

	OFFICIAL PUBLIC COMMENT NOV 2 - JAN 11 Source	Chapter	General Comments	Lang. Chng? (Y/N)	Notes	Staff Recommendation	Pg #	CNPC Recommendation
1	Derek Thompson	General	As a young person, this plan represents exactly what I want in a livable community.	N	Comment acknowledged.	None		
2	Derek Thompson	General	I want to live in an equitable city so that every part of the city is able to thrive. I believe all these changes will make St Paul a more prosperous city for all it's residents.	N	Comment acknowledged.	None		
3	TYLER REDDEN	General	A comprehensive organics program needs to be developed within St Paul, the most sustainable being the Blue Bag Organix Program offered through Organix Solutions. This solution can be utilized by any hauler with the use of their organics recycling bags that withstand the compaction of a garbage truck. Mandating the use of this program will prevent a SSO program from adding a new garbage truck to the roads (for each garbage company), reducing carbon emissions and pushing St Paul towards zero waste. The infrastructure needed for this is easily implemented by haulers and there is a definite demand from homeowners and renters. Organic waste is about 33-50% of the waste stream, so utilizing this easily applied program throughout St Paul by all haulers would reduce waste, create a valuable commodity, and extend the life of landfills (and make WTE options like the HERC more efficient). A long term strategy of utilizing the Organix Solutions "Layered Approach" methodology would be a natural next step following this organics program, but the Blue Bag Organix Program (also available as the Green Bag Organix Program) should be implemented using the company's funding model that is highly intuitive and builds in the program costs! I would be more than happy to answer any and all questions about sustainability if needed - my cell is 651.497.1611. Thank you for your time, I look forward to seeing how we handle organics upcoming and hope my knowledge and experience as a University of Minnesota graduate and Sustainability Studies/Environmental Sciences Major can help!	N	This is valuable input into the City's Climate Action and Resilience Plan, currently being prepared by the Chief Resiliency Officer in the Mayor's Office.	None		
4	Filsan Ibrahim	General	I'm wondering why waste isn't mentioned in the plan and is it too late to add a waste section on to the plan?	N	A separate plan, the "Climate Action and Resilience Plan," is being prepared by the Chief Resiliency Officer in the Mayor's Office.	None		
5	Thomas Kottke	General	The St. Paul 2040 Comprehensive Plan is a well thought-out document with a vision and core values that identify the appropriate priorities in the face of change and challenge. Climate change will be a very significant challenge for the community as will concentrations of poverty.	N	Comment acknowledged.	None		
6	Thomas Kottke	General	The population is increasingly diverse, and it will benefit the entire population if every resident has access to education, jobs, and a fair and equitable experience.	N	Comment acknowledged.	None		
7	Thomas Kottke	General	The planners, consultants and residents who contributed to the development of this document are to be congratulated.	N	Why, thank you!	None		

8	Kory Andersen	General	Thanks again for all the work you all are putting into this. I know it's a hard process being a planner myself. You can't make everyone happy, but you can make Saint Paul a city that is fully ready to deal with the REAL challenges of the coming decades by being bold now. Keep up the good work!	N	We will!	None		
9	District 1 Land Use Committee	General	The District 1 Land Use Committee has had the opportunity to meet with City planners and review the various drafts of the Comprehensive Plan over the past year. We appreciate the engagement efforts that have accompanied this process and feel that we have been able to review the plan in an informed way.	N	Thanks!	None		
10	District 1 Land Use Committee	General	We first want to acknowledge the gravity of a document like the Comprehensive Plan. We inherit a legacy of zoning and land use policies that were used to advance the interests of white homeowners and protect white privilege by directly and indirectly designating where different racial groups were allowed to live in our city.	N	Comment acknowledged	None		
11	District 1 Land Use Committee	General	Saint Paul residents’ access to jobs, fresh food, educational opportunities, and healthcare directly impact their physical and economic wellbeing.	N	Comment acknowledged	None		
12	District 1 Land Use Committee	General	We understand that we are facing an historic existential crisis caused by climate change. These are profound issues that cannot be addressed solely at the local level. However, policies enacted at the City-level, including those codified in the Comprehensive Plan, are a critical piece in addressing these issues.	N	Comment acknowledged	None		
13	District 1 Land Use Committee	General	We support the overall scope and content of the draft plan. We do have comments about some general topics. First, we feel there should be a consistent definition and measurement of equity so that all policies are headed in the same direction concurrently. ACP50 is an imprecise tool at the city- and neighborhood-level as it is a yes/no designation that changes year-to-year and can miss pockets of significant poverty within an otherwise affluent area due to the census subdivision it is measured at. The plan should also acknowledge the problems associated with racially concentrated wealth in addition to its discussion of the challenges from concentrated poverty.	N	Imperfect as it is, the ACP50 designation is the best measurement "tool" we have at this point to determine whether the City is making equitable investments in physical systems across the city. As implementation metrics are refined, we can do a better job of defining and monitoring our success in meeting our equity goals. the commenter raises an interesting issue re: the concentration of wealth. There are several policies throughout the Plan that support mixed-income neighborhoods.	None		

14	District 1 Land Use Committee	General	We finally would like the impacts of, and responses to, climate change better articulated in the plan. Climate change will impact the city in ways not seen before. Significant rain events in warmer months and a continuous freeze-thaw cycle in cooler months could devastate and overwhelm city infrastructure. The region could see a significant arrival of climate refugees, both domestic and foreign, following natural disasters and as international cities become uninhabitable in the summer, these new residents not accounted for in population estimates. An increase in landslides could cut parts of the city off from one another, a challenge especially concerning to Highwood where there are few ways to get in and out of the neighborhood. Drought and freight disruptions could limit the region’s access to food at times. Climate scientists have documented these scenarios as very real possibilities in the future, and the plan should account for how Saint Paul will address them. The City Council passed Resolution 18-1361 outlining the dangers of climate change and solutions that the City can take use to address this threat. The plan should provide supporting language to begin implementing significant solutions as soon as possible.	N	A separate plan, the "Climate Action and Resilience Plan," is being prepared by the Chief Resiliency Officer in the Mayor's Office.	None		
15	Saint Paul Parks and Recreation Commission	General	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:	N	Thanks!	None		
16	Saint Paul Parks and Recreation Commission	General	We must acquire correct general policy in plan that can move more specific ideas forward.	N	Comment acknowledged	None		
17	Saint Paul Parks and Recreation Commission	General	How do we remained focused on items in Comprehensive Plan to ensure equity for all?	N	Staff, the Planning Commission and City Council share this concern, and are all committed to better understanding how to measure success in achieving the City's equity goals.	None		
18	Saint Paul Parks and Recreation Commission	General	What portions of plan can commission push forward?	N		None		
19	Saint Paul Parks and Recreation Commission	General	Discussions should be included in strategic plan	N		None		
20	Saint Paul Parks and Recreation Commission	General	Are values reflected in plan?	N		None		

21	Saint Paul Parks and Recreation Commission	General	How does plan engage in climate change?	N	Several of the plans policies support density; transit; preservation of parks, open space and tree canopy; energy-efficient housing; and innovative stormwater management - all of which will lessen the impact of physical development on the climate. A separate plan, the Climate Action and Resilience Plan, is being prepared by the Chief Resiliency Officer in the Mayor's Office.	None		
22	SS	General	There are many things to like in the draft plan, but one glaring absence is a focus on supporting education. Jobs and economic vitality, parks and open spaces, equity, transportation--all these important topics are considered, but not education. This plan should include stated support for education and educational institutions: SPPS, K-12 public charters, K-12 private schools as well as early childhood and higher education. The Land Use section should specifically call out educational uses, and encourage and support quality educational facilities within our city. Good schools are an attraction to families, an investment in the future, and a tool to help achieve many of the goals of the plan: equity, high quality of life for all St Paulites.	N	We agree that schools and educational facilities are critical to a vibrant city, but the City does not control the siting, type or size of educational institutions. LU-37 and LU-38 generally support locating schools along transit routes and bicycle and pedestrian networks. LU-36 supports partnering with educational institutions for joint use of recreational fields, playgrounds and other community facilities.	None		
23	Kathleen Kelso	General	Our recommendations address the essential question we all must answer if we want to continue to live in Saint Paul: Where and how will we live as we age?	N	Aging in community is an integral value embedded throughout the Plan.	None		
24	Kathleen Kelso	General	In a Saint Paul - Ramsey County Healthy Aging report, it is noted: According to the Minnesota State Demographic Center, by 2030 Ramsey County's population 65 years and older will nearly double from 2015 numbers, while the younger population will decrease. This demographic shift means fewer people in the workforce, increased need for health and social services (e.g. in-home care, case management), increased demand for affordable and accessible housing and transit, walkable community environments, and leisure and educational services – all of which come at a significant cost to local governments, educational agencies and nonprofit organizations.	N	Comment acknowledged	None		
25	Kathleen Kelso	General	This demographic shift and consequent increase in demand for services compels local government to facilitate community-based planning and services that will promote health and vital aging and maximize contributions of our older population while minimizing expenditures (Smith, Tingle, Twiss, 2010).	N	Comment acknowledged	None		
26	Kathleen Kelso	General	It is readily apparent that we don't have decades to address solutions for the aging demographic which has already arrived.	N	Comment acknowledged	None		

27	Kathleen Kelso	General	We are encouraged by public discussion that shifts our focus from dwelling places for old people (where we are more likely to age alone and in isolation) to communities where relationships continue to create social and community supports - necessary for people of all ages to remain and thrive in our communities.	N	Aging in community is an integral value embedded throughout the Plan.	None		
28	Kathleen Kelso	General	Again, ACOA members are grateful for the clarity and support given to the Focus Areas in the Draft Comprehensive Plan, aging in community and community health, woven throughout the Plan. We believe the implemented Comprehensive Plan will create a city where people of all ages can grow up and grow old. This Plan demonstrates that Saint Paul is ready to “reframe aging,” positioning this demographic as the economic investment it is and will be. We are confident the implemented Comprehensive Plan will become regionally and nationally recognized for its intentional work and results in creating an intergenerational city that embraces aging in community.	N	Thanks!	None		
29	Kathleen Kelso	General	The ACOA is a volunteer body appointed by the Mayor and City Council to promote the dignity and independence of older residents. Members of ACOA believe that the city of Saint Paul must respond wisely to our aging demographic and the myriad challenges it presents.	N		None		
30	Michael Todd Stoick	General	The comprehensive plan should include zero-waste education and the promotion of zero-waste schools. Zero-waste doesn't mean that there is absolutely zero trash it just means that we don't waste any opportunity to reduce, reuse, recycle, and compost. We absolutely need a sustainable compost program to compliment the blue bag compost system that the city plans to roll out. A sustainable option for people to drop off compostable organics at neighborhood drop off sites including schools and churches that are part of the organics drop off network so everyone could walk to a drop off location. Recycling is something that we can do that is good, but zero-waste recycling is even better. Zero-waste Recycling should be part of our community education, school curriculum, and way of life. Instead of just looking for hope for a brighter future we all need to look for ways we can act, because when we act hope is everywhere and in everything we do.	N	This is valuable input into the City's "Climate Action and Resilience Plan," currently being prepared by the Chief Resiliency Officer in the Mayor's Office.	None		
31	Eric Osekowsky	General	I'm composing this comment to share my support for the 2040 plan. I have no particular items I want to call out. Instead, I simply want to voice my desire that St. Paul continues to grow and change to fit its residents as cities must. I do not agree with those residents who seem to have our wonderful city confused with a suburb of Minneapolis and reflexively resist change, as exemplified by the fight over the Ford plant redevelopment.	N	The 2040 Comprehensive Plan very clearly supports responsible growth.	None		
32	Nancy O'Brien Wagner	General	All maps should clearly show which spaces are parklands and cemeteries. It is misleading to not differentiate these spaces when outlining things like “poverty rates” or “households with out cars.”	Y	Maps IN-1 through IN-11 should show parks and open space areas on the base.	Add parks and open spaces to Maps IN-1 through IN-11.	15-27	Agree

33	Nancy O'Brien Wagner	General	Since the bulk of St. Paul’s infrastructure and neighborhoods were established by 1950, it would be useful to have a graph showing population per decade from 1950-2018, with estimated growth for next thirty years. Also – show decreasing household size numbers. We still have a lower population than we did then – if more people understood that, plus the lower household sizes, public conversations about density and growth (or re-population) would be better.	Y	We agree that this is useful information.	Add charts on population and household size to Appendix A in Introduction chapter.	14	Agree
34	Nancy O'Brien Wagner	General	Missing: where increasing solar power and green building technologies in city-owned buildings?	N	This should be addressed in the City's "Climate Action and Resilience Plan," currently being prepared by the Chief Resiliency Officer in the Mayor's Office.	None		
35	Nancy O'Brien Wagner	General	Where the promotion of solar power?	N	LU-16 promotes access to sunlight for solar energy systems. More detailed policies and strategies regarding solar power should be addressed in the City's "Climate Action and Resilience Plan," currently being prepared by the Chief Resiliency Officer in the Mayor's Office.	None		
36	Elisabeth Wurtmann	General	A plan that emphasizes affordable, dense housing is important to me because it will help reduce racial segregation, help low-wage workers live closer to higher-wage urban jobs, benefit the city economically by supporting population growth and property tax-base growth, and allow our city to address climate change.	N	Comment acknowledged	None		

37	Elena Gaarder	General	<p>Given there is no formal Economic Development Section, the following comments relate/could be included in both Major Trends Informing Policy and Challenges/Opportunities: Across the country, an unprecedented number of business owners are on the road to retirement, with nearly 80% not having a succession plan. Nationally, there are 2.35 million business owners at/nearing retirement age. This impacts 24 million jobs and will potentially reduce the municipal tax revenue that is generated through their \$5 trillion in combined sales. The trend has significant implications for business/job retention and growth. In St. Paul, 3,953 of the 10,600 privately owned businesses are at-risk (as defined as having business licenses over 15 years old.) This represents 98,600 jobs. The majority of these businesses are concentrated in the Downtown area. Fortunately, there is a way forward. Business conversions to employee ownership is being used around the country (and locally) as an economic development strategy that is good for business, good for workers and good for communities. For employee-owners, it has been demonstrated that household net worth is 92% higher, median job tenure is 53% longer and median income from wages is 33% higher. The changing face of business ownership and the resulting transfer of wealth presents a unique opportunity for St. Paul. Using this approach allows stakeholders in the city to prevent the erosion of the business sector and job base. It also provides a profitable exit strategy for current owners and new options for equity-driven economic and workforce development.</p>	N	<p>This is valuable information for an updated PED or city-wide Economic Development Strategy or Economic Development Action Plan. City staff will review all of the comments regarding economic development and may recommend creating a separate Economic Development chapter subsequent to adoption of the current 2040 Plan.</p>	None		
38	Kate O'Connell	General	<p>Thank you for all of the excellent work that has gone into this plan. I strongly support the goal of addressing disparities in various ways to help address some effects of historically biased policies. Such goals and policies benefit not only the direct participants but the City as a whole. When each person has a reasonable chance to bring their best to the community, the city as a whole benefits.</p>	N	<p>We agree!</p>	None		
39	Rick Varco	General	<p>St. Paul should follow the lead of Minneapolis and use the St. Paul 2040 plan to set the stage for a broad comprehensive upzoning of the entire city. This is the easiest way for the city to reduce the cost of housing for all residents, mitigate the danger of climate change, ease racial segregation, expand our tax base, and provide opportunities for high-quality jobs. While the initial draft has many strong hints in this direction, I believe many policy suggestions need to be clarified and made more firm.</p>	N	<p>The 2040 Plan supports increasing density and land use diversity at Neighborhood Nodes and Opportunity Sites, along major transit corridors, with allowances for minor increases in density in the Urban Neighborhoods. In order for the City to pursue city-wide upzoning, much more research, study and community engagement are necessary to understand the impacts of such an action and the community's appetite for it.</p>	None		

40	Tyler Blockmon	General	Legalizing the option of dense multi-family housing throughout the city allows us to address the danger of global climate change, help reduce racial segregation, and promote good construction jobs in the city.	N	The 2040 Plan supports increasing density and land use diversity at Neighborhood Nodes and Opportunity Sites, along major transit corridors, with allowances for minor increases in density in the Urban Neighborhoods. In order for the City to pursue city-wide upzoning, much more research, study and community engagement are necessary to understand the impacts of such an action and the community's appetite for it.	None		
41	David Sullivan-Nightengale	General	No mention was made about our aging pipeline systems that need to be replaced. Some of these transport hazardous materials past our homes and businesses.	N	There is general support for replacing aging infrastructure.	None		
42	David Sullivan-Nightengale	General	Our above ground electrical utilities continue to be one of the most significant resiliency vulnerabilities from inclement weather causing blackouts lasting days. There is no plan to improve the robustness of our electrical infrastructure to keep it reliable and safe. As a result, St. Paul residents have been without power for several days each year.	N	Comment acknowledged. This can be addressed in the "Climate Adaptation and Resilience Plan" currently being prepared by the Mayor's Office.	None		
43	David Sullivan-Nightengale	General	We need to make St. Paul a destination location not just for residents but the world. Multi-language signage is not just for English language learners. We want to attract the tourists and international visitors.	N	Agree, but this is too specific for a city-wide comprehensive plan.	None		
44	David Sullivan-Nightengale	General	Please show us a map where new small businesses are popping up on a map and turnover rates for businesses and housing. The Hill business library should have data we can use on this.	N	This would be interesting to include in a city-wide Economic Development Strategy or Economic Development Action Plan.	None		
45	David Sullivan-Nightengale	General	Please show us where startup can relocate or where space for small businesses may be available in the future so we can plan on siting.	N	This is too specific for a city-wide Comprehensive Plan.	None		
46	Coalition of Asian American Leaders	General	We offer these recommendations to help St. Paul be more effective in reaching and including Asian American residents: Improve and disaggregate data and when data is not available commit to collecting qualitative data. Being able to see and use this richer data will help ensure proposals are more responsive and resources are equitably invested in each of our communities. This is particularly important for programs related to small business development and workforce development.	N	Comment acknowledged	None		
47	Coalition of Asian American Leaders	General	Small business development. Support the development and growth of small businesses by creating outreach programs to educate Asian business owners about city financing and technical assistance programs. In particular food and agriculture creative sector businesses should be encouraged and resourced to succeed. Along with access to capital, access to resources such as commercial kitchens and urban agriculture programs are huge barriers for Asian entrepreneurs.	N	This is more appropriately addressed in a city-wide Economic Development Strategy or Economic Development Action Plan. Is generally supported by Policy LU-6.	None		

48	Chelsea DeArmond	General	My main concerns for 2040 are how can St. Paul communities reduce our carbon footprint and increase our resilience as our climate destabilizes?	N	A separate plan, the "Climate Action and Resilience Plan," is being prepared by the Chief Resilience Officer in the Mayor's Office.	None		
49	Luke Hanson	General	A more population-dense St. Paul will be more environmentally sustainable, and more economically resilient to the effects of climate change.	N	We agree! This is one of the Plan's core principles.	None		
50	Luke Hanson	General	A St. Paul with more affordable housing options throughout the city will be less racially and socioeconomically segregated.	N	We agree! This is one of the Plan's core principles.	None		
51	Luke Hanson	General	Universal values like affordability of housing and access to jobs should always trump subjective, personal values like a “sense of community.”	N	Comment acknowledged	None		
52	Al Davison	General	I mostly support the current proposal for the city's 2040 comprehensive plan. The city is growing and the city needs to prepare and address the issues that current and future residents will face in our community for years to come. The current plan makes a lot of great steps forward, though yet some of the policy plans seem too restrictive.	N	Comment acknowledged	None		
53	Al Davison	General	The city’s government has a large responsibility in shaping the city’s future, so I hope the 2040 Comprehensive Plan can be used as a valuable tool as we become a larger and stronger community.	N	That is the intention.	None		
54	Zack Mensinger	General	Lastly, much of the language in the 2040 could be clarified or strengthened. For instance, there are many places where things are to be "encouraged" and "supported": this language should be strengthened in order to actually enact these policies.	N	In many cases, words like "encourage" or "support" are used because the City does not have the authority to implement the policy on its own. Where the City does have authority, we have used the strongest and most direct language possible.	None		
55	Friends of the Park and Trails	General	We thank you for this opportunity to comment and congratulate city staff on the extensive community engagement and outreach they have undertaken throughout this process. As an organization made up of community members, we recognize the importance of actively engaging with our fellow citizens. We encourage this philosophy of citizen engagement as the city refers to the Comprehensive Plan to 2040 and beyond. As it was done in the creation of the document, we hope, too, it will continue in the implementation, calling for robust stakeholder involvement and identifying the importance of social capital while upholding the Core Values throughout all the Focus Areas and Topic Chapters.	N	On-going community engagement will occur throughout implementation.	None		

