the railroads from noise, traffic, wetland filling and other negative impact concerns raised by residents of our City (page 53)

LU-55 - add - "and natural resource protection and enhancement" after urban development (page 53)

T-14 - add - " and provide pedestrian, and bicycling bridges over transportation to connect neighborhoods to the riverfront" (page 56)

T-20 - substitute - "Eliminate public taxpayer subsidies for foreign corporations, require market rate fleeting fees (barge parking), eliminate no property tax and reduced property tax exemptions for profitable foreign corporations. Transfer fleeting fees to Parks to fund public river corridor parks and trails." We should quit providing millions in public taxpayer subsidies to large private corporations at the same time our parks system is being privatized. (page 57))

T-38&39 - support - land bridge might be a better name than freeway lid (page 58)

T-40 - add - add a new category "Greenway" that is the same as a parkway with the one exception of allowing truck traffic. This would provide the benefits of a parkway while allowing trucks on Warner and Shepard Roads. (page 58)

Page 75 - remove Kittson extension (page 75&76)

Page 80 - Midtown Greenway extension into Saint Paul - support - this should be a high priority (page 80)

Page 100 &102 - does not show a trail along Point Douglas Road, Pig's Eye Parkway, in Pig's Eye Park from the north entrance to the connection with Henry Park and Fish Creek, Battle Creek, Lower Afton, Fish Creek and Mounds Park pavilion to Pig's Eye Lake via the Fish Hatchery. They should be included. (pages 100 and 102)

The protections and zoning for Highwood should remain in place. They have served the neighborhood and City well. It is a very special place. The city should protect this area for the benefit of future generations and it's place in the State Critical Area and National Park. It is easy to destroy our world. The hard work is protecting it.

The 2040 Transportation Plan should foster advanced technology transportation systems, with high speed just on time delivery. There are great advances coming in trucking including self driving and electric. In 2007 trucks moved 390 million tons of freight in MN. In 2030 they are expected to handle 430 million tons. Truck freight is expected to account for \$1.5 trillion in freight value in 2030.

Rail carries the greatest volume of bulk materials. The railroads are the cleanest and most fuel efficient way to ship bulk products. Railroads are testing battery locomotives. Tier 4 locomotives are making huge strides on air quality and fuel efficiency. Five percent of our nations rail freight already travels through Saint Paul. Rail moved 240 million tons of freight in MN in 2007. In 2030 it is expected to be 300 million tons.

Air freight carries high value fast delivery freight. Air is expected to be \$5.2 billion in value and 600,000 tons in 2030.

The antiquated freight system whose shipments are the only one projected to shrink are waterways which are projected to shrink by 25%. Water is 1% of MN freight movements by value and the bulk of that is Lake Superior. All other freights systems operate 12 months of the year. Four months of the year the product is already shipped on rail or truck. The sooner the City recognizes this the better.

Our riverfront land can support, higher density, high value, residential, commercial/industrial land use that maximize property tax revenues, maximize high wage jobs per acre, adds value, and are more environmentally friendly with fewer impacts to our land, water and air. Movement of people with an expand set of options by transit, auto, motorcycle bike, trail can help expand options with the least environmental impact and greatest health benefits for the specific travel. The plan should support higher density commercial/industrial development so jobs and taxes increase without an expanded footprint that would limit opportunities for housing and open space. The transportation plan should foster sustainable development while supporting a shift to more ecologically friendly and

environmentally sustainable.



UNION PARK DISTRICT COUNCIL

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January 7th, 2019

Ms. Lucy Thompson City Hall Annex 25 W. Fourth Street, Suite 1300 Saint Paul, MN 55102

Dear Ms. Thompson,

At its January 2nd, 2019 meeting the full Union Park District Council voted to support the assertion by the Lexington-Hamline Community Council that the treatment of the intersection at Selby and Dunlap as a Neighborhood Node in the City's draft 2040 Comprehensive Plan is inconsistent with the Union Park District Council's Community Plan.

The Union Park Community Plan states,

"Smaller scale residential and smaller scale commercial uses are the most appropriate uses for the predominantly residential mixed-use corridor of Selby Avenue between Lexington parkway and Ayd Mill Road. If new development should occur in this segment, it would preferably occur at existing commercially-zoned nodes " (LU1.4).

The Union Park District Council feels that the Neighborhood Node designation is not in alignment with the above provision as it applies to the intersection of Selby and Dunlap and should be removed from the city's draft 2040 Comprehensive Plan.