56	Center for Economic Inclusion	General	The Center for Economic Inclusion (the Center) appreciates the opportunity to comment on the draft City of Saint Paul 2040 Comprehensive Plan, Saint Paul for All. As an organization dedicated exclusively to advancing inclusive growth to achieve regional prosperity, the Center has urged all cities in the metropolitan area to advance a racially equitable economy through their comprehensive plans. To maximize impact, the Center is submitting specific comments on the draft plans of the five metro area cities with the highest shares of people of color.	N	Comment acknowledged. The City of Saint Paul supports racially-equitable economic development.	None		
57	Center for Economic Inclusion	General	The Center advocates that all municipalities incorporate the following elements into their comprehensive plans: 1. A goal to develop a racially equitable economy; 2. Data analysis, consistently disaggregated by race, to identify racial disparities in access to affordable housing, transit, living wage jobs and economic development; 3. Policies and strategies specifically designed to close the identified racial disparities; 4. A commitment to evaluating the impact of these policies and strategies on people of color, and to adapting those policies and strategies based on that evaluation.	Y	Equitable economic development is a core City value. The City's current efforts around community wealth-building are, at their heart, geared towards equitable economic development. The City will work on metrics to monitor the impact of the Comprehensive Plan's policies on people of color, so that our success at meeting our equity goals can be better assessed.	Add a short-term item to Implementation: <u>Prepare a comprehensive, city-wide economic development strategy, with a focus on racial equity. It should include local-scaled topics, such as Neighborhood Nodes, as well as regional issues, such as transit and workforce development.</u>	Add a short-term item to Implementation: <u>Prepare a comprehensive, city-wide economic development strategy, with a focus on racial equity. It should include local-scaled topics, such as Neighborhood Nodes, as well as regional issues, such as transit and workforce development.</u>	This may or may not be a chapter of the Comprehensive Plan.
58	Center for Economic Inclusion	General	We believe that we build inclusive economies by working at the intersection of human capital, economic development, transit and access, through the lens' of race, place and income, not by addressing them as independent focus areas.	N	Comment acknowledged	None		
59	Center for Economic Inclusion	General	And, a plan is only as successful as the sustained, intentional investment of human, intellectual, social, and financial capital that is invested in letter and spirit. To that end, the Center stands ready to partner with policy makers to incorporate these elements into draft comprehensive plans and, more generally, into the way public agencies do business.	N	We appreciate the offer to partner and will take you up on it.	None		
60	Center for Economic Inclusion	General	Re: Goal - Saint Paul for All includes "equity" in three of its foundational statements: 1. As one of the eight "challenges and opportunities for the future." Specifically, the plan states "how we grow, develop and invest over the next 20 years must be done in a way that reduces disparities in jobs, income, housing cost burden, education and home ownership." 2. "Livability, equity and sustainability" was one of nine themes identified through the community engagement process. 3. "Equity and Opportunity" is one of ten core values that inform the vision. "We are a city where opportunities in education, employment, housing, health and safety are equitably distributed and not determined by race, gender identify, sexual orientation or age; we are a city that creates opportunities for all residents to achieve their highest potential."	N	Comment acknowledged	None		

61	Center for Economic Inclusion	General	Re: Goal - It is significant that the City of Saint Paul has recognized equity as a challenge and opportunity, a theme, and a core value in the draft plan. The Center encourages the comprehensive plan to go further by including a specific goal for creating a more racially equitable economy. It is important to have a goal because it helps to focus policies, drive implementation and structure accountability through evaluation.	Y	A goal for a racially- equitable economy is better suited to an economic development strategy.	Add a short-term item to Implementation: <u>Prepare a comprehensive, city-wide economic development strategy, with a focus on racial equity. It should include local-scaled topics, such as Neighborhood Nodes, as well as regional issues, such as transit and workforce development.</u>		Agree
62	Center for Economic Inclusion	General	Re: data - Saint Paul for All contains some disaggregation of data by race, especially in the housing chapter. Also, the mapping of the “Area of Concentrated Poverty with 50% or More of People of Color” (ACP50) in relation to other data visually demonstrates how race, income, and geography coincide with poverty, homeownership, and education.	N	Comment acknowledged	None		
63	Center for Economic Inclusion	General	Re: data - Our data shows that disaggregated data is required to ensure intentional goal setting, equitable investment and measurable progress, and every effort should be taken to maintain constant awareness of the data that is readily available.	N	Comment acknowledged	None		
64	Center for Economic Inclusion	General	Re: policies - Saint Paul for All contains many policies that seek to advance racial equity and economic inclusion. The Center encourages the City to build upon this approach by: <ul style="list-style-type: none">• Applying equity analyses and policies more evenly and systematically throughout the plan.• Providing more specificity on how racial equity applies to certain policy areas.• Connecting equity-related policies to goals, actions, resources and measures.	N	Comment acknowledged.	None		
65	Center for Economic Inclusion	General	Re: Evaluation - Saint Paul for All includes several specific policies that include the use of an equity lens. The Center encourages the City to broaden the application of an equity lens to the implementation and evaluation of all city programs and decisions.	N	The equity mission of the City of Saint Paul is to integrate equity and inclusion into how we approach all of our work. The Mayor has appointed a Chief Equity Officer to provide support and guidance for integrating equity into the City's services, engagement, policies and practices. The City has four equity goals: 1) equity in our workforce; 2) equity in supplier diversity and contracting; 3) equity in the design of our services and programs; and 4) equity in our community engagement efforts.	None		

66	Center for Economic Inclusion	General	Re: data - The Center supports this disaggregation of data by race, and the geographic analysis based on ACP50s. By overlaying the ACP50 map on all the data in Appendix A, one can clearly see how race, income and geography coincide with poverty, homeownership, and education. This visualization is effective in demonstrating the relationships between these factors.	N	Comment acknowledged	None		
67	Center for Economic Inclusion	General	Re: data - However, as a planning and investment tool, ACP50s have their limitations. Originally conceived by the Metropolitan Council for region-level analysis, ACPs and ACP50s can mask a great deal of nuance when applied to the neighborhood and city levels. For one, ACP50s take attention away from disadvantaged residents in other parts of the city. Also, ACP50s are not monolithic and contain high-wealth communities and individuals within them. Finally, because the ACP50 covers a large portion of Saint Paul, it is not especially helpful in focusing resources.	N	We acknowledge that the ACP50 areas are not a perfect indicator to track every aspect of equity and inclusion. However, it is the best we have at this time. Staff will continue to refine metrics for tracking our success at reaching our equity goals.	None		
68	Center for Economic Inclusion	General	Saint Paul for All weaves the theme of social and racial equity throughout much of the plan. The Center encourages the City to strengthen this approach by: <ul style="list-style-type: none"> • Applying equity analyses and policies more evenly and systematically throughout the plan. • Providing more specificity on how racial equity applies to certain policy areas. • Connecting equity-related policies to goals, actions, resources and measures. 	N	Comment acknowledged.	None		
69	Tom Dimond	General	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.	N	We worked hard to listen to as many voices as we could, meeting people in their neighborhood, on their block.	None		
70	Tom Dimond	General	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.	N	Comment acknowledged	None		
71	Tom Dimond	General	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.	N	Comment acknowledged	None		
72	Tom Dimond	General	All deserve safe, healthy and attractive neighborhoods that enhance our quality of life.	N	We agree!	None		
73	Tom Dimond	General	Neighborhood reinvestment should be a top priority of the City. Vacant and foreclosed properties can be very detrimental to neighborhood livability and vitality.	N	Comment acknowledged	None		

74	Tom Dimond	General	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.	N	Not sure what the commenter means. The Comp Plan supports considerable new development on the West Side Flats and supports continued investment in the industrial uses along Warner Road and Highway 61.	None		
75	Tom Dimond	General	Our Comprehensive Plan should enhance the livability of all neighborhoods and the wildlife who share this planet.	N	Comment acknowledged	None		
76	Saint Anthony Park Community Council (SAP)	General	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.	N	Comment acknowledged	None		
77	Saint Anthony Park Community Council (SAP)	General	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.	N	Comment acknowledged	None		
78	Saint Anthony Park Community Council (SAP)	General	Many policies would provide more direction if they contained more specific ideas and commitments.	N	Comment acknowledged	None		
79	Saint Anthony Park Community Council (SAP)	General	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.	N	The "Climate Adaptation and Resilience Plan" is currently being prepared by the City's Chief Resilience Officer in the Mayor's Office. These comments will be forwarded to him.	None		

80	Saint Anthony Park Community Council (SAP)	General	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.	N	The 2040 Comprehensive Plan is a high-level policy document. Some of these priorities are foundational to the land use and development policy in the draft Plan, such as environmental quality, healthful living and healthy ecological systems. More detail can be provided in the "Climate Adaptation and Resilience Plan" currently being prepared by the City's Chief Resilience Officer.	None		
81	Saint Anthony Park Community Council (SAP)	General	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.	N	Comment acknowledged	None		
82	Saint Anthony Park Community Council (SAP)	General	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.	N	Thanks. We look forward to working with you.	None		
83	Dan Marshall and Millie Adelsheim	General	With these changes, we believe that Saint Paul can grow responsibly, become more environmentally sustainable, and support local businesses without sacrificing the city's historic charm or unique neighborhoods. Thank you, Dan Marshall and Millie Adelsheim	N	Thanks! We do, too.	None		
84	Karen Allen	General	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.	N	Comment acknowledged	None		
85	Karen Allen	General	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 Paul's future together.	N	Comment acknowledged	None		

86	Creative Enterprise Zone	General	<p>The Creative Enterprise Zone (CEZ), formally recognized by the City’s Planning Commission in April 2013 as a special business development district serves to highlight the naturally occurring and intentional relationship between people, place, built environment, and economic development. The vibrant ecosystem of industry and entrepreneurial startups produces a creative economy within the CEZ boundaries that provides essential economic power for the city of Saint Paul and adjacent cities. The Creative Enterprise Zone is the second largest employment center for the city, and the number one source of tax base, both crucial metrics. (See attached info graphic). The board of the Creative Enterprise Zone organization supports many of the elements in the 2040 Comp Plan and also supports comments offered by the SAPCC and Towerside organizations.</p>	N	Comment acknowledged	None		
87	Creative Enterprise Zone	General	<p>We urge increased requirements for district systems that conserve our resources (water, energy) and renovate and build to highest and flexible uses including solar and other renewable energies, district systems, and building with an eye toward adaptability.</p>	N	<p>Policies LU-7, LU-8, LU-16, LU-18, LU-20, WR-2, WR-4, WR-5, WR-6, WR-7 lay the policy groundwork for district systems, renewable energy systems and climate adaptability. The City is in the process of preparing a separate Climate Adaptation and Resilience Plan, which will recommend more specific strategies to achieve the goals and policies laid out in the Comp Plan.</p>	None		
88	Creative Enterprise Zone	General	<p>Indeed, we want to work together to immediately apply what we already know. Market demand for standard development projects is rapidly growing, and the vast majority of these projects do not help move the needle on the City of Saint Paul’s core values of resilience, climate protection, and equity.</p>	N	Comment acknowledged	None		

89	Tom Darling	General	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	N	Comment acknowledged. The City's Heritage Preservation Commission is responsible for preserving Summit Avenue through administration of the City's preservation ordinance. Creating a new district council to cover all of Summit Avenue is beyond the scope of the Comprehensive Plan.	None		
90	Towerside Innovation District	General	These important strategies for job creation and job density along major public transit promotes the City of Saint Paul’s and Towerside’s core values of resilience, climate protection, and equity.	N	Comment acknowledged	None		
91	Towerside Innovation District	General	I and Towerside’s 35+ partners will continue to engage with you, council members, city staff and others to fully realize the tremendous social and economic impact possible via the collective and collaborative Towerside Innovation District vision. I am proud to be part of an effort that will have an inestimable impact not only broadly economically, but on the lives and futures of so many families and individuals in our community who are now faced with inequity on so many fronts. Thank you again for your ongoing support of our work.	N	We look forward to continuing to work with you on the Towerside Innovation District vision.	None		
92	Jessa Anderson-Reitz	General	A more population-dense St. Paul will be more environmentally sustainable, and more economically resilient to the effects of climate change.	N	We agree!	None		
93	Jessa Anderson-Reitz	General	In order to realize this vision, the St. Paul 2040 Comp Plan needs sharper teeth.	N	Comment acknowledged	None		
94	Jessa Anderson-Reitz	General	Universal values like affordability of housing and access to jobs should always take precedence over subjective, personal values like a “sense of community.”	N	Comment acknowledged	None		
95	Kody Sherlund	General	I'd like to stress the importance of a few items in this plan that will make Saint Paul a better place for more people to live in the future and remain competitive as an urban hub.	N	Comment acknowledged	None		
96	Barry Reisch	General	It would be nice if our vision for the future would involve ways to reduce spending, consumption of resources, lessening our carbon footprint, etc.	N	We believe it does.	None		
97	Scott Berger	General	We need an aggressive plan to combat the long-held conventional wisdom that is causing the city to fail to realize its full potential.	N	Comment acknowledged	None		

98	Cory Zwiefelhofer	General	I am glad that Saint Paul is looking far into the future and is doing a great job with this plan. However, I do not feel that it goes far enough in eliminating inequities in our society, combating climate change, or allowing for safe travel for all. Some areas which I feel this plan is lacking include:	N	Comment acknowledged	None		
99	Nicholas Rossini	General	Clean, renewable energy should be implemented throughout the whole city by 2040. Thanks for looking at my concerns	N	We agree. A separate plan, the Climate Action and Resilience Plan, is being prepared by the Chief Resiliency Officer in the Mayor's Office.	None		
100	KL	General	2) climate resiliency: the city needs to implement aggressive plans to prepare the city for the impacts of climate change and should involve the district councils in advancing resilience plans and also getting members of their communities educated on why we need to act and what they can do	N	We agree. A separate plan, the "Climate Action and Resilience Plan," is being prepared by the Chief Resiliency Officer in the Mayor's Office.	None		
101	Kathryn Noble	General	Other suggestions are to consider the possibility of alleyway and sidewalk snow removal, idling vehicle bans in residential areas, traffic calming measures in urban arteries (Larpenteur, Energy Park, Rice being chief culprits), prioritizing multimodal transportation (including bikeshare which is very disappointing at the moment), organic recycling collected at the alleyway, and more mixed use developments at key areas.	N	Multi-modal transportation and higher-density, mixed-use development are foundational to the 2040 Comprehensive Plan. The other, more specific recommendations can be addressed in the "Climate Adaptation and Resilience Plan."	None		
102	Kathryn Noble	General	St. Paul needs to do a lot more than the 2040 plan if it wants to live up to its name of "the most livable city in America."	N	Comment acknowledged	None		
103	Kai Peterson	General	St. Paul's draft 2040 Comprehensive Plan is a good start, but it could be improved.	N	Comment acknowledged	None		
104	Keith Koch	General	While I applaud the city's leadership in looking forward how to meet the needs of our growing community/economy and trying to structure a path-forward to achieve desirable outcomes, I worry that current voices creating plans are lacking a balanced view of what characteristics of St. Paul have made it a successful and desirable city to-date.	N	Comment acknowledged	None		
105	Keith Koch	General	Please understand that radical changes will lead to radical outcomes, and that a more gradual moderate change will allow the city to make adjustments as the (positive and negative) impacts are better understood to manage the evolution of changes we want to see in the city (and therefore mitigate the changes we all find unfavorable).	N	Comment acknowledged	None		
106	Tom Basgen	General	This plan should be far more aggressive in its Justice and Climate Goals.	N	A separate plan, the Climate Action and Resilience Plan, is being prepared by the Chief Resiliency Officer in the Mayor's Office.	None		
107	Tom Basgen	General	We need to be spending our money on things that actually return on investment. Specifically not cars, specifically not cops.	N	The 2040 Comprehensive Plan prioritizes pedestrians, bikes and transit over cars.	None		
108	Jake Reilly	General	I would like to address five points today. I'll even try to be brief. They are: praise, jobs/labor force, affordable housing, accountability, and a hot tip.	N		None		

109	Jake Reilly	General	1. I am so proud to have been a part of this team that intentionally went out and listened to people in their neighborhoods, workplaces, and where they recreated. I am proud to see those folks’ ideas reflected in this plan. And I am grateful to have a plan that not only has a neat user’s guide companion but also is consumable by those who live, work, and play here in Saint Paul. Thank you for your hard work.	N	Thank you!	None		
110	Jake Reilly	General	4. Finally, we promised those we spoke to that we would hold ourselves accountable to the people we talked to. That we would provide a document that had policies that were legible, defensible, and meaningful. And that we would stand by them. I think you’ve done that from a document standpoint. That needs must also be done from an institutional accountability standpoint. So, in closing, I urge you to remember why we plan for a 20-year horizon. In reality we do it for our children and our children’s children. The way we planned for, used, and developed land 50 years ago impacts us today. And impacts some communities more than others. Leaving us with not only costly wounds to our communities, but also costly projects to physically reconnect those communities. That will hold true in the next 20 years and 40 years and 80 years. So, let’s get this right. Let’s be both accountable to those we spoke to and the neighbors to whom we have an obligation to today, but also to our children, their children, your children, and those who are yet to come.	N	Comment acknowledged	None		
111	Stuart and Mary Ellen Knappermiller	General	Russ' Resiliency work has to be here. We face our greatest emergency ever, not for me because I will be dead, but certainly for our granddaughters, in climate change. How I will heat my home in a decade or less. I can't buy a more efficient furnace than we have. What's our plan? We use 4 ceiling fans when we are in a room that needs cooling. We've spent months in SE Asia and South America so we know we can live with our central air off all summer. We have solar on our roof for electricity.	N	A separate plan, the Climate Action and Resilience Plan, is being prepared by the Chief Resiliency Officer in the Mayor's Office.	None		
112	Stuart and Mary Ellen Knappermiller	General	We need to put the same amount of money into SPPS that was there in the 80's and 90's when Melvin and our children were in our schools.	N	Comment acknowledged	None		
113	Stuart and Mary Ellen Knappermiller	General	We need to tap into our elders - 2,000 live in the PPCC area -to help children walk SRTS, tutor in schools, volunteer in our rec centers, for our police and firefighters.	N	Yes. Our aging residents are an incredible resource.	None		
114	Stuart and Mary Ellen Knappermiller	General	We must find a way to convince the "taxpayers" that they are citizens. That this city is our city.	N	Comment acknowledged	None		
115	Stuart and Mary Ellen Knappermiller	General	Listen to the young people, not those of us who are dying out. But don't let the ignorance from social media guide our city. Keep meeting with citizens and reaching out to us, until we understand we're all in this together.	N	The City has an on-going commitment to community engagement.	None		
116	Michael Sonn	General	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.	N	More clarity on how we the Plan should be more ambitious would have helped.	None		

117	Michael Sonn	General	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.	N	Comment acknowledged	None		
118	Andrew Singer	General	Then you don't define "equity". Do you mean "equity between modes" (bike, pedestrian, transit, car)? ...or do you mean racial equity as in "we have to prioritize this project because it's in a largely Hmong or African American neighborhood"? This is important because, as written, "Safety and equity" are more important than "maintenance" or the age of a given piece of infrastructure.	Y	We mean racial and social equity.	Amend T-1 to read: Prioritize safety and racial and social equity benefits in project selection, followed by support....		Agree
119	Payne-Phalen Community Council	General	Dear Commissioners: On behalf of the Payne-Payne 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.	N	Thanks.	None		

120	Payne-Phalen Community Council	General	<p>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 of write if further clarification is needed on any point.</p>	N	Comment acknowledged.	None		
121	Payne-Phalen Community Council	General	<p>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.</p>	N	Comment acknowledged.	None		
122	Payne-Phalen Community Council	General	<p>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:</p>	N	Comment acknowledged	None		
123	Payne-Phalen Community Council	General	<p>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.</p>	N	Comment acknowledged. Resiliency is a core value.	None		

124	Payne-Phalen Community Council	General	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.	N	Comment acknowledged	None		
125	Payne-Phalen Community Council	General	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.	N	The fact sheets were prepared as part of a Reader's Guide; we agree that they are very helpful in creating the policies to the focus areas. The fact sheets will be updated once the Plan is adopted, but will not be incorporated into the text of the document.	None		
126	Payne-Phalen Community Council	General	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.	N	Comment acknowledged. We have a professional editor on-board who will review the final document.	None		
127	Payne-Phalen Community Council	General	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!	Y	There will be one in the next draft.	Add Acknowledgments page.		Agree

128	Payne-Phalen Community Council	General	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!	N	Comment acknowledged	None		
129	Payne-Phalen Community Council	General	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.	N	Thanks!	None		
130	Payne-Phalen Community Council	General	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 in ensured, not just aspired to.	N	Comment acknowledged	None		
131	Payne-Phalen Community Council	General	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.	N	Comment acknowledged	None		
132	Payne-Phalen Community Council	General	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.	N	Comment acknowledged	None		

133	Payne-Phalen Community Council	General	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.	N	Comment acknowledged	None		
134	Payne-Phalen Community Council	General	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.	N	City staff will review all of the comments regarding economic development and may recommend creating a separate Economic Development chapter subsequent to adoption of the current 2040 Plan.	None		
135	Payne-Phalen Community Council	General	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.	N	Agree. The Land Use, Transportation and Water Resources policies in the 2040 Comprehensive Plan are intended to set the stage for this approach. A separate plan, the Climate Adaptation and Resilience Plan, is being prepared by the Chief Resilience Officer in the Mayor's Office, and will recommend specific strategies to achieve these policies.	None		

136	Payne-Phalen Community Council	General	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.	N	A separate plan, the "Climate Action and Resilience Plan," is being prepared by the Chief Resiliency Officer in the Mayor's Office.	None		
137	Payne-Phalen Community Council	General	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.	N	City staff will review all of the comments regarding economic development and may recommend creating a separate Economic Development chapter subsequent to adoption of the current 2040 Plan.	None		
138	Payne-Phalen Community Council	General	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 closed hones to the policies adopted in the comprehensive plan. Once finalized, it should be incorporated into the City’s comprehensive plan.	N	City staff will review all of the comments regarding economic development and may recommend creating a separate Economic Development chapter subsequent to adoption of the current 2040 Plan.	None		

139	Payne-Phalen Community Council	General	<p>66. In this manner, three other considerations should be kept front and center for this work:</p> <p>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.</p> <p>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.</p> <p>c. Similar additional chapters and/or follow-up plans could and should be created for the following topics:</p> <p>(i) Civic Engagement</p> <p>(ii) Arts and Culture</p> <p>(iii) Public Facilities and the provision of public services</p> <p>(iv) Energy, Environment, and Resiliency</p>	N	City staff will review all of the comments regarding economic development and may recommend creating a separate Economic Development chapter subsequent to adoption of the current 2040 Plan. The Chief Resiliency Officer in the Mayor's Office is currently working on a "Climate Adaptation and Resilience Plan."	None		
140	Carol Kist	General	Concerned about the a pond that is overflowing (near St. Catherine on Cleveland Ave.), due to a damned underground stream. In winter the overflow floods onto the sidewalk and becomes ice. There has been no intervention to address the problem.	N	Comment acknowledged	None		
141	Pat Thompson	General	Concerned about climate change and equity.	N	Comment acknowledged	None		
142	Pat Thompson	General	Minnesota is going to be a new home for climate refugees and internally displaced people from the U.S. More housing everywhere regardless of entrenched interest who want nothing to change.	N	Comment acknowledged	None		
143	Pat Thompson	General	Equity means a lot of things but a few that are applicable here are breaking down the single-family zoning cost barrier and not channeling mobile pollution into the most vulnerable neighborhoods.	N	Comment acknowledged	None		
144	Michael Russell	General	Concern about the affect of climate change on the city and future generations. Need for conservation of energy, changing the nature of transit, how far people will move, how they get their food, etc.	N	Agree.	None		
145	Michael Russell	General	The focus on equity is really important. The parks think about this, the neighborhood nodes need to think about this too.	N	Comment acknowledged	None		
146	Derek Thompson	Housing	I want a variety of housing options so I can afford to live in the city.	N	So do we.	None		
147	Sharon Garth	Housing	The plan is very well crafted. I want to emphasize the importance of putting people first in economic development programs, education and housing. The needs of low/moderate income, culturally diverse people must be met. Livable wage jobs are a good start and now there must be a focus on affordable housing and cultural diversity planning.	N	We agree. See the sidebar on p. 11, "People Infrastructure."	None		

148	Colleen Schauer	Housing	Policy H-1 calls for maintaining the housing stock through enforcement of city codes. This policy needs additional language/protections that ensures this will not have a disproportionate negative effect on people with low incomes who may not have the resources to do this.	N	DSI has done a racial equity assessment of its enforcement process to ensure enforcement is not done in a way to disproportionately impact racial or ethnic groups. Complaint information is confidential. Policy H-26 calls for creating awareness around tenant and landlord rights, responsibilities, best practices and resources to decrease conflicts that could lead to eviction.	None		
149	Jean Schroepfer	Housing	St. Paul should allow upper-lower duplexes everywhere in the city. Any owner who wants to use the property as a house would be free to do so. Allowing duplexes cuts housing costs in half at no cost to the taxpayers, creates housing opportunities with yards, acknowledges renters as equal human beings, and dramatically reduces Zoning staff's workload (allowing focus on health and safety).	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes (but not duplexes) in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	None		

150	Kory Andersen	Housing	3. Increase the size of the affordable housing trust fund by levying a tax on property owners. If you increase the density of the city and more ppl can live here, the amount won't be astronomical because we would have a larger tax base.	N	Noted. The Mayor and City Council created the Housing Trust Fund to focus on preservation and production of affordable housing and protection of people living in affordable housing. General support for the preservation of existing and production of new affordable housing is appropriately stated in H-31 and H-32. Specific budget recommendations are not appropriate for the Comprehensive Plan.	None		
151	District 1 Land Use Committee	Housing	We believe that housing is a fundamental human right and that housing policy carries tremendous moral implications.	N	Comment acknowledged	None		
152	District 1 Land Use Committee	Housing	We feel it is also important to acknowledge the role zoning plays in housing costs. It has been well-documented that overly restrictive zoning ordinances create artificial scarcity and thus drive up the value of land. This is particularly insidious because land value is a significant fixed cost in the new construction of housing. The construction of multi-family buildings with fewer units can result in exorbitantly expensive housing when land values are high. It also adds to the difficulty of efficiently funding the construction of new affordable housing. The policies contained in this plan can help ease escalating land values if corresponding zoning amendments are made that realize those policies.	N	Comment acknowledged	None		
153	District 1 Land Use Committee	Housing	We overall support the policies regarding housing density and the need for additional housing options. We support changes to the zoning and building codes that allow the flexibility to develop “missing middle” housing types in areas that are currently zoned single-family. The ability to accommodate the needs of different family types, stages of life, and levels of ability is important to maintaining strong neighborhoods. An expanded range of housing types, such as bungalow courts and townhouses/rowhouses, complement single-family homes in a neighborhood.	N	Comment acknowledged	None		
154	District 1 Land Use Committee	Housing	pg. 111: H-1, add language that code enforcement will be done in such a way as to not disparately impact racial or ethnic groups. Protection of tenants who trigger enforcement from retaliation will be a top priority.	N	DSI has done a racial equity assessment of its enforcement process to ensure enforcement is not done in a way to disparately impact racial or ethnic groups. Complaint information is confidential.	None		
155	District 1 Land Use Committee	Housing	pg. 112: H-16, add language to ensure that promotion of housing choice among diverse income levels will not be used to upscale units in poor neighborhoods.	N	Policy H-16 adequately addresses residential choice and support for economically diverse neighborhoods.	None		

156	District 1 Land Use Committee	Housing	H-17, does the City even need a regulatory definition of “family?” Could the zoning use of kitchen/bathroom/bedroom comprising a dwelling unit be used in its place?	N	The definition of family is used throughout the Zoning Code so it is needed. At the request of the City Council, PED staff are currently conducting a study to review and update the definition.	None		
157	District 1 Land Use Committee	Housing	H-19, add language about reducing racial disparities and the history of unfair housing practices similar to language used in H-20.	N	The boxed comments on page 110 go into great detail about the Analysis of Impediments and the steps to affirmatively further fair housing.	None		
158	District 1 Land Use Committee	Housing	pg. 114: H-22, add “Any promotion of housing ownership will be done with a racial justice lens and with an eye to remedy of historic housing discrimination.”	Y	A reference to racial justice will be added to the introduction of the Housing Chapter. Page 30 of the Land Use chapter discusses applying the Metropolitan Council’s Areas of Racially Concentrated Poverty to Saint Paul. Page 110 and Page 164 in Appendix A discuss affirmatively furthering fair housing.	Add a reference to racial justice to the Introduction.		Amend H-20 to read: Collaborate with partner agencies, lenders and the real estate industry to reduce racial disparities in homeownership that could be attributed to unequal access to fair lending, or intentional steering to specirfic neighborhoods <u>or</u> <u>historic housing discrimination.</u>
159	District 1 Land Use Committee	Housing	pg. 116: H-26, add an acknowledgement that the City is aware that tenant rights need additional support and will work to increase them.	Y	DSI conducts landlord training sessions. There is an existing State of Minnesota Tenant Remedies Act.	Revise Policy H-26 by replacing the word “Create” with “ <u>Increase.</u> ”		Agree

160	District 1 Land Use Committee	Housing	Add a new policy that reads "engage in fair housing testing to determine the depth of racial, gender, or cultural bias in the rental or ownership of housing."	N	As a CDBG entitlement jurisdiction, the City is a committee member and funding partner of the Fair Housing Implementation Council ("FHIC"), a metro-wide regional fair housing committee for the Twin Cities area. In past years, the FHIC awarded grant funding to Southern Minnesota Regional Legal Services and Central Minnesota Legal Services (North Minneapolis) for fair housing testing. FHIC annually allocates its funding for the upcoming year as required by the Analysis of Impediments; however, we expect that funds will be allocated this year to drafting the Analysis of Impediments to Fair Housing instead of fair housing testing activities. H-16 and H-48 call for providing additional housing choice. Page 110 and page 164 in Appendix A include discussions of affirmatively furthering fair housing. Housing implementation tools are discussed in Appendix C.	None		
161	District 1 Land Use Committee	Housing	Add a new policy that reads "encourage landlord education on topics of affordable housing options including the acceptance of Section 8 vouchers."	Y	The City Council adopted a resolution in July 2018 asking City staff to explore ordinances to reduce barriers to finding rental housing, including increasing acceptance of Housing Choice Vouchers. This work is underway.	Revise H-26 as follows: <u>Increase</u> awareness around tenant and landlord rights, responsibilities, best practices and resources to <u>increase access to rental units and</u> decrease conflicts that could lead to evictions.	Agree	
162	District 1 Land Use Committee	Housing	pg. 117: H-32, we request the policy be revised so that the City's target new rental construction affordability will be determined by our Met Council affordability goals. Given 830 units at 30% AMI, 130 units at 50% AMI and 1010 units at 60% AMI, our goals will be 25% at 30% AMI, 5% at 50% AMI and 15% at 60% AMI (100% of the 30% goal and 50% of the 50% and 60% goals).	N	The City has met the goals set by the Metropolitan Council each year and often exceeds these goals. The goals in this policy are based on a strong foundation of what is attainable with existing resources.	None		

163	District 1 Land Use Committee	Housing	H-33, we request that the policy be revised so that the City's target for new ownership will be determined by Met Council affordability goals. Given approximately 130 units at 50% AMI and 1010 units at 60% AMI, our goals will be 5% at 50% AMI and 15% at 60% AMI (half of the goals at 50% and 60%).	N	The City has met the goals set by the Metropolitan Council each year and consistently exceeds these goals. The goals in this policy based on a strong foundation of what is attainable with existing resources.	None		
164	District 1 Land Use Committee	Housing	H-41, we request that this policy be changed to read "use official controls to require affordable housing to achieve mixed-income neighborhoods."	N	The City Council has already requested that City staff explore the impacts and advantages of a city-wide and/or targeted inclusionary zoning policy, and report back to them by the end of 2019.	None		
165	District 1 Land Use Committee	Housing	H-44, achieving the Met Council Affordable Housing goals should be a top priority in planning, legislative priorities, and comprehensive plan language. This policy should be strengthened to ensure that the goals are met.	N	The City has met the goals set by the Metropolitan Council each year and consistently exceeds these goals. The goals in this policy are based on a strong foundation of what is attainable with existing resources.	None		
166	KC Cox	Housing	My biggest concern regarding the 2040 plan is the idea that a single dwelling home is not the correct goal for individuals or families. That highest density possible is the goal. The thought of a 6 story building next to my single dwelling home doesn't bode well. Multifamily dwellings should match the neighborhood - not stand out. The idea that changing neighborhoods into nothing but tall building after tall building after tall building is not a good vision.	N	Comment acknowledged	None		

167	James Slegers	Housing	<p>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.</p>	N	<p>The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.</p>	None	
-----	---------------	---------	--	---	--	------	--

168	James Slegers	Housing	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"	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and have added the elimination of parking minimums to the study.	None		
169	Jace Schroeder	Housing	I support additional housing density along and around Snelling Ave in the Midway neighborhood.	N	There are Neighborhood Nodes along Snelling at University and Maryland. These are locations where higher densities and more varied land uses will be supported.	None		

170	Frank Alarcon	Housing	As a resident of Saint Paul, I would like the comprehensive plan to abolish single-family zoning and minimum parking requirements, like the Minneapolis 2040 plan. These policies restrict the supply of housing and raise the cost of development, contributing to the region's housing crisis that disproportionately harms people of color and people with low incomes. They also exacerbate climate change by guaranteeing space for cars and reserving swaths of the city for single-family homes only. Thank you.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and have added the elimination of parking minimums to the study.	None		
171	Kathleen Kelso	Housing	We recommended that themes aging in community and healthy aging be given critical attention as we prepare for a demographic shift that will require new housing models, new transit models, and broad based connectivity.	N	We agree.	None		
172	Kathleen Kelso	Housing	This demographic shift means fewer people in the workforce, increased need for health and social services (e.g. in-home care, case management), increased demand for affordable and accessible housing and transit, walkable community environments, and leisure and educational services – all of which come at a significant cost to local governments, educational agencies and nonprofit organizations.	N	Comment acknowledged	None		
173	Kathleen Kelso	Housing	We are encouraged by public discussion that shifts our focus from dwelling places for old people (where we are more likely to age alone and in isolation) to communities where relationships continue to create social and community supports - necessary for people of all ages to remain and thrive in our communities.	N	Comment acknowledged	None		
174	Nancy O'Brien Wagner	Housing	Isn't "Decent, Safe, and Healthy" redundant? Just one of those words would do it.	N	This relates to a HUD definition. They each mean different things. Keep all three words as is.	None		

175	Nancy O'Brien Wagner	Housing	The promotion of mixed and “missing middle” housing is fine. DO NOT FOLLOW MINNEAPOLIS INTO THE “3-UNITS ALLOWED EVERYWHERE” model.	N	Comment acknowledged	None		
176	Shirley Erstad	Housing	<p>older housing may initially be more affordable, the extraordinary maintenance costs could lead to neglect and loss of the stock over time. This adds to the challenge of maintaining diverse and affordable housing options in Saint Paul.” —The use of “extraordinary” is noteworthy. What is the measurement for “extraordinary” or is it based on assumptions? —This also implies new housing won’t become old housing. —It makes broad assumptions that older homes are more expensive to maintain. That may be true in some cases, but not in all. Like anything, if routine maintenance is done, it saves money in the long run. —If a furnace goes out, is it substantially more expensive to put one in an older home versus a newer home? Perhaps, perhaps not, but if so, is it to the point that the old house should be torn down to put up new housing (again, presuming that somehow the new ones don’t age) because this is “extraordinary maintenance costs”? —Naturally occurring affordable housing (NOAH) can be purchased and sweat equity can make the home a good investment. This statement assumes no one puts in sweat equity. —The environmentally “greener” house is the one that’s already there.</p> <p>There have been a lot of articles written about this. —Older housing stock used materials that are no longer available. Old growth hardwoods cannot be widely used today, adding value to some older housing. —Older housing was built using some methods that also make them highly desirable today. I live in a house that is over 100 years old, has appreciated in value (and held steady during the downturn in the economy), and has a roof that builders today say they couldn’t begin to copy. —Labor shortages, particularly of skilled workers, mean quality building costs more money. We had some work done on our house last year and it quickly became clear some of the construction was being done incorrectly because the labor was unqualified. For these reasons, I believe the assumption in the draft statement that somehow new housing is cheaper than old housing doesn’t hold up. If that is an underlying principle of the housing chapter, this needs much more work.</p>	N	There is no measurement of “extraordinary,” just the understanding that deferred maintenance of older housing can result in more, and more expensive, repairs. To meet housing demand, we need to rely on both new and rehabilitated housing stock.	None		
177	Elisabeth Wurtmann	Housing	Saint Paul should set a 2040 comprehensive plan that supports affordable housing by increasing density. I strongly support Policy H-48 to "expand permitted housing types in Urban Neighborhoods...to include duplexes, triplexes, town homes, small-scale multifamily and accessory dwelling units."	N	Comment acknowledged	None		
178	Elisabeth Wurtmann	Housing	A plan that emphasizes affordable, dense housing is important to me because it will help reduce racial segregation, help low-wage workers live closer to higher-wage urban jobs, benefit the city economically by supporting population growth and property tax-base growth, and allow our city to address climate change.	N	Comment acknowledged	None		

179	Jason Peterson	Housing	<p>I applaud the work to date on the creation of the 2040 Comprehensive Plan for the City of St. Paul. As both a resident of St. Paul and an employee of a non-profit that works on affordable homeownership programming in St. Paul, I appreciate the effort and thoughtfulness that has gone into the plan to date. I am writing today as Executive Director of NeighborWorks Home Partners. Our organization’s homeownership programs seek to empower and strengthen a family’s wealth through obtaining and maintaining one of the largest and most important investments they can make – their home. What differentiates us from other similar organizations is our comprehensive combination of full-cycle services that we offer. We are able to meet the needs of potential and current homebuyers before, during, and after their purchase in St. Paul. NeighborWorks Home Partners has been a proud partner of the City of St. Paul for close to forty years. We have worked hand-in-hand with the City to help literally tens of thousands of families achieve and maintain their dream of homeownership. We are very excited about the recent commitment to affordable housing and look forward to continuing to partner with the City to help even more families with their dream of homeownership. We are grateful for this partnership and the following comments are not meant to detract from this great work. Rather, they are suggestions on how to strengthen the housing portion of the 2040 Comprehensive Plan. The City of St. Paul currently faces an affordable housing crisis. Mayor Carter has stated as much and the City Council acknowledged this issue with the affordable housing resolution passed in July of 2018. I applaud the recent actions taken by the City to devote additional resources to support housing in St. Paul but that is just a start.</p>	N	Comment acknowledged	None		
180	Jason Peterson	Housing	<p>There are a number of ideas included in the 2040 Comprehensive Plan to create and preserve affordable housing in St. Paul. Many of these ideas involve continuing activity already taking place. Unfortunately, the current pace of preservation and creation of affordable housing in St. Paul is lagging far behind goals and, more importantly, need. As the 2040 Comprehensive Plan is a chance to set forth bold strategies for the next 20 years, I would encourage you to go further. Perpetuating current ideas will not get St. Paul to a place in which we are meeting these goals or the demand in the community. The current plan does a good job of inventorying current activities but I would challenge you to consider what new and innovative strategies you could put forward to help close this gap. It would be beneficial to see specific tools and strategies included in the 2040 Comprehensive Plan around housing to meet proposed goals and need in the community.</p>	N	<p>The Mayor and City Council created the Housing Trust Fund to focus on the preservation of existing and production of new affordable housing, and the protection of people living in affordable housing. H-42 and H-43 call for on-going efforts to pursue funding for this purpose.</p>	None		

181	Nancy O'Brien Wagner	Housing	Finite resources are certainly one reason why a gap remains between the availability of affordable housing and the need within the community. An area which is lacking in the plan is an emphasis on leveraging partnerships within the community. The City of St. Paul as many great partner organizations are doing work around affordable housing throughout the City. It would be great to see the 2040 Comprehensive Plan include specific language around proactively partnering with the nonprofit development community to leverage their dollars for a greater impact.	N	Several policies in the plan already call for collaboration with partner agencies, including H-20 (to reduce racial disparities in homeownership), H-22 (down payment for first-time home buyers), H-35 (explore mechanisms to ensure that affordable ownership units remain affordable). The appendices specifically reference numerous strategic partnerships.	None		
182	Jason Peterson	Housing	While I am very excited for the creation of the Housing Trust Fund and the initial investment into this fund, at this time, there is no dedicated funding source to keep this fund going. I would strongly encourage you to commit to funding affordable housing via a Housing Trust Fund model by making a dedicated source of funding a goal in the 2040 Comprehensive Plan.	Y	Several policies in the plan already call for collaboration with partner agencies, including H-20 (to reduce racial disparities in homeownership), H-22 (down payment for first-time home buyers), H-35 (explore mechanisms to ensure that affordable ownership units remain affordable). The appendices specifically reference numerous strategic partnerships.	Amend H-42 to read: “Pursue public and private funding sources, <u>including local sources</u> , for affordable housing preservation and production. Amend H-43 to read: “Encourage and support state and federal legislation that preserves existing programs and provides new funding, <u>including a dedicated funding source</u> , for affordable ownership and rental housing.		Agree
183	Jason Peterson	Housing	Also, the funding sources listed in the 2040 Comprehensive Plan and the appendices are primarily current funding streams from traditional sources. As mentioned above, the current production is not meeting demand and I challenge you to consider how you will meet this demand without additional resources.	N	Comment acknowledged	None		
184	Jason Peterson	Housing	As such, I would encourage you to consider how the City of Saint Paul will increase its competitiveness for state or philanthropic resources in this plan. I strongly feel this should be tied into leveraging your partnerships in the community as many partners are willing to raise additional dollars if the City were willing to also make an investment in this work.	N	The plan and appendices include numerous references for opportunities to partner.	None		
185	Jason Peterson	Housing	Throughout the draft the housing sections of the 2040 Comprehensive Plan, the word “encouraging” can be found many times. While it is great to “encourage”, I would challenge the City to go beyond and look how to better spark action. For example, the City could encourage a landlord to keep a rental property affordable or the City could incentivize a landlord to keep a rental affordable. A City could encourage development by a nonprofit within the City or they could invest in the non-profit to leverage their dollars for development. Encouragement is great but other tools are likely more effective to get work done.	N	Comment acknowledged.	None		

186	Jason Peterson	Housing	NeighborWorks Home Partners is proud of our partnership with the City of St. Paul. We also applaud the recent emphasis on affordable housing and the commitment of financial resources to combat this challenge. We are committed to continuing our vital homeownership programs in St. Paul and stand ready to help the City of St. Paul in any way we can to meet the affordable housing needs in our community. We look forward to partnering with St. Paul to meet the goals included in the 2040 Comprehensive Plan and help St. Paul families buy, keep and fix their homes.	N	Thank you. We look forward to continuing to partner with you as well.	None		
187	Jim Roth	Housing	The 2040 Comprehensive Plan is an opportunity for the City of Saint Paul to align existing and emerging strategies and resources to guide the City's growth and development. As the Saint Paul Planning Commission considers the draft 2040 Comprehensive Plan, the Metropolitan Consortium of Community Developers (MCCD) would like to comment on the Plan's housing goals and policies. MCCD is an association of nearly 50 nonprofit community development organizations committed to expanding the wealth and resources of neighborhoods through housing and economic development initiatives.	N	Comment acknowledged	None		
188	Jim Roth	Housing	MCCD appreciates the Planning and Economic Development (PED) department's community engagement efforts for the Comprehensive Plan, as well as the City's continued attention to affordable housing and economic development. Housing affordability is crucial for the City of Saint Paul; as the Saint Paul City Council acknowledged in its July 2018 affordable housing resolution, urgent action is needed to address the City's housing crisis.	N	Comment acknowledged	None		
189	Jim Roth	Housing	A robust comprehensive plan will help create a Saint Paul in which all residents and neighborhoods benefit from holistic, equitable community development. Implementation strategies and tools currently listed in the draft plan reflect many of the City's current affordable housing strategies. Although these continue to be important, the comprehensive plan is an opportunity for Saint Paul to develop new strategies and tools to address the city's changing housing needs. To address the large and growing deficit of affordable housing in Saint Paul, and to ensure all neighborhoods have a range of housing types and affordability, the draft comprehensive plan must include more specific tools and strategies, as well as sequenced implementation steps.	N	There is already a fair amount of detail regarding implementation of housing policy in the 2040 Comprehensive Plan. Appendix B contains the City's Housing Need Implementation Strategy, and Appendix C contains the Housing Implementation Toolkit. The Figure I-4 in the Implementation chapter lays out broader direction for future work.	None		