Please let me know if you have any questions.

Sincerely,

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Brandon Long, Executive Director

Union Park District Council





December 5, 2017

To the Members of the City of Saint Paul's Planning Commission:

I was asked by City Planner Kady Dadlez to provide supplementary information regarding the proposed amendment to the Union Park Community Plan.

In brief, this amendment was produced through additional community engagement which was requested by city planners to address specific points regarding land use in Union Park.

In October of 2015, the Union Park District Council (UPDC) approved language for their Community Plan that called for increased density levels on Selby Avenue between Ayd Mill Road and Lexington Avenues (LU3.2) and to support zoning studies and adjustments along Selby Avenue east of Snelling to encourage more traditional neighborhood, mixed-use zoning where appropriate (LU1.1). The Lexington-Hamline neighborhood within Union Park contains the portion of Selby Avenue that was referenced by the Plan and residents were concerned that this language did not represent appropriate treatment for the predominately residential street. On Selby Avenue between Ayd Mill and Lexington Avenue, there are eighty single-family homes, sixteen duplexes, and eight lots with commercial use. Because there are stops for Metro Transit Bus Line 21, this is a transit route and was therefore identified in the UPDC Community Plan as a place for increased density.

After the Lexington-Hamline Community Council (LHCC) held a Town Hall Meeting on March 8, 2016 to discuss future development on Selby, Saint Paul City Planners Hillary Lovelace and Kady Dadlez directed UPDC and LHCC to conduct additional community engagement to inform provisions regarding Selby Avenue. The Planning and Economic Development Department staff of the City of Saint Paul did not think a small area plan nor a zoning study would be appropriate in this case. A provision was added to the Community Plan by UPDC which states "Union Park District Council, in conjunction with Lexington-Hamline Community Council, will initiate a community process to determine priorities for the future of Selby Avenue from Ayd Mill Road to Lexington Avenue that evaluates appropriate uses and zoning districts" (LU1.4). Other references to this location were removed from the draft plan to allow for engagement results to inform an addendum pertaining to these four blocks.

Staff from UPDC and LHCC met with City Planner Kady Dadlez in June 2016 to determine the community engagement process. Three opportunities were identified for collecting input via a paper survey: a table with information at the LHCC Ice Cream Social, a community input meeting regarding development along Selby, and door-to-door surveying along Selby Avenue and adjacent blocks. The results from the surveys collected can be viewed in the included spreadsheet. A total of 58 surveys were collected by UPDC and LHCC staff and volunteers. The LHCC board of directors submitted a conclusion statement to the UPDC board of directors. With guidance from PED staff, the UPDC staff gathered representatives from UPDC and LHCC to revise the conclusion to both accurately reflect the results of the findings and be in alignment with the City's Comprehensive Plan. The following statement was determined to replace LU1.4 in the UPDC Community Plan rather than serve as an addendum.

Smaller scale residential and smaller scale commercial uses are the most appropriate uses for the predominantly residential mixed-use corridor of Selby Avenue between Lexington Parkway and Ayd Mill Road. If new development should occur in this segment, it would preferably occur at existing commercially-zoned nodes.

Consistent with the City's Comprehensive Plan, the statement utilizes a targeted growth strategy for sustaining character in a single-family neighborhood.

Target Growth in Unique Neighborhoods

This strategy focuses on sustaining the character of Saint Paul's existing single-family neighborhoods while providing for the growth of mixed-use communities. New development in Neighborhood Centers, Corridors, the Central Corridor, and Downtown is intended to create communities where housing, employment, shopping, and community amenities, supported by transit, work together to provide for the needs of the people who live and work in them (City of Saint Paul Comprehensive Plan, LU6)

The statement is also consistent with the City's Comprehensive Plan regarding established neighborhoods.

Substantial growth is not expected in all neighborhoods. Established Neighborhoods are residential areas of predominately single-family housing and adjacent neighborhood-serving commercial uses. These are areas of stability where the existing character will be essentially maintained (City of Saint Paul Comprehensive Plan, LU7).

Finally, the statement reflects the City's Comprehensive Plan's preferences for smaller scale commercial uses in predominately residential mixed-use corridors.

Support a mix of uses on Mixed-Use Corridors. Mixed-Use Corridors may be either predominately residential or predominately commercial. Predominately residential corridors will have smaller scale commercial uses, while predominately commercial corridors will have housing interspersed with commercial office uses and retail goods and services (City of Saint Paul Comprehensive Plan, LU1.24).