190	Jim Roth	Housing	Increasing safe and stable housing opportunities for Saint Paul requires that we actively invest in our housing infrastructure. MCCD is encouraged by the recent creation of an Affordable Housing Trust Fund in Saint Paul, and believe the City should proactively partner with the nonprofit development community to increase the leverage of the Trust Fund's resources. A shrinking affordable housing stock, population growth, and a high-number of already cost-burdened households all underscore the need for robust dedicated funding streams for the preservation and production of affordable housing. While the draft plan housing chapter mentions various potential funding sources in its appendices, it does not elaborate on how the City of Saint Paul will increase its competitiveness for state or philanthropic resources to support the goals and policies outlined in the chapter.	N	There is already a fair amount of detail regarding implementation of housing policy in the 2040 Comprehensive Plan. Appendix B contains the City's Housing Need Implementation Strategy, and Appendix C contains the Housing Implementation Toolkit. The Figure I-4 in the Implementation chapter lays out broader direction for future work.	None		
191	Jim Roth	Housing	The draft comprehensive plan also does not yet address how the City will meet specific housing production goals required by the Metropolitan Land Planning Act and the Metropolitan Council 2040 Housing Policy Plan: 1,973 affordable housing units over the coming decade, 832 (42%) of which should be affordable to households at or below 30% of Area Median Income (AMI). It is concerning that the current draft lacks detailed information on fiscal and policy tools to develop housing for residents at or below 30% of AMI. Producing deeply affordable housing requires operating and rent subsidies. The City must develop new revenue sources and strategies to prioritize assistance for extremely low-income households. The City of Saint Paul also has a large need for housing that is affordable to households earning 51-80% of AMI. 1,013, or 52%, of the City's affordable housing allocation from the Met Council should be available to these households, yet the draft plan lacks specificity of how resources will support affordable rental or ownership opportunities for households between 51-80% AMI.	N	The Mayor and City Council created the Housing Trust Fund to focus on the preservation of existing and production of new affordable housing, and protection of people living in affordable housing. H-18 addresses the need to preserve and produce deeply affordable housing. The Saint Paul Public Housing Agency (PHA) is a strong partner in this work through Project - Based Section 8 Voucher Rental Assistance. Upfront subsidies are provided so owners can afford to keep rents affordable. Both the plan (p. 111) and appendices (p. 142) make reference to this.	None		
192	Jim Roth	Housing	Saint Paul's existing housing stock requires urgent attention. As noted in the draft, ensuring existing housing is well-maintained was a key theme from community engagement. MCCD supports the preservation-focused policies to support Goal 1 of the Housing Chapter: Decent, safe, and healthy housing for all Saint Paul residents. The final version of the comprehensive plan should include more detailed information about how the City will increase its attention and resources for preservation strategies. Expanding the City's capacity for small building rental rehabilitation programs, combined with nonprofit ownership for maximum impact, are needed to improve this housing stock and maintain its affordability. Additional investments in home improvement programs for homeowners with low incomes are also needed to ensure preservation strategies are focused along the entire continuum of housing in Saint Paul.	N	The Comprehensive Plan is a high-level policy document, not a budget document or strategic work plan. The specifics about how the City will increase its attention to and resources for preservation strategies will be included in subsequent work programs.	None		

193	Jim Roth	Housing	Troubling and harmful racial disparities continue to limit the City’s progress towards economic inclusion. The comprehensive planning process highlights that the ways in which people move in and out of neighborhoods are not accidental -- residential patterns reflect segregation and differing access to opportunity by race and ethnicity. As Saint Paul grows, community development investments must be made through a lens of fair housing and racial equality. In the current draft plan, there is a lack of targeted policy solutions for communities of color, especially American Indian/Native American and African American populations. The City has a responsibility to guide land use and community investments to meet our changing demographics, while also working to overcome discriminatory housing practices that have limited opportunities for communities of color.	N	We agree. The Introduction chapter of the plan notes that the City supports the equitable geographic allocation of public funding and investment to ensure residents have the resources they need to thrive. The emphasis on equity on page 8 states that investment must be done in a way that reduces racial disparities. Targeted policy for specific communities of color is beyond the general policy approach of the 2040 Comprehensive Plan.	None		
194	Jim Roth	Housing	MCCD and our members envision a Saint Paul in which all residents can afford their home, and have meaningful choices in where they live. To achieve this vision, MCCD and our members are eager to actively work with the City to address Saint Paul’s housing affordability crisis. The production and preservation of affordable housing is incredibly complex, and requires significant collaboration. Nonprofit community developers play an integral role in creating and preserving affordable housing, even when the market or the specifics of a project are challenging. We look forward to further refinement of the City’s comprehensive plan, particularly increased specificity for local sources of funding, and local policies and strategies that will result in meaningful implementation to meet existing and projected housing needs.	N	We welcome your support and look forward to continuing to partner with you on this very important work.	None		

195	Tyler Teggatz	Housing	Multi-family housing should be allowed everywhere.	N	<p>The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.</p>	None		
-----	---------------	---------	--	---	--	------	--	--

196	Rick Varco	Housing	St. Paul should follow the lead of Minneapolis and use the St. Paul 2040 plan to set the stage for a broad comprehensive upzoning of the entire city. This is the easiest way for the city to reduce the cost of housing for all residents, mitigate the danger of climate change, ease racial segregation, expand our tax base, and provide opportunities for high-quality jobs. While the initial draft has many strong hints in this direction, I believe many policy suggestions need to be clarified and made more firm.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	None		
-----	------------	---------	---	---	---	------	--	--

197	Rick Varco	Housing	I support building the plan around meeting the needs of the expected population growth (344,100 by 2040 p. 6). In general, this goal requires a broad upzoning of all parts of the city. The city must allow the private market the flexibility to add housing when/where it is needed. I strongly agree “the only way to grow is by increasing densities on infill parcels as they become available” (p. 8). But, the only way to make sure that happens is to broadly upzone the city and the plan needs more specific language towards that end.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	None		
198	Rick Varco	Housing	More importantly the population goal needs to be supplemented in two important ways. First, we need more explicit calculations about exactly how much of the city must be upzoned to meet this target. For example, if all currently single-family only zones were converted to RM1 or T3, how much additional housing could we expect to see? We will not reach the target with a general aim of ‘more’, we need specific targets.	N	Specific targets are not particularly meaningful, because housing is more complicated than just "number of units." Housing type, cost, access to transit and other considerations impact how and where people live.	None		
199	Rick Varco	Housing	Second, we should not reach for the minimum goal of accommodating the population target. Not only do we want people to live here, we want them to live here at a price they can easily afford. Our goal should be to allow enough housing not only to accommodate the expected growth, but to allow sufficient excess capacity to ensure that renters and buyers will be able to get a good deal. We should aim for enough extra housing to accommodate the population and provide for a vacancy rate sufficient to keep costs down.	N	Comment acknowledged	None		
200	Rick Varco	Housing	In regards to the themes laid out on page 10, the city should give much more weight objective, universal values like the affordability of housing and access to jobs as compared to subjective, personal values like “sense of community”. People without affordable housing options have no choice, while people who object to their “neighborhood’s character” can move. In particular, irrational fears about “public safety” should not be allowed to block additional multi-unit housing with diverse residents.	N	The themes on p. 10 came out of the extensive community engagement City staff conducted in the beginning of the planning process.	None		

201	Rick Varco	Housing	First, the draft should clarify that these values apply with equal weight to both current and potential future residents. Especially when evaluating increased density, we must consider the benefits to those who will have a chance to live in the new construction. What happens to people if we don't allow enough housing to be built to accommodate them?	N	Comment acknowledged	None		
202	Rick Varco	Housing	Second, while I support the call for more "housing choice" (p.10) the draft needs to clarify that there is no meaningful "housing choice" when the vast majority of the city is zoned for one kind of housing (single family) and is required to provide one kind of transportation infrastructure (parking). Real housing choice requires that we allow multi-family housing on every parcel and that no parcel be required to have a parking minimum.	N	Comment acknowledged	None		
203	Rick Varco	Housing	We need to provide more housing in the most desirable and expensive areas of the city.	N	Comment acknowledged	None		
204	Rick Varco	Housing	It is disingenuous to say that "the City does not have full control of housing development" (p. 110). In fact, the City has banned everything but single family residential housing in 80-90% of the city. It has done so to exclude people of color and low-wage workers. The draft should recognize this history and explicitly call on the city to reverse course. Instead, the City should adopt a policy of allowing abundant and affordable housing.	N	The City does not have full control of the entire housing market. Page 110 and Page 164 in Appendix A discuss affirmatively furthering fair housing.	None		
205	Rick Varco	Housing	Similarly, it is not true that the city has a "decades-old commitment to an all-incomes housing strategy" (p. 110). Instead, the city has a policy to restrict the supply of housing to prevent low-income and people of color from building more affordable multi-family housing in much of the city.	N	70% of City/HRA funds are aimed at housing units affordable at 60% and 80% AMI. The City has a long standing commitment to an all-incomes housing strategy, including the 10/10/10 housing affordability policy, which is part of the existing 2030 Comprehensive Plan.	None		
206	Rick Varco	Housing	Delete H-7. This does not need to be a city priority. If people overcrowd a unit it is probably better than their other alternatives, such as the street. Overcrowding should be solved by allowing additional construction.	N	Overcrowding is an issue in Saint Paul, and is a matter of public health, safety and welfare.	None		
207	Rick Varco	Housing	H-15-17 are too vague and unspecific. They should require broad upzoning without parking minimums	N	Comment acknowledged.	None		
208	Rick Varco	Housing	H-47: Delete "compatible with the pattern and scale of the neighborhood". This is not a valid public policy goal. Cities can't grow and develop, if we restrict them to existing patterns.	Y	OK	Revise Policy H-47 to read as follows: Encourage high-quality urban design for residential development that is <u>sensitive to context</u> , but <u>also</u> allows for innovation and consideration of market needs.		Agree
209	Rick Varco	Housing	H-48: I strongly support this essential recommendation. The draft should clarify that this applies to everything labeled "Urban Neighborhood" on page 43. In addition, this should apply to each individual parcel in those areas.	N	This is adequately covered in existing plan language.	None		

210	Rick Varco	Housing	Finally, “small-scale multi-family” should be more clearly defined to include, at minimum, 3 story, 6-plex structures.	N	The reference to small-scale multi-family in the policy is intentionally vague to allow for flexibility in housing type.	None		
211	Tyler Blockmon	Housing	St. Paul should adopt a 2040 plan that provides abundant and affordable housing for our growing population. We should follow the Minneapolis 2040 plan and relax government restrictions on multi-family housing throughout the city and eliminate parking requirements.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and have added the elimination of parking minimums to the study.	None		
212	Tyler Blockmon	Housing	Legalizing the option of dense multi-family housing throughout the city allows us to address the danger of global climate change, help reduce racial segregation, and promote good construction jobs in the city.	N	Policy H-48 calls for expanding permitted housing types in Urban Neighborhoods. LU-33 encourages medium-density housing that diversifies housing options.	None		
213	David Sullivan-Nightengale	Housing	While many features of this plan cover housing efficiency, very little is mentioned about home and rental property safety. Lack of carbon monoxide detectors, smoke detectors, and home sprinklers will kill far more people than not having solar panels on individual homes and apartments.	N	H-1, H-2, H-4, H-5 and H-6 all address elements of housing safety.	None		

214	David Sullivan-Nightengale	Housing	The number of elderly residents who perish due to lack of air conditioning and heating continues to be the number one cause of weather related deaths in St. Paul. Fire fatalities continue to occur in both old a new homes despite having smoke detectors. Homes and electrical infrastructure are not designed or robust enough to handle additional current loading to charge electrical vehicles.	N	Comment acknowledged	None		
215	David Sullivan-Nightengale	Housing	Please show us a map where new small businesses are popping up on a map and turnover rates for businesses and housing. The Hill business library should have data we can use on this.	N	This information is not necessary for a long-range Comprehensive Plan.	None		
216	Coalition of Asian American Leaders	Housing	Housing and homelessness. Share data from fair housing tests related to Asian prospective renters. Expand homeownership counseling programs that work with Asian prospective homeowners. Continue interdepartmental coordination and implementation of the recommendations of the Analysis of Impediments report and other fair housing issues. Support alternative household types such as co-housing, intentional communities or other shared-living models that allow residents to age in community.	N	These ideas are generally supported in the Comprehensive Plan. Focusing actions towards Asian renters and homeowners would be determined through subsequent work program priorities.	None		
217	Luke Hanson	Housing	St. Paul should adopt a 2040 plan that provides abundant and affordable housing for our growing population. We should follow the Minneapolis 2040 plan and relax government restrictions on multi-family housing throughout the city and eliminate parking requirements.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and have added the elimination of parking minimums to the study.	None		

218	Luke Hanson	Housing	Legalizing the option of dense multi-family housing throughout the city has many benefits. First, it will promote good construction jobs in the city, and give homeowners opportunities to improve their economic well-being by converting their houses into multiple dwelling unites. Higher population densities will make it financially practical to add more numerous and frequent transit options, making it more practical for St. Paulites to live without a car. Higher population density will enable more local businesses to flourish. More people walking and taking transit will mean better public health, a stronger sense of community, and the greater public safety that results from more “eyes on the street.” A more population-dense St. Paul will be more environmentally sustainable, and more economically resilient to the effects of climate change. A St. Paul with more affordable housing options throughout the city will be less racially and socioeconomically segregated. A St. Paul with more housing options will provide seniors with more options to age in place, and low wage workers with close proximity to high-wage jobs in the city. In order to realize this vision, the St. Paul 2040 Comp Plan needs sharper teeth.	N	The Saint Paul Comprehensive Plan is a higher-level policy document. All of the ideas suggested by the commenter are supported in the draft 2040 Plan.	None		
219	Luke Hanson	Housing	For example: Policy H-48 should be strengthened, perhaps with one simple word: “Expand permitted housing types in *all* Urban Neighborhoods [that is, every neighborhood in St. Paul without exception] ... to include duplexes, triplexes, town homes, small-scale multifamily and accessory dwelling units.”	N	"Urban Neighborhoods" is a Future Land Use category in the Land Use chapter.	None		

220	Luke Hanson	Housing	Policies H-15, H-16, and H-17 are good, but they should be strengthened to require broad upzoning without parking minimums.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and have added the elimination of parking minimums to the study.	None		
221	Luke Hanson	Housing	In H-47, the language “compatible with the pattern and scale of the neighborhood” should be deleted. This goal should never supersede the priorities of adding dense, affordable housing, and this language can only serve to block needed density.	Y	OK	Revise Policy H-47 to read as follows: Encourage high-quality urban design for residential development that is <u>sensitive to context</u> , but <u>also</u> allows for innovation and consideration of market needs.		Agree
222	Luke Hanson	Housing	I strongly support H-48.	N	Comment acknowledged	None		
223	Luke Hanson	Housing	In regards to Housing, p. 110: It is disingenuous to say that “the City does not have full control of housing development.” The city has banned everything but single family residential housing in 90% of the entire city, at the expense of people of color and low-wage workers. This document should recognize this history and explicitly call on the city to reverse course; and it should adopt a policy of allowing and encouraging abundant and affordable housing.	N	The City does not have full control of the entire housing market. Page 110 and Page 164 in Appendix A discuss affirmatively furthering fair housing.	None		
224	Luke Hanson	Housing	Universal values like affordability of housing and access to jobs should always trump subjective, personal values like a “sense of community.”	N	Comment acknowledged.	None		

225	Eric Saathoff	Housing	I hope the city takes this opportunity to eliminate parking minimums citywide. There is no reason that the city should be enforcing a car-centric transportation system. Residents and business owners should decide what amount of parking they need and supply it themselves. This is an easy way to make housing more affordable and make it easier to do business in our city.	N	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	None		
226	Eric Saathoff	Housing	I also hope the city will take this opportunity to follow the footsteps of Minneapolis in upzoning either the entire city or vast portions of it. There is no way to reduce the cost of housing by restricting the supply. The city of St. Paul has an enormous amount of single family zoned neighborhoods. We need to upzone to allow more supply of housing. If this is to be done in nodes, there should be more nodes that follow transit corridors (bus lines) and existing commercial corridors.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	None		

227	Al Davison	Housing	Regarding land use, more mixed-use and medium-density development can help strengthen our neighborhoods and it will help with the current housing shortage. Higher-density development can help further strengthen our downtown, and other places such as around Snelling and University. Saint Paul has the ability to support more residents and through reforming zoning regulations, the city could allow better opportunities for more housing choices across the city. The city can support more multi-family housing without affecting the city’s large stock of single-family homes. Sites such as the Ford Site can help preserve the existing housing stock within Highland Park, while still adding more housing units of various types (from single-family to multi-unit apartments/condos). It is good that the city acknowledges the importance of infill development in the 2040 plan, but having a strong emphasis on strict height limits and other regulations has affected development from occurring in the city in the past; zoning reform of a large scale must be done in order to truly invest in future developments across the city, regardless if it is located in a designated “neighborhood node” or not.	N	Comment acknowledged	None		
228	Al Davison	Housing	The city’s residents face inequality based off racial and socioeconomic factors and housing has a major impact on people’s lives. The city needs more housing, especially housing that low and middle-income residents can afford. Neighborhoods such as Rondo and the North End will thrive more when residents are able to have better housing choices. The current exclusionary zoning regulations that the city has restricts housing into single-family zones in many areas, which has contributed to the current housing shortage and income inequality that residents face. Duplexes, triplexes, and fourplexes easily integrate into areas that primarily contain single-family housing and they can help reduce housing costs. Accessory dwelling units (ADUs) are another great way to add small-scale housing options within existing lots. I currently live in a sevenplex in what used to be a single-family home, and since that was allowed to happen before existing zoning restrictions – the existing housing stock was preserved, with the benefit of the addition of more affordable housing units to the city’s housing stock. I likely wouldn’t be living where I am today if the current zoning regulations blocked this house from becoming a sevenplex.	N	Comment acknowledged	None		

229	Zack Mensinger	Housing	I really love many aspects of the 2040 plan as written. Two of the most important changes that could be enacted are upzoning and eliminating parking minimums. With that in mind, I think two of the most important aspects of the plan are those in H-48, which upzones nearly all of the city, moving away from racially discriminatory single-family zoning, and those in LU-13/14, discussing parking.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and have added the elimination of parking minimums to the study.	None		
230	Zack Mensinger	Housing	H-48 will provide some significant options to expand housing opportunities in St. Paul, while eliminating zoning that promotes racial segregation. This will help increase overall housing choice in the city and return us to a time when more flexible housing options provided different living situations for a variety of people, instead of segregating areas of the city into those who can or cannot afford single-family housing.	N	Comment acknowledged	None		
231	Zack Mensinger	Housing	We are already seeing the effects of housing cost challenges, as evidenced by the increasing number of those with insecure housing using transit as shelters and camping in public spaces. Without an increase in housing options city-wide, there will be little chance to stave off further challenges for these vulnerable people.	N	Comment acknowledged	None		

232	Center for Economic Inclusion	Housing	<p>The Center advocates that all municipalities incorporate the following elements into their comprehensive plans:</p> <ol style="list-style-type: none">1. A goal to develop a racially equitable economy;2. Data analysis, consistently disaggregated by race, to identify racial disparities in access to affordable housing, transit, living wage jobs and economic development;3. Policies and strategies specifically designed to close the identified racial disparities;4. A commitment to evaluating the impact of these policies and strategies on people of color, and to adapting those policies and strategies based on that evaluation.	N	<p>The Plan strives for what the comment advocates. The Introduction chapter of the Plan supports the equitable geographic allocation of public funding and investment to ensure residents have the resources they need to thrive. Policies LU-3 and H-20 are designed to close the racial disparities. Data analysis, disaggregated by race, will be done as a work program item to track progress.</p>	None		
233	Center for Economic Inclusion	Housing	<p>Re: data - Saint Paul for All contains some disaggregation of data by race, especially in the housing chapter. Also, the mapping of the “Area of Concentrated Poverty with 50% or More of People of Color” (ACP50) in relation to other data visually demonstrates how race, income, and geography coincide with poverty, homeownership, and education.</p>	N	<p>Comment acknowledged</p>	None		
234	Center for Economic Inclusion	Housing	<p>Re: data - The Center encourages the City to build upon the ACP50 analysis with a more in-depth analysis that disaggregates data by race city-wide (and by smaller geography, as needed). While the Introduction cites the homeownership gap between whites and People of Color (POC), the Center encourages the City to break down the broad category of POC into more specific racial categories, as the data allows. One place to start would be to disaggregate the data mapped in Appendix A to the Introduction by race, such as poverty and homeownership (similar to how the housing chapter breaks down housing cost burden and homelessness by race).</p>	N	<p>Disaggregated data is provided on pages 151, 152, and 162 in Appendix A for information about cost burden. Data analysis, disaggregated by race, will be done as a work program item as we are able. In addition, a racial equity assessment can be used when evaluating projects.</p>	None		
235	Center for Economic Inclusion	Housing	<p>Re: data - The data analysis in the housing chapter of the plan is detailed and comprehensive. The Center encourages the City to provide additional data on the current state of economic inclusion in Saint Paul in the plan, and to disaggregate this data by race. Example data sets for this analysis might include: labor force participation, unemployment, mapping of jobs in relation to communities of color, mapping of jobs in relation to transit accessibility, median household income, poverty level, high school graduation (and other educational attainment) and business ownership.</p>	N	<p>Data analysis, disaggregated by race, will be done as a work program item.</p>	None		

236	Center for Economic Inclusion	Housing	Policy H-20 states “Collaborate to reduce racial disparities in homeownership that could be attributed to unequal access to fair lending or intentional steering to specific neighborhoods.” The Center applauds the City for this policy to reduce racial disparities in homeownership. However, it is not clear why it limits City action to disparities that are based on unequal access to lending or intentional steering to specific neighborhoods. Are there data to show that these are the primary drivers of the homeownership gap? What role does the difference in generational wealth play?	Y	OK	Revise Policy H-20 to read: Collaborate with partner agencies, lenders and the real estate industry to reduce racial disparities in homeownership that could be attributed to unequal access to fair lending, intentional steering to specific neighborhoods, <u>historic housing discrimination or possible factors.</u>		Revise Policy H-20 to read: Collaborate with partner agencies, lenders and the real estate industry to reduce racial disparities in homeownership that could be attributed to unequal access to fair lending, intentional steering to specific neighborhoods; <u>or historic housing discrimination. or possible factors.</u>
237	Center for Economic Inclusion	Housing	Policy H-56 states “Improve the stability and health of communities of concentrated disadvantage by implementing place-based investments, such as public infrastructure, improvements and maintenance.” The Center encourages the City to clarify this policy. What does “concentrated disadvantage” refer to? How does it relate to the ACP50? If H-56 is referring to a similar geographic area, how does this policy differ from LU-3? The Center encourages the city to clarify the relationship between these policies.	N	This language was written purposefully and is not synonymous with ACP50s. It does not apply to a specific geography, but is meant to be broader (ACP50s do not capture all of the communities of concentrated disadvantage). The language is based on work that the City’s housing staff is doing in fair housing, as well as staff’s community development general knowledge. Policy H-56 is in the Housing chapter because housing is one of many characteristics that make up a neighborhood; housing helps stabilize neighborhoods.	None		
238	Tom Dimond	Housing	We must demand nothing less than a city where: * all neighborhoods have high quality attractive housing that serves people of all incomes	N	Comment acknowledged	None		
239	Tom Dimond	Housing	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.	N	Comment acknowledged	None		
240	Tom Dimond	Housing	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.	N	Comment acknowledged	None		

241	Tom Dimond	Housing	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.	N	Comment acknowledged	None		
242	Tom Dimond	Housing	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.	N	Comment acknowledged	None		
243	Tom Dimond	Housing	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.	N	Not sure what the commenter is referring to, but we do not agree. The Comprehensive Plan supports these things for both the East Side and West Side.	None		
244	Tom Dimond	Housing	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.	N	The Comprehensive Plan supports all of these things.	None		

245	Saint Anthony Park Community Council (SAP)	Housing	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.	N	Comment acknowledged	None		
246	Saint Anthony Park Community Council (SAP)	Housing	1. 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.	N	LU-33 supports incremental increases in density in the areas designated as 'Urban Neighborhoods' in the Land Use chapter.	None		
247	Saint Anthony Park Community Council (SAP)	Housing	14. Medium density housing should be allowed by right (as per Policy H-48), rather than simply “encouraged” in Urban Neighborhoods (Policy LU-33).	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	None		
248	Saint Anthony Park Community Council (SAP)	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.	N	Comment acknowledged	None		

249	Saint Anthony Park Community Council (SAP)	Housing	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.	N	Policy H-16 addresses housing choice and diversity. Policy H-20 addresses homeownership specifically.	None		
250	Saint Anthony Park Community Council (SAP)	Housing	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.	N	The policy says to “consider use of official controls...” The City Council has requested that City staff explore the impacts and advantages of a city-wide and/or targeted inclusionary zoning policy, and report back by the end of 2019.	None		
251	Saint Anthony Park Community Council (SAP)	Housing	We reiterate our support for H-48, allowing neighborhood-scale increases in density by right in Urban Neighborhoods.	N	Comment acknowledged	None		
252	Dan Marshall and Millie Adelsheim	Housing	We strongly believe that the comprehensive plan should promote and allow density throughout the city, not just along transit corridors. We should follow Minneapolis' lead and abolish exclusionary zoning that allows only single family homes. By design, single family zoning promotes car use, reduces walkability, and tends to exclude low-income residents, stratifying our city by income.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	None		

253	Dan Marshall and Millie Adelsheim	Housing	There is high demand for more housing throughout the city. Promoting increased density will not only help meet this growing need, but will also increase the city's tax base, promote transit over car use, and provide more customers for local small businesses. Density needs to be encouraged everywhere in order to prevent gentrification and sprawl. If we don't allow growth in more affluent neighborhoods currently dominated by single family homes, then growth will occur only in less affluent neighborhoods and the exurbs.	N	Comment acknowledged	None		
254	Dan Marshall and Millie Adelsheim	Housing	We also need to end discriminatory restrictions on student rental housing. Students should have the same right to live anywhere in the city as other tenants do. Prohibiting students from certain affluent neighborhoods is unfair and creates unintended consequences in other neighborhoods. Saint Paul should be a city for all.	N	Policy H-53 addresses working to reduce neighbor-student conflicts.	None		
255	Karen Allen	Housing	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.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	None		
256	Karen Allen	Housing	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.	N	Comment acknowledged.	None		

257	Karen Allen	Housing	Where I differ 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.	N	These ideas are supported in the Heritage and Cultural Preservation chapter.	None		
258	Karen Allen	Housing	<ul style="list-style-type: none">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.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	None		

259	Karen Allen	Housing	<ul style="list-style-type: none">• LU-7 is too vague. The city should broadly upzone and allow multi-family housing without parking minimum throughout the city.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	None		
260	Karen Allen	Housing	<ul style="list-style-type: none">• LU-13 Change “reduce parking minimums” to “eliminate”. Especially pertinent for small multi-family residences (duplex up to ‘missing middle’ style buildings)	N	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	None		
261	Karen Allen	Housing	<ul style="list-style-type: none">• 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.	N	The City does not have full control of the entire housing market. Page 110 and Page 164 in Appendix A discuss affirmatively furthering fair housing.	None		

262	Karen Allen	Housing	Goal 1: Add Policy to recognize that single family only zoning contributes to obesity and heart disease at the individual level and air pollution at the community level.	N	Comment acknowledged.	None		
263	Karen Allen	Housing	Goal 1: Delete H-7. This does not need to be a city priority.	N	Overcrowding is an issue in Saint Paul, and is a matter of public health, safety and welfare.	None		
264	Karen Allen	Housing	Goal 1: We need an explicit calculation of if we will meet the Affordability Housing Allocation.	N	The City has met the goals set by the Metropolitan Council each year and often exceeds these goals. The goals in this policy are based on a strong foundation of what is attainable with existing resources. Page 136 of Appendix A addresses production and preservation of affordable housing units.	None		
265	Karen Allen	Housing	• Goal 2: Add labor standards	N	Including reference to labor standards is beyond the scope of the Comprehensive Plan.	None		
266	Karen Allen	Housing	• Goal 3: H-15-17 require broad upzoning without parking minimums	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	None		

267	Karen Allen	Housing	<ul style="list-style-type: none"> • Goal 7: o H-48: Strongly support. Clarify “small-scale multi-family” 	N	The reference to small-scale multi-family in the policy is intentionally vague to allow for a wide range of housing types.	None		
268	Karen Allen	Housing	<ul style="list-style-type: none"> • Goal 7: o Add policy to exempt all publically owned/subsidized housing from all zoning limits. 	N	This is not legal. Every parcel of land, regardless of ownership, must comply with zoning.	None		
269	Creative Enterprise Zone	Housing	Our focus is on the real and urgent threat to the stability of the area that must be addressed through a combination of land use, zoning, public investment, and civic engagement. We have heard a Chicago based developer indicate that the CEZ is the “last real value in the entire country for real estate development.” The pace of real estate sales for current building stock, the rate of development—commercial and community including increased households—shows that transit produces transformative development for a region. We acknowledge that increased density, mixed uses, and the pressure of displacement will continue to define the area.	N	Comment acknowledged	None		
270	Housing Justice Center	Housing	<p>The Housing Justice Center (HJC) is a Twin Cities based public interest law firm focused on preserving and expanding the supply of affordable housing. We write to offer comments on the Housing Chapter of Saint Paul’s Comprehensive Plan. Under the Metropolitan Land Planning Act and the Metropolitan Council’s 2040 Housing Policy Plan, the housing elements of comprehensive plans must include the following elements which are lacking in substantial ways in the current draft Plan:</p> <ol style="list-style-type: none"> 1. Standards, plans, programs, fiscal devices, and other specific actions to be undertaken in a stated sequence which “will” meet existing local and regional affordable housing needs. 2. A description of the tools the City will employ to address housing needs and the sequence for their implementation. 	N	Appendix B contains the Housing Need Implementation Strategy, which includes affordable rental housing. Appendix C contains the Housing Implementation Toolkit.	None		
271	Housing Justice Center	Housing	<p>The council’s Planning Handbook adds the following requirements:</p> <ol style="list-style-type: none"> 1. A clear and direct linkage between needs identified and tools to be employed, focusing on different levels of affordability. Plans consistent with Council policy will consider all widely accepted tools to address their housing needs. 	N	These are included in Appendix B, Housing Implementation Strategy, and Appendix C, Housing Implementation Toolkit.	None		
272	Housing Justice Center	Housing	While the current housing chapter of the 2040 Comprehensive Plan addresses some of our previous concerns about the prior draft of the 2040 Comprehensive Plan, it does not adequately address the requirements of the Minnesota Land Use Planning Act related to affordable housing, nor does it take advantage of the opportunity to make meaningful progress toward addresses the serious and persistent shortage of affordable housing in Saint Paul	N	Policies related specifically to affordability include H-36 through H-45. Appendix B contains the Housing Need Implementation Strategy, which includes financial resources/strategy, regulations/ agreements/plans, strategic partnerships and education/information.	None		

273	Housing Justice Center	Housing	According to the Metropolitan Council, there will be 6,700 new households in Saint Paul in the coming decade, requiring 1,972 new units of affordable housing. Of this, 832 units must be affordable to people at or below 30% of AMI. This means that 12% of all new housing units in the city must be affordable to extremely low-income households in order for Saint Paul to meet the need as determined by the Met Council. Additionally, the Met Council determined that the city needs an additionally 128 units of housing at 31-50% AMI and 1013 units at 51-80% AMI.	N	Comment acknowledged	None		
274	Housing Justice Center	Housing	Policy H-32 on page 117 proposes that all new projects that receive financial assistance from the city need to be at least 30% affordable with 10% of the units at 30%AMI, 10% at 50% AMI and 10% at 60% AMI. Overall the distribution of affordable units is consistent with or better than the Met Council guidance on housing need. However, the policy is very limited in scope, will apply to very few developments, and does not take sufficient advantage of city leverage to create affordable housing opportunities.	N	No change to the 10/10/10 policy is planned. It is a considered and deliberate policy that has been in place for more than 10 years. The City has met the goals set by the Metropolitan Council each year, and often exceeds these goals. The housing affordability goals in this policy are based on a strong foundation of what is attainable with existing resources.	None		
275	Housing Justice Center	Housing	As opposed to limiting affordable housing requirements to direct project financial assistance, the city should require affordable units in all multifamily developments where the city has financial or political leverage including changes in land use. At a minimum, the requirements should be triggered when the city is asked to contribute financially to development in indirect ways such as the creation of new infrastructure supportive of a housing development.	N	When the City/HRA supports multi-family developments financially, most often some level of affordable units are required by the City/HRA. The City Council has requested that City staff explore the impacts and advantages of a city-wide and/or targeted inclusionary zoning policy, and report back to the City Council by the end of 2019.	None		
276	Housing Justice Center	Housing	The current iteration of the Housing Chapter acknowledges on page 164 that the most pressing need for housing is for households with incomes below 30% AMI and the failure of Low-Income Housing Tax Credit developments to address housing needs for people at or below 30% AMI. People at or below 30% AMI are also identified as the households most likely to be housing cost burdened. Currently, there are over 15,000 households with incomes at or below 30% AMI pay more than 50% of their income on housing costs. The overwhelming majority of housing cost burdened households in Saint Paul, about 77%, are households at or below 30% AMI.	N	Comment acknowledged	None		

277	Housing Justice Center	Housing	A critical fact that the City’s analysis fails to add is that provision of housing affordable to households with such extremely low incomes absolutely requires annual operating subsidies because 30% of these incomes generally won’t be sufficient to cover rental housing operating costs. Therefore, even deep capital subsidies that eliminate the need for any amortizing debt are not sufficient. The proposed solution, as articulated on page 169 of the plan, is to lobby the state and federal government for more resources to meet this need and to “explore ways to get deeper affordability for extremely low-income households that may not need supportive services.”	N	It is not always true that operating subsidies are required. The Plan advocates for increased Federal, State and local funding for affordable rental housing in Appendix B.	None	
278	Housing Justice Center	Housing	This does not adequately address the requirements of the Minnesota Land Use Planning Act of the Met Council’s planning guide. A key legal requirement of Minnesota Statutes § 473.859 Subd. 4 is that the Comprehensive Plan must include an implementation plan setting out standards, plans, programs, fiscal devices, and other specific actions which “will” meet existing and projected local and regional affordable housing needs. The Plan fails to articulate any city actions that will even address the problem, let alone address it in a meaningful way. Asking for more money from the state and federal governments is not a city plan, program or fiscal device which will produce any units at 30% of AMI, let alone the number allocated to the city by the council.	N	Appendix B includes the Housing Need Implementation Strategy, which includes City actions to address the city’s affordable rental housing need. Appendix C includes the Housing Implementation Toolkit.	None	
279	Housing Justice Center	Housing	While it is laudable that the city intends to “explore ways” this does not rise to the level of a strategy to meet the needs that will produce any number of units of housing that is affordable to households at 30% AMI or below. The plan should include the specific strategy of creating a funding source for that creates housing opportunities for households at 30% and below AMI.	Y	OK	Amend H-42 to read: “Pursue public and private funding sources, <u>including local sources</u> , for affordable housing preservation and production. Amend H-43 to read: “Encourage and support state and federal legislation that preserves existing programs and provides new funding, <u>including a dedicated funding source</u> , for affordable ownership and rental housing.	Agree

280	Housing Justice Center	Housing	The Met Council's handbook requires a narrative analysis of existing housing needs clearly identifying existing needs and priorities and addressing potential barriers to meeting those needs. While the plan indicates that standard affordable housing tools fail to meet this need, it does not sufficiently explore the barriers or mention the main barrier – the need for operating subsidies - nor does it indicate what tools are available that are under the purview of the city that could be used to meet at least some of the need for deeply affordable housing. The comprehensive plan fails to indicate that rent and operating subsidies are required to make units affordable to households at 30% and below AMI. This is both a key barrier to meeting the need for more housing at 30% and below AMI, it is also an area where the city could create actual strategies, including creating specific funding sources, to meet the need as required under the Land Use Planning Act.	N	Policy H-18 addresses the need to preserve and produce deeply affordable housing. The Saint Paul Public Housing Agency is a strong partner in this work, through Project - Based Section 8 Voucher Rental Assistance. Upfront development subsidies (capital) are provided so owners can keep rents affordable by lowering mortgage rates (capital side) at 30% AMI. Both the Plan (p. 111) and Appendices (p. 142) make reference to this. Appendix A, pages 163 and 164, states that the greatest need for affordable housing is for rental households earning 30% or less of AMI. Appendix C provides an overview of the City's Housing Implementation Toolkit.	None		
281	Housing Justice Center	Housing	The Plan's failure to meaningfully address the desperate need for housing affordable to extremely low-income households has obvious fair housing consequences. HUD's 2010-2014 CHAS data indicates that households of color are more than twice as likely as white, non-Hispanic households to be severely cost-burdened renters (more than 50% of income for rent).	N	Comment acknowledged	None		
282	Housing Justice Center	Housing	The implementation steps outlined in the current iteration of the plan are in many cases too vague, general, or tentative to meet the standards set out in the Land Use Planning Act. Not only does the current plan fail to meet the legal standard of creating a set of specific strategies with sequenced implementation steps to carry out those strategies, but it also fails to take advantage of the opportunity to develop new ways to address the growing need for more affordable housing. This should include new local revenue sources and new policies that support the development and preservation of affordable housing opportunities, with a focus on meeting the needs of households at or below 30% AMI.	Y	The Mayor created the Housing Trust Fund to focus on the preservation of existing and production of new affordable housing, and the protection of people living in affordable housing. Policy H-18 addresses deeply affordable rental housing. H-27 addresses preserving project-based Section 8. H-31 supports new affordable housing throughout the city. H-32 supports the use of resources for affordable rental housing to various levels of affordability. H-33 and H-34 support affordable home ownership. H-36 encourages family-sized affordable housing; policies related to affordability continue through H-45.	Revise language on page 169 in Appendix B to add advocating for increases in local funding sources. The third bullet should read: Advocate for increased Federal, State, <u>and local funding</u> for affordable housing (target incomes: ≤60% of AMI, with focus on ≤30% of AMI).		Agree

283	Housing Justice Center	Housing	Overall the plan includes a long list of strategies, including some that have the potential to address some of the most important housing issues faced by the city, but many of these policies are not tied to specific strategies or implementation plans that would make the proposed policies meaningful. For example, while it is good to know that there are continuing discussions about the preservation of unsubsidized affordable housing, the comprehensive plan should do more than vaguely reference that there might be a plan at some future point in time.	N	The plan acknowledges the need and the gap in available resources to meet the need. It advocates for increased local, State and Federal funding. The Mayor created the Housing Trust Fund to focus on preservation and production of affordable housing, and protection of people living in affordable housing.	None		
284	Housing Justice Center	Housing	<p>There are a variety of other important issues that the plan mentions but does so in a manner that is too vague to be meaningful. Among these are:</p> <ol style="list-style-type: none"> 1. H-15 does not include sufficient detail or analysis to be understandable of actionable. 2. H-16 mentions policies and practices to create housing choice but describes neither the practices nor the policies 3. H-20 states that the city will collaborate to address steering, but does not mention any specific ideas, policies, or strategies to address intentional steering 4. H-28 states that the city will do research about best practices and policies to address housing barriers in the tenant selection and screening process. The city should do the research as part of the comp planning process and set out specific plans for adoption of those best practices in the comp plan itself. 5. H-35 says that the city will “explore” mechanisms to ensure long term affordability of HRA developed homeownership opportunities. The city should instead “develop and implement” strategies to this end. 6. H-41 should be changed to include the adoption controls and the policies consistent with the analysis of Inclusionary Zoning feasibility in the implementation toolkit on page 177. 	Y	The Saint Paul Comprehensive Plan is a high-level policy document, intended to set the stage for subsequent work and funding. Regarding inclusionary zoning, the City Council has asked City staff to study it and report back to the Council by the end of 2019.	Revise H-35 to read: "Work with partners to explore <u>develop and implement</u> mechanisms to ensure that affordable ownership units developed with City/HRA assistance remain affordable beyond the first generation of owners. "		Agree
285	Housing Justice Center	Housing	A final issue that is not addressed in the Housing Chapter of the Comprehensive Plan is the substantial capital needs backlog of St. Paul PHA properties. An analysis of this issue should include discussion of the PHA’s proposed conversion of its entire stock under the HUD RAD program, and what effect if any RAD conversion will have on both the quality and affordability of this important source of deeply affordable housing.	N	The information requested should come from the PHA.	None		

286	Housing Justice Center	Housing	Saint Paul has the opportunity to create new strategies, develop new resources, and enhance its ability to leverage state and federal dollars. Saint Paul is projected to continue to grow, but without more dedicated local funding sources for affordable housing development, it will remain at a competitive disadvantage in accessing state resources and will continue to fall behind in meeting its housing needs.	Y	The Mayor and City Council created the Housing Trust Fund to focus on the preservation and production of affordable housing, and the protection of people living in affordable housing.	Amend H-42 to read: “Pursue public and private funding sources, <u>including local sources</u> , for affordable housing preservation and production. Amend H-43 to read: “Encourage and support state and federal legislation that preserves existing programs and provides new funding, <u>including a dedicated funding source</u> , for affordable ownership and rental housing.		Agree
287	Housing Justice Center	Housing	We greatly appreciate the time and effort that went into creating the comprehensive plan and the commitment to a just and equitable community that is apparent throughout this document. Thank you for your time and consideration.	N	Comment acknowledged	None		
288	Shannon O'Toole	Housing	The historic and cultural preservation section ignores the city's historic areas west of downtown. I would expect to see goals that preserve those historic areas as well as the affordable housing that is there, and there is little or none of that.	N	This is a city-wide plan that supports the preservation of affordable housing in all neighborhoods. The Heritage and Cultural Preservation chapter guides City historic preservation efforts, including in areas designated as local heritage preservations sites and districts.	None		
289	Shannon O'Toole	Housing	As to affordable housing, the rentals being erected right now are not affordable, and while this plan provides lip service to the concept of affordable housing, it actually provides no mandate or even direction.	N	This is not true. Goal 6 and policies H-31 to H-45 deal with affordability. In addition, Appendix B includes the Housing Need Implementation Strategy, which includes City actions to address the City’s affordable rental housing need. Appendix C includes the Housing Implementation Toolkit.	None		
290	Shannon O'Toole	Housing	Furthermore, since for most of us our wealth tends to be concentrated in our homes, would it not be more equitable to encourage home ownership and means to make home ownership more widespread? To envision and support programs that help people attain home ownership and maintain those homes all around the city?	N	The City needs a mix of all housing types and tenure opportunities. The Housing chapter promotes a supportive environment for both homeownership (policies under Goal 4) and stable rental housing (policies under Goal 5). Appendix B advocates for increasing neighborhood stability and community wealth through homeownership.	None		

291	Jessa Anderson-Reitz	Housing	St. Paul should adopt a 2040 plan that provides abundant and affordable housing for our growing population.	N	The Housing chapter of the 2040 Comprehensive Plan contains policy that does this.	None		
292	Jessa Anderson-Reitz	Housing	We should follow the Minneapolis 2040 plan and relax government restrictions on multi-family housing throughout the city and eliminate parking requirements.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	None		
293	Jessa Anderson-Reitz	Housing	Legalizing the option of dense multi-family housing throughout the city has many benefits. First, it will promote good construction jobs in the city, and give homeowners opportunities to improve their economic well-being by converting their houses into multiple dwelling units.	N	Policy H-48 calls for expanding permitted housing types in Urban Neighborhoods. LU-33 encourages medium-density housing that diversifies housing options.	None		
294	Jessa Anderson-Reitz	Housing	Higher population densities will make it financially practical to add more numerous and frequent transit options, making it more practical for St. Paulites to live without a car.	N	We agree.	None		
295	Jessa Anderson-Reitz	Housing	Higher population density will enable more local businesses to flourish.	N	Comment acknowledged	None		
296	Jessa Anderson-Reitz	Housing	A St. Paul with more affordable housing options throughout the city will be less racially and socioeconomically segregated.	N	Comment acknowledged	None		