I hope this summary is useful as background and support for the amended provision for the UPDC Community Plan that will clarify appropriate development for the next ten years.

Respectfully,

Amy Gundermann, Executive Director

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Lexington-Hamline Community Council

To the Land Use Committee of Union Park District Council:

The Lexington-Hamline Community Council's board of directors requests that the Union Park District Council submit a letter to the City of Saint Paul's Department of Planning and Economic Development on behalf of the community. We request that UPDC address the inconsistent treatment of Dunlap and Selby in the City's draft 2040 Comprehensive Plan in relation to the Union Park District Council's Community Plan.

A Neighborhood Node has been identified at Selby and Dunlap. (The draft 2040 Comprehensive Plan erroneously refers to it at Selby and Milton in the list on page 33, but accurately includes the Node on Map LU-2, according to Principal City Planner Anton Jerve.) According to the Comprehensive Plan,

"The Neighborhood Node designation is based on locations planned for higher-density, mixed-use development in adopted small area, neighborhood and master plans; community feedback on locations with market potential and neighborhood support; review of current zoning designations; analysis of current and future land use; and locations of existing or planned transit" (33).

The Union Park Community Plan states,

"Smaller scale residential and smaller scale commercial uses are the most appropriate uses for the predominantly residential mixed-use corridor of Selby Avenue between Lexington parkway and Ayd Mill Road. If new development should occur in this segment, it would preferably occur at existing commercially-zoned nodes" (LU1.4).

The language for LU1.4 was determined through an extended joint community engagement process conducted by Union Park District Council and the Lexington-Hamline Community Council at the request of City Planners Hillary Lovelace and Kady Dadlez. More about this process and reasoning is described in my letter to the Planning Commission dated December 5, 2017 (included).

This provision was approved by the Planning Commission on February 23, 2018 and by City Council on April 4, 2018 as an amendment to the full Union Park Community Plan.

The Neighborhood Node designation is not in alignment with the above provision as it applies to the intersection of Selby and Dunlap and should be removed from the city's draft 2040 Comprehensive Plan. Thank you for your help in this matter.

Respectfully,

Amy Gundermann, Executive Director Lexington-Hamline Community Council

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. I wrote this before a terrible vehicle/pedestrian accident. One person was killed and another hospitalized with serious injuries. The loss of life and challenges the survivor faces illustrates the need for more grade separated park connections. The grade separations can be overpasses or underpasses depending on grade but need to be incorporated in the plan. The crosswalk in this case was not grade separated. Elevation changes, transportation corridors, ravines, bluffs, creeks, and wetlands in our part of the City require an extensive system of off road grade separated pedestrian, wildlife, and bike corridors.

Speeds on many streets is also an issue. Speed limits keep being increased without adequate consideration of pedestrians and wildlife. It can be sobering when you stand in the sidewalk waiting for the light and a car flies by. Along many streets you have to walk on the shoulder of the road. Separating pedestrians and bicyclists from the shoulders of the road is particularly important along Point Douglas and McKnight. Point Douglas is the Mississippi River Trail (MRT). It is a trail from Lake Itasca to the Gulf of Mexico. Point Douglas is the only section in Saint Paul that does not have separation from the road. There is a real need to implement stop signs, warning lights, walking and biking separated from roadway, and grade separated walk ways and bikeways particularly along Point Douglas, and McKnight Road that should be linked with off road hiking and biking trails that provide the east west links between McKnight, Point Douglas and the riverfront. The planned bluff trail in Highwood and the grade separated crossings at Henry Park, Fish Creek, Lower Afton and Pig's Eye Parkway/DNR/Mounds Park are vital to providing riverfront park access and saving lives.

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 bridges to Pigs Eye Regional Park, the riverfront, and MN DNR Regional Headquarters/Fish Hatchery.

Reopen the boat launch in Pigs Eye Regional Park at the north end 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 Park property. It is located in and blocks the north entrance to the park. It limits access for some and prevents access to the park for most people. It also takes up a lot of space that could be used by park visitors and wildlife.

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. Wetland lost in the National Park should be replaced in the National Park.

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.

Encourage the use of the lake for rowing training and events.

Work with the Metropolitan Council to transfer lands outside the waste treatment plant berm to the park.

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

In Highwood, utilize undeveloped right of way for pedestrian/bicycle trails to the greatest extent possible.

Provide hiking and biking trails that are separated from road (Mississippi River Trail along Point Douglas Road)