297	Jessa Anderson-Reitz	Housing	A St. Paul with more housing options will provide seniors with more options to age in place, and low wage workers with close proximity to high-wage jobs in the city.	N	Comment acknowledged	None		
298	Jessa Anderson-Reitz	Housing	For example: Policy H-48 should be strengthened, perhaps with one simple word: “Expand permitted housing types in *all* Urban Neighborhoods [that is, every neighborhood in St. Paul without exception] ... to include duplexes, triplexes, town homes, small-scale multifamily and accessory dwelling units.”	N	"Urban Neighborhoods" is a Future Land Use category in the Land Use chapter.	None		
299	Jessa Anderson-Reitz	Housing	Policies H-15, H-16, and H-17 are good, but they should be strengthened to require broad upzoning without parking minimums.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	None		
300	Jessa Anderson-Reitz	Housing	In H-47, the language “compatible with the pattern and scale of the neighborhood” should be deleted. This goal should never supersede the priorities of adding dense, affordable housing, and this language can only serve to block needed density.	Y	OK	Revise Policy H-47 to read as follows: Encourage high-quality urban design for residential development that is <u>sensitive to context</u> , but <u>also</u> allows for innovation and consideration of market needs.		Agree
301	Jessa Anderson-Reitz	Housing	I strongly support H-48.	N	Comment acknowledged	None		

302	Jessa Anderson-Reitz	Housing	In regards to Housing, p. 110: It is disingenuous to say that “the City does not have full control of housing development.” The city has banned everything but single family residential housing in 90% of the entire city, at the expense of people of color and low-wage workers. This document should recognize this history and explicitly call on the city to reverse course; and it should adopt a policy of allowing and encouraging abundant and affordable housing.	N	The City does not have full control of the entire housing market. Page 110 and Page 164 in Appendix A discuss affirmatively furthering fair housing.	None		
303	Kody Sherlund	Housing	This leads me to my second point: 2) Affordability must come with increasing demand to live in the city. Simply put, supply must keep up with demand, particularly with housing. The single most effective way the city can influence increasing the supply of housing is to change zoning laws (allow for duplexes, triplexes, townhomes, and the "missing middle" in general) and to promote infill without minimum parking requirements.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	None		
304	Scott Berger	Housing	I'm writing in favor of increased density throughout the great City of Saint Paul.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48).	None		

305	Scott Berger	Housing	I would like to see a plan at least as ambitious as Minneapolis's, where landowners have greater freedom to build multi-unit dwellings in traditionally single-family districts, and where increased housing--both affordable and market rate--permeates the city, leading to more neighbors and more diverse neighbors.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	None		
306	Scott Berger	Housing	I enjoy a single family house, but enjoy having many multi-family buildings nearby.	N	Comment acknowledged	None		

307	Jeff Zaayer	Housing	LU-6 calls for "growing Saint Paul's tax base in order to maintain and expand city service amenities and infrastructure" However policies such as LU1 and LU-6 seem to limit this growth by restricting high density development to certain isolated areas and valuing the preservation of "significant public views" over accommodating basic needs such as housing. I support growing our tax base and making room for everyone who wants to live in Saint Paul and I would like to see the comp plan enable this by allowing denser development across the city by allowing ADUs, duplexes, triplexes, and fourplexes citywide. We need to be bold in our policy implementation to ensure that we are growing the tax base without placing additional pressure on those who can't afford the rent increases caused by the housing scarcity that we are currently experiencing.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	None		
308	Jeff Zaayer	Housing	Policy LU-34 calls for "providing for multi family housing along arterial and collector streets to facilitate walking and leverage the use of public transportation" Given the public health impacts of exposure to particulate pollution caused by vehicles, as well as the effects of long term exposure to noise that interrupts sleep, I believe that multi family housing should not be exclusively promoted along busy corridors such as Marshall and Snelling Avenues. Because people of color and low income people as well as other underrepresented groups live in multi family housing at far higher rates than white and higher income people. Focusing multi family housing development near noisy, polluted roads while preserving quiet neighborhoods with clean air for those who can afford single family homes is a massive equity issue. I would like to see the comp plan provided for not only along arterial and collector streets but across the city. In addition to equity benefits, this would allow for the density needed to support walkability and high quality public transportation.	N	The Plan calls for higher density in or near Neighborhood Nodes. Not all Neighborhood Nodes are on arterial or collector streets. From a land use perspective it makes sense to locate higher density where it can support transit ridership. In turn, transit-oriented development can help create attractive walkable neighborhoods.	None		

309	Jeff Zaayer	Housing	Policy H-1 aims to maintain the housing stock by enforcing property maintenance codes. While it is important that all housing is safe and healthy for those who occupy it, I am concerned that without additional supporting policies this may create a disparate impact on people with low and fixed incomes. Language could be added about allocating funds for those who are unable to pay for property maintenance on their own. Or ensuring landlords pay for upkeep without transferring the burden to their tenants. Additionally tenants protections for landlords who fail to perform upkeep and maintenance would mitigate or help avoid and disparate impacts resulting from this policy.	Y	DSI has done a racial equity assessment of its enforcement process to ensure enforcement is not done in a way to disparately impact racial or ethnic groups. Complaint information is confidential. Policy H-26 calls for creating awareness around tenant and landlord right, responsibilities, best practices and resources to decrease conflicts that could lead to eviction.	Reorder the first few policies to make the ideas flow better. H-1, H-4, H-3, H-2, H-5...this groups the maintenance and enforcement policies, then goes into the code enforcement/TISH/health-safety policies.		No change necessary.
310	Jeff Zaayer	Housing	Policies H-12 and H-13 aim to improve the efficiency of new-build housing. This is important particularly given the climate crisis we currently face, but may not be inclusive of all approaches to reducing household energy consumption. Designing housing so that it can have cooling cross breezes on hot summer days, while it can also retain heat throughout the winter doesn't have to be done in some new and trendy way, people mastered this long before air conditioning and electricity became mainstream, and it may be more cost and energy efficient to consider these older technologies in addition to the new ones mentioned here.	N	Comment acknowledged	None		
311	Jeff Zaayer	Housing	Policies H-15, H 16 and H-17 aim to provide more housing and more diverse housing options. However the policies put forth n the land use chapter may limit the ability of developers and other people building housing to provide a wide range of housing types suiting various housing needs and preferences. Allowing for a diversity of housing throughout the city rather than isolating diverse housing at nodes and along busy corridors would significantly expand capacity for housing to meet the needs of all current and future residents.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	None		

312	Jeff Zaayer	Housing	Policy H-26 through H-30 all aim to achieve goal 5 "stable rental housing" . These would all be better supported by less restrictive residential zoning citywide. Allowing ADUs and multifamily units throughout the city would go a long way to increase the supply of rental properties and thus making rental housing more stable and enabling people to provide more housing at a lower cost than major apartment developments. This would similarly support Goal 6: "improved access to affordable housing" by allowing for more housing choice, transferring power from landlords to tenants by giving tenants choice and leverage regarding their living situation.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	None		
313	Andrea Jorissen	Housing	Energy efficiency in residential apartment buildings is hindered by the "Renter's Paradox". If an 8-unit building gets one electric bill split 8 ways evenly, there is little incentive to conserve. Additionally, the landlord is responsible to add the individual meters, LED bulbs, energy star appliances, solar panels, etc. for energy efficiency, yet the renter reaps the benefits. Need incentives for landlords to make upgrades.	N	Comment acknowledged. The Climate Action and Resiliency Plan may be a good place to address this issue.	None		
314	Cory Zwiefelhofer	Housing	1. Not clearly defining that the reduction in use of cars with respect to land use, transportation, and housing is one of the primary goals St. Paul needs to move to in 2040;	N	The Transportation chapter identifies the priorities for right-of-way design in this order: 1. pedestrians; 2. bicyclists; 3. transit users and 4. automobiles. The forthcoming Climate Action and Resiliency Plan will address automobile use as well.	None		
315	Cory Zwiefelhofer	Housing	4. Explicitly calling out removing existing parking lots in favor of establishing homes and businesses.	N	Comment acknowledged	None		

316	Cory Zwiefelhofer	Housing	5. Addressing the housing shortage by prioritizing the development of the "missing middle" types of housing (duplexes-fourplexes; small apartment complexes).	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	None		
-----	----------------------	---------	---	---	---	------	--	--

317	Jake Reuter	Housing	Saint Paul should follow the lead of Minneapolis and eliminate single-family exclusive zoning. Triplexes should be allowable anywhere in our city.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	None		
-----	-------------	---------	--	---	---	------	--	--

					The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.			
318	Philip Bussey	Housing	I think this comprehensive plan should recognize the negative impact that exclusively zoning for single family homes has done to our city and allow for multi family dwellings throughout the entire city, increase where mixed-use buildings are allowed, and remove parking minimums.	N		None		
319	KL	Housing	I support the following additions to the city’s plan: 1) creative policies to stop the negative impacts of gentrification on residents and small businesses such as limits on how much rent can increase to protect affordable housing and commercial spaces for businesses (such as New York City’s rent control	N	Policy LU-4 in the Land Use chapter addresses support for investments that minimize displacement in neighborhoods feeling development pressure. Also, H-40 states, “Prioritize preservation of income-restricted and naturally-occurring affordable housing in areas with improved/improving transit and/or planned reinvestment to reduce resident displacement.”	None		
320	Kathryn Noble	Housing	The departure of businesses from Downtown is also a key area of concern and the city needs to do a lot more to spur business/residential development in the downtown core.	N	Comment acknowledged.	None		

321	Michael Healy	Housing	It doesn't seem reasonable to talk about wanting development and housing to be "affordable" but then turn around and impose unnecessary mandates that drive up development costs and make everything less affordable. Developers are going to build parking if their project needs parking.	N	PED staff are currently working on a city-wide parking study that will explore the elimination of parking minimums.	None		
322	Vicky Adams	Housing	Living on the east side of St Paul for 14 years and have worked downtown I'm leery of the plan to increase density with no regards to single family home owners like myself and those of my neighbors.	N	Comment acknowledged	None		
323	Vicky Adams	Housing	We already have many rental units both duplexes and triplexes and it hasn't been good with more crime and more traffic and rental costs have not been lowered or stable.	N	Comment acknowledged	None		
324	Vicky Adams	Housing	Now with our property taxes going up its pushing more of us out for services we get are truly less than what we are paying for!	N	Comment acknowledged	None		
325	Vicky Adams	Housing	We have much diversity already with working class folks who will see no upside to just jamming more people in already extremely close proximity to one another!	N	Comment acknowledged	None		
326	Vicky Adams	Housing	The city needs more input from its homeowners and have meetings that are when we can actually attend!	N	Comment acknowledged	None		
327	Kristina Kliber	Housing	How does the proposed plan impact the current Student Housing Overlay District that was enacted in 2012? Specifically, what is included in the 2040 Comprehensive Plan to prevent absentee-landlord owned single-family student rental homes from being converted into duplexes and triplexes? Increasing the number of college students living in an already densely populated part of Saint Paul will lead to a tipping point where college students outnumber other renters and homeowners leading to a vastly different quality of life.	N	The draft Plan does not change the Student Housing Overlay District. Policy H-53 addresses efforts to reduce conflicts between students and long-term residents.	None		
328	Kai Peterson	Housing	Policy H-48 is particularly important as a way to improve density in all neighborhoods and make housing more affordable. H-48 should be re-worded to make it more specific by adding the word 'all' so it reads "Expand permitted housing types in all Urban Neighborhoods..." This change will remove ambiguity.	N	"Urban Neighborhoods" is a Future Land Use category in the Land Use chapter.	None		
329	Kai Peterson	Housing	Affordable housing is rightly a major focus in the draft comprehensive plan.	N	Comment acknowledged	None		
330	Kai Peterson	Housing	However, the draft plan is silent on who should benefit from affordable housing, and neighborhood-level diversity could be advanced by being more specific.	N	Policy H-16 addresses housing choice and diversity. Appendix A discusses cost-burdened households. Appendix B includes the Housing Need Implementation Strategy, which goes into additional detail.	None		
331	Kai Peterson	Housing	The comprehensive plan should add a policy goal in the housing chapter making development projects differentiate between affordable housing to be designated for seniors and those oriented towards families.	N	We welcome any and all plans for additional affordable housing whether for seniors or families, given the great need. A policy distinguishing between the two is not needed.	None		

332	Kai Peterson	Housing	Affordable housing is important for both seniors and families, but the needs of those populations differ, and diverse neighborhoods and housing choices can be better achieved by differentiating between them for reporting and planning purposes.	N	We welcome any and all plans for additional affordable housing whether for seniors or families given the great need. A policy distinguishing between the two is not needed. Staff may gather information and differentiate senior and family units based on affordable housing production, but this does not need to be a policy of the Comprehensive Plan.	None		
333	Kai Peterson	Housing	Requiring projects to report separately on affordable housing units designated for seniors and those designated for families will increase transparency, drive policy goals H-15, H-16, and H-17, and align with HUD's guidance on affirmatively furthering fair housing. Without this change, developments in predominantly white neighborhoods are more likely to fulfill their affordable housing goals by creating only senior-oriented housing.	N	Staff may gather information and differentiate senior and family units based on affordable housing production, but this does not need to be a policy of the Comprehensive Plan. Senior housing is happening all over the City, not just in white neighborhoods.	None		
334	Keith Koch	Housing	I understand that more density and population are needed to help our city's economy, reduce greenhouse emissions and leverage infrastructure; but I also believe that a balanced approach that respects the integrity of existing home-owners, neighborhood character and scale are important to consider in the plan.	N	Comment acknowledged	None		
335	Keith Koch	Housing	In my opinion, examples of where the city has lost sight of the balance are the re-zoning of Marshall Avenue and the consideration of removing the student-housing overlay around St. Thomas campus. Both of these situations will have an irreparable impact on existing neighborhoods and the home-owners in those areas, it will be years before we understand the development to come and the consequences of the changes allowed in those areas.	N	Comment acknowledged	None		
336	Tom Basgen	Housing	We should be investing in Public affordable housing and we should be building it in parts of the city where it typically hasn't been located.	N	The Saint Paul Public Housing Agency is responsible for providing the affordable public housing in Saint Paul.	None		

337	John Slade	Housing	H1 – add Code enforcement will be done in such a way as to not disparately impact racial or ethnic groups. Protection of tenants who trigger enforcement from retaliation will be a top priority.	N	DSI has done a racial equity assessment of its enforcement process to ensure enforcement is not done in a way to disparately impact racial or ethnic groups. Complaint information is confidential. Policy H-26 calls for creating awareness around tenant and landlord rights, responsibilities, best practices and resources to decrease conflicts that could lead to eviction.	None		
338	John Slade	Housing	H16 – Promotion of housing choice among diverse income levels will not be used to upscale units in poor neighborhoods.	N	Comment acknowledged	None		
339	John Slade	Housing	H19 – needs some mention specifically of racial disparity and the history of unfair housing practices (as per H20)	N	The boxed comments on page 110 go into great detail about the Analysis of Impediments and steps to affirmatively further fair housing.	None		
340	John Slade	Housing	H22 – Any promotion of housing ownership will be done with a racial justice lens and with an eye to remedy of historic housing discrimination.	Y	Page 30 of the Land Use chapter discusses applying the Metropolitan Council’s Areas of Racially Concentrated Poverty to Saint Paul. Page 110 and Page 164 in Appendix A discuss affirmatively furthering fair housing.	A reference to racial justice will be added to the introduction of the Housing Chapter.		Amend H-20 to read: Collaborate with partner agencies, lenders and the real estate industry to reduce racial disparities in homeownership that could be attributed to unequal access to fair lending, or intentional steering to specific neighborhoods <u>or</u> historic housing discrimination.
341	John Slade	Housing	H26 – Add We are aware that tenant rights need additional support and will work to increase them.	Y	OK	Revise Policy H-26 by replacing the word “Create” awareness with the word “ <u>Increase.</u> ”		Agree
342	John Slade	Housing	H26 – Add The City will engage in fair housing testing to determine the depth of racial, gender, or cultural bias in the rental and ownership housing.	N	As a CDBG entitlement jurisdiction, the City is a committee member and funding partner of the Fair Housing Implementation Council (“FHIC”), a metro-wide regional fair housing committee for Twin Cities area.	None		

343	John Slade	Housing	H32 – The city’s target for new rental construction affordability will be determined by our Met Council affordability goals. Given 830 units at 30% AMI, 130 units at 50% AMI and 1010 units at 60% AMI, our goals will be 25% at 30% AMI, 5% at 50% AMI and 15% at 60% AMI (100% of the 30% goal and 50% of the 50% and 60% goals)	N	The City has met the goals set by the Metropolitan Council each year, and often exceeds these goals. The goals in this policy are based on a strong foundation of what is attainable with existing resources. Page 136 of Appendix A addresses production and preservation of affordable housing units.	None		
344	John Slade	Housing	H33 – the City’s target for new ownership will be determined by Met Council affordability goals. Given approximately 130 units at 50% AMI and 1010 units at 60% AMI, our goals will be 5% at 50% AMI and 15% at 60% AMI (1/2 of the goals at 50% and 60%)	N	The City has met the goals set by the Metropolitan Council each year, and consistently exceeds these goals. The goals in this policy are based on a strong foundation of what is attainable with existing resources.	None		
345	John Slade	Housing	H41 – “move forward with using official controls” – not “consider use of”	N	This is an item more appropriate for consideration as part of a work program than high-level policy to be set by the Comprehensive Plan. The City Council has already asked City staff to explore official controls to require affordable housing to achieve mixed-income neighborhoods, and to report back to the Council by the end of 2019.	None		
346	John Slade	Housing	H44 – “Make achieving the Met Council Affordable Housing goals a top priority both in planning, legislative priorities, and comprehensive plan language.”	Y	OK	Revise H-44 to read: “ Strive to achieve <u>Make achieving</u> the Metropolitan Council’s affordable housing goals <u>a top priority both in planning and legislative efforts.</u> ”		Agree

347	Jake Reilly	Housing	<p>3. Yesterday MPR did a piece on the Principal of Maxfield Elementary School and his struggles to help families in his school struggling with homelessness. Last week Councilmember Jalali Nelson rode the train with the folks experiencing homelessness on our Transit system. Clearly there’s a desire in Saint Paul to eliminate homelessness. Therefore I ask the Planning Commission to go back to the drawing board on Housing, first by considering a Housing First policy to start moving all of those that live here in Saint Paul whether on the street or in a train or a car or a shelter in to a place to call home. This will likely involve partnerships with developers, Ramsey County, mental health agencies, Metro Transit, and many others. Additionally, the commission should specifically examine Policy H-32. I encourage you to look at developing a more meaningful and aspirational policy by reexamining the utility of dividing up the affordability level by 10/10/10. Clinging to that concept ignores markets. It ignores how the City’s affordable housing allocation as set by the Metropolitan Council is structured. A commitment to 30% of all HRA funded projects being affordable is commendable, even laudable. But the 10/10/10 requirement is arbitrary. Minneapolis made the news with their residential zoning district policy direction. Saint Paul could also make headlines as the first large city with a real Housing First policy, taken from a real-estate development standpoint. Saint Paul could also make headlines by maintaining the 30 percent affordability requirement for all HRA-funded projects. We could have more mixed-income/mixed-use projects like 2700 University built all over the city, if that policy was revised.</p>	N	<p>No change to the 10/10/10 policy is planned. It is a considered and deliberate policy that has been in place for more than a decade. The project at 2700 University Avenue was not an efficient financing model and would be very difficult to replicate based on the complexity of the financing.</p>	None		
-----	-------------	---------	---	---	---	------	--	--

348	Alicia Valenti	Housing	<p>Policy LU-34 calls for “[providing] for multi-family housing along arterial and collector streets to facilitate walking and leverage the use of public transportation.” Given the public health impacts of exposure to particulate pollution caused by cars, as well as the effects of long-term exposure to noise that interrupts sleep, I believe that multi-family housing should not be exclusively promoted along busy corridors such as Marshall and Snelling avenues. Because people of color, people with low incomes and other traditionally underrepresented groups live in multi-family housing at far higher rates than white people and people with high incomes, focusing multi-family housing development near noisy, polluted roads while preserving quiet neighborhoods with clean air for those who can afford single-family homes is a massive equity issue. I would like to see the comp plan provided for not only along arterial and collector streets, but across the city. In addition to equity benefits, this would allow for the density needed to support walk-ability and high-quality public transportation.</p>	N	<p>Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter. The Plan calls for higher density in or near Neighborhood Nodes. Not all Neighborhood Nodes are on arterial or collector streets. From a land use perspective, it makes sense to locate higher density where it can support transit ridership. In turn, transit-oriented development can help</p>	None		
349	Alicia Valenti	Housing	<p>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.</p>	N	<p>DSI has done a racial equity assessment of its enforcement process to ensure enforcement is not done in a way to disparately impact racial or ethnic groups. Complaint information is confidential. Policy H-26 calls for creating awareness around tenant and landlord rights, responsibilities, best practices and resources to decrease conflicts that could lead to eviction.</p>	None		

350	Alicia Valenti	Housing	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.	N	Comment acknowledged	None		
351	Alicia Valenti	Housing	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.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	None		
352	Alicia Valenti	Housing	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.	N	Policy H-48 calls for expanding permitted housing types in Urban Neighborhoods. LU-33 encourages medium-density housing that diversifies housing options.	None		

353	Alicia Valenti	Housing	Policy H-48 calls for permitting “duplexes, triplexes, townhomes, small-scale multi-family and accessory dwelling units” in Urban Neighborhoods. This would be a huge step forward for allowing increased density citywide and opening all of our neighborhoods to more neighbors and I strongly support it.	N	Comment acknowledged	None		
354	Stuart and Mary Ellen Knappermiller	Housing	How I will heat my home in a decade or less. I can't buy a more efficient furnace than we have. What's our plan? We use 4 ceiling fans when we are in a room that needs cooling. We've spent months in SE Asia and South America so we know we can live with our central air off all summer. We have solar on our roof for electricity.	N	Comment acknowledged	None		
355	Stuart and Mary Ellen Knappermiller	Housing	We need affordable housing and an increase in density and better transit.	N	Comment acknowledged	None		
356	Stuart and Mary Ellen Knappermiller	Housing	We need to connect as citizens to make our parks and water and homes and businesses places of vibrancy, especially because our daughter in law says she fits in better walking at Phalen than her Euro-American in laws do.	N	Comment acknowledged	None		
357	Michael Sonn	Housing	We should be talking about major investments in housing and bike/walk focused transportation.	N	The 2040 Comprehensive Plan supports that.	None		
358	Michael Sonn	Housing	There should be a blanket tri-plex allowance anywhere in the city, no matter the zoning.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	None		

359	Michael Sonn	Housing	<ul style="list-style-type: none">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.	N	DSI has done a racial equity assessment of its enforcement process to ensure enforcement is not done in a way to disparately impact racial or ethnic groups. Complaint information is confidential. Policy H-26 calls for creating awareness around tenant and landlord rights, responsibilities, best practices and resources to decrease conflicts that could lead to eviction.	None		
360	Michael Sonn	Housing	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.	N	Comment acknowledged	None		
361	Michael Sonn	Housing	<ul style="list-style-type: none">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.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	None		

362	Michael Sonn	Housing	<ul style="list-style-type: none"> 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. 	N	Policy H-48 calls for expanding permitted housing types in Urban Neighborhoods. LU-33 encourages medium-density housing that diversifies housing options.	None		
363	Peter Berglund	Housing	In support of 2040 Comp Plan Transportation Goal No. 4 to shift away from single-occupant vehicles: (Limit parking and you limit cars) If new development brings more housing but doesn't limit the number of new cars, we're going to have more serious traffic congestion. As I understand the city's policies, a new apartment building must provide a minimum of off-street parking spaces. While increased density is good for mass transit, if more density brings more cars, the buses won't be able to function on streets choked with cars. Some say put the new multifamily housing at major intersections to better connect with transit. However, new apartment buildings may result in the same number of cars regardless of their location.	N	Comment acknowledged	None		
364	Peter Berglund	Housing	My proposal is to eliminate the city's minimum off-street parking requirement for new multifamily housing and replace it with a maximum off-street parking requirement. Residents living in the new multifamily housing would not get permits to park on the street, of there would be only a limited number of permits issued. Existing area residents would be granted parking permits. Permit parking program costs could be paid for with fines for violators. And if the city is making so much more in property taxes, this would help offset the administration of a permit parking program.	N	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	None		
365	Peter Berglund	Housing	Senior citizens, college students and many young adults are happy to live without cars, so there should be a market for such housing. We've been told at a meeting on the Ford site that it can cost \$10,000 or more for each parking stall within a multifamily apartment building. If the developers can reduce the number of parking stalls, these savings could be passed on to the new tenants.	N	Comment acknowledged	None		
366	Payne-Phalen Community Council	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?	Y	The column shows the percentage of units within each AMI percentage category that are affordable. The total number of affordable units varies for each AMI category where n= the number affordable units in each AMI category.	Add the following label below the 100% to 0% column: “% affordable units”		Agree

367	Payne-Phalen Community Council	Housing	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	Y		Change the text on page 144 from Map 7 to Map 8.		Agree
368	Payne-Phalen Community Council	Housing	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)?	Y		Edit the label on Chart 23 by adding “(Renter)” and revise the years on the legend for the blue category from 2010-2014 to 2005-2009 in three separate places.		Agree
369	Payne-Phalen Community Council	Housing	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)?	Y		Edit the legend on page 159 by revising the years on the legend for the blue category from 2010-2014 to 2005-2009 in three separate places.		Agree
370	Payne-Phalen Community Council	Housing	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’.	N	Comment acknowledged	None		
371	Payne-Phalen Community Council	Housing	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.	Y		Revise the table on page 171 in Appendix B to remove reference to an Emergency Housing Plan under the “Plans/Official Controls/Programs” heading. It is already covered under "Regulations/Agreements/Plans."		Agree
372	Pat Thompson	Housing	Minnesota is going to be a new home for climate refugees and internally displaced people from the U.S. More housing everywhere regardless of entrenched interest who want nothing to change.	N	Comment acknowledged	None		
373	Michael Russell	Housing	Let’s not just have affordable rents, let’s have affordable ownership throughout the city.	N	We agree, and the Plan supports it.	None		

374	Heritage Preservation Commission	HP	The Heritage Preservation Commission Executive Committee was concerned after reviewing the comments of the Comprehensive and Neighborhood Planning Committee of the Planning Commission and the subsequent denial recommendation for the local heritage site designation of Saint Andrew's Church at 1031-1051 Como Avenue. Comprehensive and Neighborhood Planning Committee members based their recommendation on statements made that heritage preservation was not a listed core value in the Comprehensive Plan of the City of Saint Paul, when in fact the current and proposed Comprehensive Plan have dedicated chapters to heritage preservation. To avoid future confusion, on behalf of the Heritage Preservation Commission we request that a statement be added to the 'Vision and Core City Values' section of the 2040 Comprehensive Plan for the City of Saint Paul: "Respecting Our History and Culture - we are a city that believes that the preservation of buildings, sites and other objects having a historical or cultural value which contributes to the uniqueness of Saint Paul is a public necessity and is required in the interest of the welfare of the people of Saint Paul."	Y	OK	Add a Core City Value: <u>Respecting Our History and Culture - we are a City that believes that the preservation of buildings, sites and other objects with historical or cultural value contributes to the uniqueness of Saint Paul, is a public necessity and is required in the interest of the welfare of the people of Saint Paul.</u>	12	Agree
375	James Slegers	HP	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.	N	Nodes were spaced to be generally no more than a 20-minute walk from any residence.	no change		
376	SS	HP	A section dealing with conflict is also missing. What about when there are competing stated goals within the comp plan? What about when there is a controversy? Town and gown issues, or historic designation against the will of the property owners, the desires of a group of neighbors to preserve their neighborhood's character of small homes versus the need to provide quality affordable housing? General guidelines for making decisions when there are competing sections within the comp plan would be helpful.	N	None recommended. It would be very difficult to anticipate all of the ways and situations in which goals might "compete" with one another. Establishing priority of goals is essentially a political calculation.	None		
377	Rick Varco	HP	The world belongs to the living. These areas must be dramatically scaled back. There should be a fixed and limited number of building and parcels so designated. Adding one site should require the removal of another.	N	Only 2.6% of total parcels in Saint Paul are designated historic.	None		
378	Saint Anthony Park Community Council (SAP)	HP	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.	N	Public art is not in the purview of the HPC-unless it is designated as historic.	None		

379	Saint Anthony Park Community Council (SAP)	HP	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.	N	Comment acknowledged.	None		
380	Saint Anthony Park Community Council (SAP)	HP	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.	N	Comment acknowledged	None		
381	Saint Anthony Park Community Council (SAP)	HP	Note that in the sidebar “Definitions” on p.205, The term Reconstruction should be highlighted and made a separate paragraph.	Y	Agree	Highlight/bold "Reconstruction" and start a new paragraph.		Agree
382	Tom Darling	HP	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.	N	Summit Avenue is a local, state and national historic district and has protections in place to preserve its character. The Comprehensive Plan does not provide guidance on whether an organization should be designated as a district council.	None		
383	Shannon O'Toole	HP	The historic and cultural preservation section ignores the city's historic areas west of downtown. I would expect to see goals that preserve those historic areas as well as the affordable housing that is there, and there is little or none of that.	N	The HP goals cover all of Saint Paul.	None		
384	Payne-Phalen Community Council	HP	56. We reviewed the draft of the Heritage Preservation Chapter that was posted before the November 2nd draft. That version was very strong in the overall intent for integrating preservation consciousness and practice into the city’s development framework. Big kudos!	N	Comment acknowledged	None		

385	Payne-Phalen Community Council	HP	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.	N	Because of staffing considerations and cost, a city-wide survey is not cost effective or practical. We will continue to survey neighborhoods or specific historic contexts annually.	None		
386	Payne-Phalen Community Council	HP	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.	Y	This has been under consideration at various times by City staff, the HPC and City Council members. It would require amending, by ordinance, Chapter 73 of the City's Legislative Code.	Revision of Chapter 73 should be added to Figure I-6 in the Implementation Chapter.	223	Agree
387	Saint Paul Parks and Recreation Commission	Implementation	How do we uphold the plan and accountability?	Y	An annual Planning Commission evaluation is one potential step, along with Parks Commission and neighborhood groups or individuals holding the City accountable.	Add a bullet to p 216 under General Implementation: " <u>work with the Planning Commission to prepare an annual evaluation of implementation progress, involving other City departments and commissions as appropriate;</u> "	216	Agree
388	SS	Implementation	A section dealing with conflict is also missing. What about when there are competing stated goals within the comp plan? What about when there is a controversy? Town and gown issues, or historic designation against the will of the property owners, the desires of a group of neighbors to preserve their neighborhood's character of small homes versus the need to provide quality affordable housing? General guidelines for making decisions when there are competing sections within the comp plan would be helpful.	N	Rather than ranking issues, we have been very intentional about action language and wording the policies so that they can help decision makers navigate such conflicts. Because how we deal with conflict will vary depending on the issue, a "conflict section" (more likely in the Intro than in Implementation) would not be very informative.	None		
389	Kathleen Kelso	Implementation	We face urgent conditions that demand a change from the status quo in the way we lead by design of our City Plan and engage people of all ages to implement this Plan. The ACOA is eager to assist in the implementation process.	N	Comment acknowledged	None		
390	Kathleen Kelso	Implementation	We are confident the implemented Comprehensive Plan will become regionally and nationally recognized for its intentional work and results in creating an intergenerational city that embraces aging in community.	N	Thanks - that would be cool!	None		
391	Bob Morrison	Implementation	Once approved, what process has been established to monitor and measure whether or not assumptions made remain realistic and relevant, and for identifying and rectifying any unintended consequences as a result of actions taken as the City implements the 2040 Comprehensive Plan?	Y	The Planning Commission will work with staff to create a process to monitor implementation and measure progress towards reaching our goals. evaluation is one potential step, along with neighborhood groups or individuals holding the City accountable.	Add a bullet to p 216 under General Implementation: " <u>work with the Planning Commission to prepare an annual evaluation of implementation progress, involving other City departments and commissions as appropriate;</u> "	216	Agree

392	Zack Mensinger	Implementation	Lastly, much of the language in the 2040 could be clarified or strengthened. For instance, there are many places where things are to be "encouraged" and "supported": this language should be strengthened in order to actually enact these policies.	N	Specific examples would be helpful. We've been intentional about using the sharpest language practical, and have spent much time debating the proper action words throughout the plan. In some cases, "softer" verbs are used because the City does not have control over the suggested policy or action.	None		
393	Center for Economic Inclusion	Implementation	Re: Evaluation - Saint Paul for All includes several specific policies that include the use of an equity lens. The Center encourages the City to broaden the application of an equity lens to the implementation and evaluation of all city programs and decisions.	N	The City has four equity goals, which will guide how the City integrates equity and inclusion into our work: 1) equity in our workforce; 2) equity in supplier diversity and contracting; 3) equity in the design of our services and programs; and 4) equity in our community engagement efforts. The Mayor has appointed a Chief Equity Officer to carry out the City's commitment to build an equitable and inclusive city that will shift culture in City processes and policies,, eliminate structural inequities; and ensure timely and relevant access to services, resources, support and opportunity to every person in Saint Paul.	None		
394	Center for Economic Inclusion	Implementation	The Center also encourages the City to provide more detail in the implementation section of the plan, especially regarding the policies that seek to advance economic inclusion. The introduction to the implementation chapter includes the following among ten “general implementation” actions: “implement and regularly update the City’s Racial Equity Plan to realize and measure equity-related goals and policies.” Also, the land use chapter implementation table includes “Implement Economic Development Strategy.” How do the racial equity plan and economic development strategy work together to implement comprehensive plan policies? Where do their goals, strategies and measures overlap and diverge? Given the reality of limited resources, what among these plans and strategies will be prioritized in the near term?	N	All good questions, but too detailed for the Comp Plan to say how its implementation actions will play out.	None		

395	Center for Economic Inclusion	Implementation	The City of Saint Paul has demonstrated a clear and compelling commitment to racial equity, and a platform for accelerating equitable growth. We applaud this plan for its articulation of racial equity goals and policies, and linkages to the resources needed to fulfill those goals. By providing a more detailed implementation section, the City can better articulate how the equity goals and policies in the plan will advance measurable changes in toward economic inclusion in Saint Paul.	N	Comment acknowledged	None		
396	Saint Anthony Park Community Council (SAP)	Implementation	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.	N	Comment acknowledged	None		
397	Saint Anthony Park Community Council (SAP)	Implementation	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.	N	Freeway lids should be considered wherever practical. No need to list all potential locations in the plan.	None		
398	Saint Anthony Park Community Council (SAP)	Implementation	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.	N	Noted. Will pass on to relevant planners.	None		
399	Saint Anthony Park Community Council (SAP)	Implementation	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.	N	Noted	None		
400	Saint Anthony Park Community Council (SAP)	Implementation	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.	N	Comment acknowledged.	None		

401	Saint Anthony Park Community Council (SAP)	Implementation	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.	N	Comment acknowledged.	None		
402	Saint Anthony Park Community Council (SAP)	Implementation	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.	N	Medium-term is more realistic for this action.	None		
403	Saint Anthony Park Community Council (SAP)	Implementation	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.	N	We aren't calling out individual bike projects in the Implementation Chapter. Falls under "Use the Bicycle Plan...to guide implementation of the bicycle network..."	None		
404	Creative Enterprise Zone	Implementation	Items 17 and 18 in Figure I-1 of the Implementation Chapter in the Comprehensive Plan call for studies over a 5-10 year period, but we urge Saint Paul to consider a more expedient timeline.	N	Medium-term is more realistic for these actions.	None		
405	Housing Justice Center	Implementation	Overall the plan includes a long list of strategies, including some that have the potential to address some of the most important housing issues faced by the city, but many of these policies are not tied to specific strategies or implementation plans that would make the proposed policies meaningful. For example, while it is good to know that there are continuing discussions about the preservation of unsubsidized affordable housing, the comprehensive plan should do more than vaguely reference that there might be a plan at some future point in time.	N	Comment acknowledged	None		
406	Towerside Innovation District	Implementation	Items 17 and 18 in Figure I-1 of the Implementation Chapter in the Comprehensive Plan call for studies somewhat along these lines over a 5-10 year period, but we urge Saint Paul to consider a more expedient timeline. Market demand for standard development projects grows more and more each day and the vast majority of these projects do not help move the needle on the City of Saint Paul's core values.	N	Medium-term is more realistic for these actions.	None		
407	Towerside Innovation District	Implementation	We are also pleased to provide Towerside Planning and implementation Framework-Version 2.0 as a supporting document to our recommendation. The purpose of this document is to establish a shared framework for the Towerside Innovation District that is consistent with the goals and plans for the Saint Anthony Park neighborhood in Saint Paul, the Prospect Park neighborhood in Minneapolis, and the University of Minnesota. This planning framework is the culmination of significant community effort over the last year and a half. One crucial application of the framework is to inform the 2040 Comprehensive Plans for the Cities of Saint Paul and Minneapolis.	N	Comment acknowledged.	None		

408	Towerside Innovation District	Implementation	The Planning and Implementation Framework-Version 2.0 identifies the key regulatory changes, plans, and infrastructure projects needed to achieve the Towerside vision with all of its economic, environmental and social benefits. It also addresses what the cities and other implementing agencies need to do to help realize this shared vision between funding, regulatory changes, capital project prioritization, and economic development support.	N	Comment acknowledged.	None		
409	Jeff Zaayer	Implementation	We need to be bold in our policy implementation to ensure that we are growing the tax base without placing additional pressure on those who can't afford the rent increases caused by the housing scarcity that we are currently experiencing.	N	Comment acknowledged.	None		
410	Andrew Singer	Implementation	We also need data to evaluate how effective our engineering measures have been. On Marshall, for example, bike and pedestrian crashes have actually risen somewhat since we rebuilt the street with medians and bike lanes. Is this due to increased bike and pedestrian usage rates or a flaw in our design? Since we don't have count data longer than half a year before project implementation (and only for a few spots), we have no idea whether our infrastructure spending improved safety or made it worse.	Y	Noted	Add to Figure I-2 as an on-going item: <u>"Improve pedestrian and bicyclist mode share and crash data to inform and evaluate investments."</u>		Agree
411	Payne-Phalen Community Council	Implementation	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.	N	Because of staffing considerations and cost, a city-wide survey is not cost effective or practical. We will continue to survey neighborhoods or specific historic contexts annually.	None		
412	Payne-Phalen Community Council	Implementation	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.	Y	This has been under consideration at various times by City staff, the HPC and City Council members. It would require amending, by ordinance, Chapter 73 of the City's Legislative Code.	Add the following to Figure I-6 in the Implementation Chapter: <u>Explore the Heritage Preservation Commission's authority and process regarding demolition permits as part of any revisions to Chapter 73.</u>	223	Agree
413	District 1 Land Use Committee	Introduction	pg. 9: We appreciate the deliberate engagement to reach all communities in Saint Paul and for including the results on that engagement by race.	N	Comment acknowledged	None		
414	Rick Varco	Introduction	In regards to the themes laid out on page 10, the city should give much more weight objective, universal values like the affordability of housing and access to jobs as compared to subjective, personal values like "sense of community". People without affordable housing options have no choice, while people who object to their "neighborhood's character" can move. In particular, irrational fears about "public safety" should not be allowed to block additional multi-unit housing with diverse residents.	N	Comment acknowledged	None		
415	Rick Varco	Introduction	First, the draft should clarify that these values apply with equal weight to both current and potential future residents. Especially when evaluating increased density, we must consider the benefits to those who will have a chance to live in the new construction. What happens to people if we don't allow enough housing to be built to accommodate them?	N	Comment acknowledged	None		

416	Rick Varco	Introduction	While I support identifying “health” as a goal, I worry this may reflect old myths about the dangers of taller buildings. The draft should explicitly recognize that dense walkable cities are inherently healthier both individually and collectively than single-family zoning. There are no health advantages to single family neighborhoods.	N	Staff has not seen research supporting the claim that "there are no health advantages to single-family neighborhoods." The 2040 Comprehensive Plan supports housing choice, which includes a broad range of housing types, from single-family homes to accessory dwelling units to multi-unit residential buildings.	None		
417	Rick Varco	Introduction	While, I support “Growth and Prosperity through Density”, the draft should delete the references to “well-designed” and “neighborhood context”. These are unnecessary qualifiers that will prevent construction of needed housing. They reflect personal aesthetic views and are not a proper subject of public policy.	N	Staff does not agree. Good design is a matter of public policy. Neighborhood context is one consideration in determining the location, amount and scale of new development. The idea of "responding" to neighborhood context does not mean that increases in density do not occur.	None		
418	David Sullivan-Nightengale	Introduction	Page 8 - Autonomous vehicles. We cannot allow our pedestrians, cyclists, and other users of our streets to be test subjects for autonomous vehicle manufacturers. The majority of autonomous vehicles being tested are actually heavier and larger than existing vehicles due to the need to carry multiple additional sensors. Very few are small electric vehicles that are not crashworthy. There is currently no consensus standard for the safety certification of these vehicles that either NHTSA or the State of Minnesota requires for safety on our roads. The majority of these vehicles are tested in dry environments where snow rarely accumulates today. Don't allow these on our busy streets until the industry can make a safety case. As someone who has worked within this industry specifically in the area of system safety, it is a long way off from doing that.	N	Comment acknowledged.	None		
419	Center for Economic Inclusion	Introduction	Re: data - The Center supports the disaggregation of data by race in the plan. For example, in the Introduction (page 7), the plan outlines some of the disparities based on race: “Saint Paul residents are experiencing significant gaps in education, income, employment and home ownership. In 2014, 52% of whites age 25 and older had a bachelor’s degree or higher, while only 19% of people of color were in this category. While labor participation is nearly equal between whites and people of color (72% and 68% respectively), the per capita income for whites in 2014 was three times that of people of color (\$39,344 vs \$13,856). In 2014, there was a 33% gap in homeownership between white residents and people of color (61% vs 28%, respectively).”	N	Comment acknowledged	None		

420	Center for Economic Inclusion	Introduction	Re: data - The Center encourages the City to build upon the ACP50 analysis with a more in-depth analysis that disaggregates data by race city-wide (and by smaller geography, as needed). While the Introduction cites the homeownership gap between whites and People of Color (POC), the Center encourages the City to break down the broad category of POC into more specific racial categories, as the data allows. One place to start would be to disaggregate the data mapped in Appendix A to the Introduction by race, such as poverty and homeownership (similar to how the housing chapter breaks down housing cost burden and homelessness by race).	N	Comment acknowledged	None		
421	Saint Anthony Park Community Council (SAP)	Introduction	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.	N	Comment acknowledged.	None		
422	Saint Anthony Park Community Council (SAP)	Introduction	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.	N	Agree with these more detailed aspects of climate change, but this paragraph is intended to speak to the broader physical characteristics of the city and how their design, location and management have an impact on climate change. The specifics mentioned in the comment are better addressed in the "Climate Adaptation and Resilience Plan," currently being prepared by the Mayor's Office.	None		
423	Saint Anthony Park Community Council (SAP)	Introduction	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.	N	"Well-designed" goes beyond the characteristics stated later in the paragraph. It means that infill development has an active first floor that relates to pedestrians on the sidewalk, manages traffic and circulation safely, and provides an attractive public realm.	None		
424	Karen Allen	Introduction	<ul style="list-style-type: none"> 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. 	N	Not sure what "proposed new zoning rules" the respondent is referring to. We won't be able to respond to this until we get the zoning studies underway once the Comp Plan is adopted.	None.		
425	Karen Allen	Introduction	<ul style="list-style-type: none"> 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. 	N	Comment acknowledged.	None.		

426	Karen Allen	Introduction	<ul style="list-style-type: none"> • 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. 	N	Comment acknowledged.	None.		
427	Karen Allen	Introduction	(Re: Nine themes)• 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.	N	Comment acknowledged.	None.		
428	Karen Allen	Introduction	(Re: Vision and Core City Values)• 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?	N	Comment acknowledged.	None.		
429	Karen Allen	Introduction	(Re: Vision and Core City Values)• 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.	N	Comment acknowledged. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	None.		
430	Karen Allen	Introduction	(Re: Vision and Core City Values)• 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.	N	Staff does not believe that there are no health advantages to single-family neighborhoods. The commenter presumes that transit, sidewalks, trails and other elements that facilitate walking are not present in single-family neighborhoods. This is simply not the case in Saint Paul.	None		
431	Payne-Phalen Community Council	Introduction	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!	N	Thanks!	None		
432	Payne-Phalen Community Council	Introduction	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.	N	Comment acknowledged	None		

433	Payne-Phalen Community Council	Introduction	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 if 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.	Y	The Focus Areas are intended to be foundational to the document. They are mentioned in the first paragraph of the introduction on p. 6, and are called "overarching issues." Perhaps adding a sentence or two about why staff decided to integrate these ideas into every chapter, rather than create individual chapters for each of them, will help raise their visibility.	Change the phrase "overarching issues" to " <u>focus areas</u> " in the first paragraph on p. 6. Add the following sentence in front of the last sentence of the first paragraph on p. 6: <u>These focus areas are foundational to the City's policies in every chapter of the Comprehensive Plan.</u>		Agree
434	Payne-Phalen Community Council	Introduction	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.	N	Comment acknowledged.	None		
435	Payne-Phalen Community Council	Introduction	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:	N	Comment acknowledged	None		
436	Payne-Phalen Community Council	Introduction	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.	N	Comment acknowledged	None		
437	Payne-Phalen Community Council	Introduction	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.	Y	Agree, but use the phrase "community wealth creation" to speak to broader efforts towards community-based economic development.	Add " community wealth creation" to read: "The Comprehensive Plan supports the equitable geographic allocation of public funding and investment (especially for land use, housing, transportation, <u>community wealth creation</u> , public utilities, and parks) to ensure that the residents in these areas have the resources they need to thrive and prosper.		Agree
438	Payne-Phalen Community Council	Introduction	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.	N	Comment acknowledged	None		

439	Payne-Phalen Community Council	Introduction	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:	N	Payne-Phalen is one of the Neighborhood Nodes targeted for more intensive mixed-use development.	None		
440	Payne-Phalen Community Council	Introduction	5. Page 11: The section called People Infrastructure is great! Right on! Thank you!	N	Comment acknowledged.	None		
441	Payne-Phalen Community Council	Introduction	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.	N	Comment acknowledged.	None		
442	Payne-Phalen Community Council	Introduction	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.	N	The content and status of district and small area plans will be reviewed after adoption of the 2040 Comprehensive Plan by the Metropolitan Council.	None		
443	Payne-Phalen Community Council	Introduction	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:	N	Comment acknowledged	None		
444	Payne-Phalen Community Council	Introduction	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 of 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.	N	Resiliency is a core value.	None		

445	Payne-Phalen Community Council	Introduction	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 2nd 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.	N	Comment acknowledged. Staff may prepare a "Reader's Guide" once the Plan is adopted to help the reader/user make connections between the various levels of organization (value, focus area, theme, policy).	None		
446	Dustin Schroeder	Land Use	I would like to see a neighborhood node at Snelling and Minnehaha avenues. There is an A-line stop at Minnehaha and I've seen a good amount of investment in properties in the first block west and east of Snelling in this area and would like to see this area continue to develop (all along Snelling and nearby blocks). I think multifamily up to 6 units should be allowed in the first block on either side of Snelling from University up to Minnehaha at least. I also am interested in seeing details related to property setbacks and allowed density, particularly in neighborhood nodes. I support very accommodating building setbacks (near zero feet on front, sides and back) on lots in neighborhood nodes to allow for less restrictive housing options.	Y	OK	Add a Neighborhood Node on the Future Land Use Map (Map LU-2) at Snelling-Minnehaha.		Agree. Also add a note in the sidebar on p. 33 or on Map LU-2 that the circles indicating Neighborhood Nodes are representative of the boundary of the node, not the actual boundary of the node.
447	Amy Riley	Land Use	I live in LexHam, a community unlike many others in that we are an extremely close knit and very active group of neighbors. While I recognize that Selby between Lexington and Hamline is a transportation corridor, I absolutely do NOT want to see any giant mixed use residential and retail buildings going up like what happened at the corner of Selby and Snelling. Our community is quiet, walkable and safe and I oppose these two policies specifically: Policy LU-29: I disagree with increasing density towards the center of the Selby Snelling node between Lexington and Hamline. Policy LU-34 : I oppose structures being built higher than 3 stories for multi-family housing. Thank you for the opportunity of making my voice heard. Please keep the charm and peace in LexHam. Amy "Lucas" Riley. President of the Lexington Hamline Community Council	Y	The Selby-Milton NN listed on p. 33 was actually put at Selby-Dunlap (between Lexington and Hamline) on the map on p. 43.	Move NN from Selby-Dunlap to Selby-Milton.		Agree
448	Sara Dovre Wudali	Land Use	Policy LU-29: I agree with increasing density towards the center of the Selby Snelling node between Lexington and Hamline. I would like there to be more walkable retail in our neighborhood--restaurants, shops, doctor offices. I'd like to see some of the apartments/condos that may be built reserved as low-income options, so a mix of low, middle, and upper income housing. Please not all luxury apartments. But that said, I'd want to protect the Central HS garage and Youth Express on Dunlap/Selby. Adding more retail/appts might necessitate parking restrictions for streets with no alleys like Hague and Laurel so that residents have places to park.	Y	OK	Move Neighborhood Node to Selby-Milton per Lex-Ham comments		Agree

449	Sharon Garth	Land Use	The plan is very well crafted. I want to emphasize the importance of putting people first in economic development programs, education and housing. The needs of low/moderate income, culturally diverse people must be met. Livable wage jobs are a good start and now there must be a focus on affordable housing and cultural diversity planning.	N	Comment acknowledged.	None		
450	Glynn Murphy	Land Use	The entirety of the node plan seems like a way to keep diverse growth in our cities in areas that are already diverse and exclude diversity in areas that are currently not diverse.	N	The plan allows for growth across the city and increasing housing choice generally. It is unclear what is meant by "diversity" here.	None		
451	Connor Schaefer	Land Use	Support development near regional parks that is dense, walkable, and has access to frequent transit service. More people need to be able to live within walking distance of regional park facilities.	N	This is addressed in PR-4: Prioritize investment to ensure that residents have access to a park within a 10-minute walk, and generally with the concept of Neighborhood Nodes.	None		
452	Jake Reuter	Land Use	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.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		Agree. Also, amend T-38 to read: Seek opportunities to improve the environmental sustainability of rights-of-way in the city, such as through shared, stacked-function green infrastructure (SSGI), and planting trees to reduce the heat island effect, <u>and reducing the amount of land devoted to parking.</u>
453	Kory Andersen	Land Use	First and foremost I think that St Paul is in a unique position to draw a stark contrast to the Minneapolis 2040 Comp Plan. We've seen the document. In St Paul we should go farther in making our city a better and more livable place under the challenges of global warming and quickly diminishing resources. Among many strategies, we need to be bold by eliminating parking minimums altogether. I appreciate the roundabout solutions that the comp plan draft currently has to address parking, but given the reality of our world, it is somewhat tone deaf. For decades we have prioritized cars to the detriment of our city. It is time to swing it back and stop preserving SFH owner's non-existent right to parking in the public right of way.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		Agree
454	Kory Andersen	Land Use	2. Make sweeping zoning changes along major arterials to allow for much higher density housing and mixed goods. Some of the most charming multi-unit buildings in SP are currently illegal under the zoning code. Make it work again! Saint Paul has some beautiful neighborhoods and it makes sense to protect them...but the give should be along major routes.	Y	LU-33 and LU-34 address this, but LU-33 could be strengthened.	Change Policy LU-33 "Encourage" to " <u>Provide for.</u> "		Agree

455	District 1 Land Use Committee	Land Use	We first want to acknowledge the gravity of a document like the Comprehensive Plan. We inherit a legacy of zoning and land use policies that were used to advance the interests of white homeowners and protect white privilege by directly and indirectly designating where different racial groups were allowed to live in our city.	N	Comment acknowledged	None		
456	District 1 Land Use Committee	Land Use	pg. 29: LU-2, we request that this policy be changed to read “Pursue the potential for redevelopment of Opportunity Sites (generally sites larger than one acre identified as having potential for redevelopment) as higher-density mixed-use development, employment centers, and the addition of community services that are completely absent in the surrounding area, with increased full-time living wage job intensity (Figure LU-3).” Opportunity sites may be some of our best opportunities to add services to a community that are currently lacking. Since different opportunity sites have different land use categories, the exact ratio of these three outcomes will be very different from site to site.	Y	OK	Change Policy LU-2 to: <u>Pursue redevelopment of Opportunity Sites</u> (generally sites larger than one acre identified as having potential for redevelopment) as higher-density mixed-use development or employment centers with increased full-time living wage job intensity, <u>and the appropriate location for community services that are completely absent in the surrounding area</u> (Figure LU-3).		Agree
457	District 1 Land Use Committee	Land Use	LU-6, we request an additional point be added that reads “recognizing the ecosystem services provided by a development parcel and guiding development to preserve and enhance that community benefit.” It is important to us to acknowledge that natural systems perform important functions for the metro area. Trees moderate temperature, produce oxygen, and reduce particulate pollution. Wetlands filter water and act as a sponge. These services are going to become even more important in a changing climate. We believe that we can increase population and employment density while still preserving these important functions.	N	This is covered in LU-8, LU-9 and LU-18.	None		
458	District 1 Land Use Committee	Land Use	pg. 30: LU-10, add “wide sidewalks” to the list.	N	We have standards for sidewalk widths in the City's Street Design Manual. "Activate streetscapes" presupposes sidewalks.	None		
459	District 1 Land Use Committee	Land Use	pg. 31: LU-13, add “and strengthening parking maximums citywide.”	Y	Not sure what is meant by "strengthening" parking maximums.	Edit Policy LU-13: Change "minimums" to " <u>overall</u> ." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		Agree
460	District 1 Land Use Committee	Land Use	pg. 32: LU-20, we acknowledge the importance of the Tree Preservation Overlay District and the River Corridor Overlay District, and ask for specific engagement as the river corridor ordinances are brought into conformance with the new state Critical Area rules.	N	Comment acknowledged.	None		

461	District 1 Land Use Committee	Land Use	pg. 33: Add White Bear-Minnehaha and Suburban Commercial District to the Neighborhood Nodes list. See note for pg. 43.	Y	OK	Add White Bear-Minnehaha and Suburban Commercial District to the Neighborhood Nodes list and map.		Agree
462	District 1 Land Use Committee	Land Use	pg. 35: Change LU-39 to “Continue to require large lots for residential parcels with private utilities and/or steep slopes by use of a zoning overlay district rather than underlying zoning to preserve the natural ecosystem along the river bluffs.” Residents who choose to continue using private utilities need larger lots for health and environmental reasons, but residents who choose to connect to public utilities should not be obligated to retain the large lots necessary for private utilities.	Y	Agree with sentiment, but not requiring an overlay. Generally, overlays are cumbersome to administer and confusing to the public.	Edit Policy LU-39: "Maintain" to "Provide for."		Agree
463	District 1 Land Use Committee	Land Use	Change LU-40 to “Promote cluster development with public utilities on the flat portion of sites with steep slopes and heavy tree canopy to add density in a way that preserves the natural ecosystem along the river bluffs.”	Y	OK, but MRCCA regulations will govern what type of and how development occurs on sites with steep slopes.	Edit Policy LU-40: <u>Promote cluster development with public utilities to add density in a way</u> that preserves the natural ecosystem along the river bluffs.		Agree
464	District 1 Land Use Committee	Land Use	Add a new Semi-Rural policy that reads “promote the concentration of infill development and redevelopment on flatter parcels, especially those on arterial and/or collector streets, at densities similar to Urban Neighborhoods while being sensitive to the context of the surrounding area and preserving the natural feeling of the area.”	Y	OK	Add new Semi-Rural Policy LU-XX. <u>Promote context-sensitive infill development along arterial and collector streets, at densities similar to Urban Neighborhoods, while preserving the natural features of the area.</u>		Agree
465	District 1 Land Use Committee	Land Use	Add a new Semi-Rural policy that reads “continue to expand the availability of public utilities, where feasible, to provide the opportunity for voluntary utility connection to abutting properties.”	Y	OK	Add new Semi-Rural Policy LU-XX. <u>Expand the availability of public utilities, where feasible, to provide for voluntary connections to abutting properties.</u>		Agree
466	District 1 Land Use Committee	Land Use	Add a new Industrial policy that reads “require future uses of riverfront industrial parcels be those where access to and use of a surface water feature is an integral part of normal business operations.”	N	This is addressed in the MRCCA chapter.	None		
467	District 1 Land Use Committee	Land Use	Add a new Industrial policy that reads “encourage investment in industrial uses that use green practices and in the production of green technology.” We view these terms very broadly. Example industrial uses could include those that engage in urban agriculture including a future cannabis economy, those that produce renewable energy systems or energy efficient machinery, those that are water- and energy-efficient, and those that use lower-impact production processes.	N	A separate plan, the "Climate Action and Resilience Plan," is being prepared by the Chief Resiliency Officer in the Mayor's Office.	None		
468	District 1 Land Use Committee	Land Use	pg. 40: Add language to the Downtown description to acknowledge downtown’s role as a regional transportation hub.	Y	OK	P. 40 Change to: Downtown is the <u>highest-density</u> mixed-use core of Saint Paul and <u>a regional transportation hub</u> , encompassing all the B4 and B5 Zoning Districts and most of Planning District 17.		P. 40 Change to: Downtown is the <u>highest-density</u> mixed-use core <u>area</u> of Saint Paul and <u>a regional transportation hub</u> , encompassing all the B4 and B5 Zoning Districts and most of Planning District 17.

469	District 1 Land Use Committee	Land Use	Add a sentence to the end of the Semi-Rural description to read “infill development and redevelopment will be concentrated on arterial and/or collector streets and on flatter sites.”	Y	OK -same comments as #56.	Add new Semi-Rural Policy LU-XX. <u>Promote context-sensitive infill development along arterial and collector streets, at densities similar to Urban Neighborhoods, while preserving the natural features of the area.</u>		Agree
470	District 1 Land Use Committee	Land Use	pg. 43: We agree with the placement of all Neighborhood Nodes already identified in District 1. We request additional Neighborhood Nodes be designated at/around White Bear Ave & Minnehaha Ave and along Suburban Ave between White Bear Ave and Ruth St. The first addition provides a node in an area with residences over a mile from any other node and at the intersection of a state highway and county highway, and the second acknowledges a need for a neighborhood node south of a significant community barrier (I-94) and near existing multifamily housing.	y	OK	Add NN at White Bear-Minnehaha and White Bear-Suburban.		Agree
471	District 1 Land Use Committee	Land Use	Because District 1 was developed mid-century around a notion that residents would drive to every destination, there are far fewer existing nodes and commercial corridors than are seen in neighborhoods developed around the streetcar. We request additional nodes be designated at a scale and intensity less than Neighborhood Nodes, but still providing a mix of uses that serve the neighborhood they are in. We would like these minor nodes at: Minnehaha Ave & Ruth St, 3rd St & Ruth St, Upper Afton Rd & Ruth St, Upper Afton Rd & McKnight Rd, and Carver Ave & Point Douglas Rd. We do not specifically propose how to designate them on the map, but request that some designation be added to allow development similar to the T1 zoning district at these locations. This concept of minor nodes may also be useful to other districts with similar patterns of past development.	N	The definition of Urban Neighborhood states "Limited neighborhood-serving commercial may also be present, typically at intersections of arterial and/ or collector streets." All of these locations are arterial or collector streets, so each of these intersections would allow commercial uses.	None		
472	District 1 Land Use Committee	Land Use	We request you color green the Fish Creek Open Space. This is a significant County-owned park space that is part of a larger park complex stretching into Maplewood.	Y	OK	Add "Fish Creek Bluff Preserve" parcel to park use in Future Land Use Map.		Agree
473	District 1 Land Use Committee	Land Use	We request you designate the parcels along McKnight Rd, Carver Ave, Point Douglas Rd, and the east-west portion of Highwood Ave in South Highwood as Urban Neighborhood to correspond with the proposed Semi-Rural policy changes.	Y	New policy recommended in #62 will generally allow for increased densities, so no need to change map. Change designation of intersection of Carver/.Pt. Douglas to allow for limited commercial uses.	Add three parcels at intersection of Carver/Pt. Douglas to Urban Neighborhood.		Agree

474	District 1 Land Use Committee	Land Use	Finally, we are disappointed to see the designation of corridors removed in the transition from the 2030 Comp Plan to the 2040 Plan. Again, District 1 lacks historic streetcar corridors and so it needs intentional land use planning to concentrate uses along designated corridors to make businesses, transit, and multi-family housing more viable. We request some designation on the map that would allow a minimum of RM1 zoning along all collectors and arterials and higher intensities such as continuous RM2 or T2 zoning, with T3 zoning at major intersections, along more major arterials such as White Bear Ave and McKnight Rd. These streets should probably be designated mixed use. Intentional corridor-making will prevent incoherent, scattershot development in the district. Neighborhood Nodes should connect to one another along built-up corridors.	N	Policies allow for such rezonings.	None		
475	District 1 Land Use Committee	Land Use	pg. 45: We appreciate the delineation of Boys Totem Town as a different land use designation from Sun Ray and Suburban reflecting the fundamentally different future scale and function of these sites. A deliberate community outreach effort needs to be conducted before any changes are made to the Boys Totem Town site to determine what uses are needed by the community and appropriate on the site and what design standards are appropriate to administer in any future development.	N	Comment acknowledged.	None		
476	District 1 Land Use Committee	Land Use	pg. 46: We ask for specific engagement as the significant public views are identified, as many of our public comments during the Critical Area rulemaking process revolved around how views were defined and administered.	N	Comment acknowledged	None		
477	District 1 Land Use Committee	Land Use	pg. 51: In Figure LU-4, we request that the residential density range for Semi-Rural be changed to 2-15 units/acre. This reflects both the RL lot size of a half-acre (2 units/ac) and acknowledges the density likely to be seen in a cluster development. It also provides overlap with Urban Neighborhood to provide flexibility in the future and transition between the two designations.	Y	OK	Change base range in Figure LU-4 to 2-15 Units/Acre in Semi-Rural cell		Agree
478	Union Park District Council	Land Use	"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, " <i>Smaller scale residential and smaller scale commercial uses are the most appropriate 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.</i> " (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.	Y	OK	Move NN from Selby-Dunlap to Selby-Milton		Agree

479	James Slegers	Land Use	<p>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.</p>	Y	<p>The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.</p>	<p>Change Policy LU-33 "Encourage" to "Provide for."</p>	Agree
480	James Slegers	Land Use	<p>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.</p>	y	<p>It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.</p>	<p>Edit Policy LU-13: Change "minimums" to "<u>overall</u>." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u></p>	Agree

481	James Slegers	Land Use	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"	Y	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	Change Policy LU-33 from "Encourage" to " <u>Provide for.</u> "		Agree
482	James Slegers	Land Use	LU-11 and LU-28 should be eliminated. In general, neighborhood "character" and subjective aesthetic preferences should be kept out of zoning decisions. LU-11 and LU-28 which address "views" and gradual transitions are not needed, they add barriers and extra steps to denser development, restricting flexibility, and preferencing low density for subjective aesthetic reasons.	N	We do not agree. Views are generally from public streets and parks, and will not affect private buildings, with the exception of views of the Capitol. Views of the Capitol, as well as zoning and height in the Capitol Area, are regulated by the Capitol Area Architectural and Planning Board.	None		
483	James Slegers	Land Use	Add more Neighborhood Node locations in the Highland/MacGroveland/Summit Hill neighborhoods.	Y	Nodes were generally already placed at appropriate locations within these neighborhoods, with the exception of a couple nodes along the A Line.	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Snelling-St. Clair and Snelling-Minnehaha.		Agree
484	James Slegers	Land Use	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.	Y	Nodes were generally already placed at appropriate locations along these transit corridors, with the exception of a couple nodes along the A Line.	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Snelling-St. Clair and Snelling-Minnehaha.		Agree

485	Frank Alarcon	Land Use	<p>As a resident of Saint Paul, I would like the comprehensive plan to abolish single-family zoning and minimum parking requirements, like the Minneapolis 2040 plan. These policies restrict the supply of housing and raise the cost of development, contributing to the region's housing crisis that disproportionately harms people of color and people with low incomes. They also exacerbate climate change by guaranteeing space for cars and reserving swaths of the city for single-family homes only. Thank you.</p>	Y	<p>It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study. The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.</p>	<p>Edit Policy LU-13: Change "minimums" to "<u>overall</u>." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u></p>		Agree
486	SS	Land Use	<p>There are many things to like in the draft plan, but one glaring absence is a focus on supporting education. Jobs and economic vitality, parks and open spaces, equity, transportation--all these important topics are considered, but not education. This plan should include stated support for education and educational institutions: SPPS, K-12 public charters, K-12 private schools as well as early childhood and higher education. The Land Use section should specifically call out educational uses, and encourage and support quality educational facilities within our city. Good schools are an attraction to families, an investment in the future, and a tool to help achieve many of the goals of the plan: equity, high quality of life for all St Paulites.</p>	N	<p>Since the City does not control the siting, size or type of schools in Saint Paul, this specific of a recommendation is outside the scope of the Comprehensive Plan. However, LU-32 supports, in general, the location of schools and libraries at Neighborhood Nodes.</p>	<p>None</p>		
487	Eric Osekowsky	Land Use	<p>The one area I would like to comment further on is development of transit corridors and the identified Nodes. Looking over the 2040 plan I'm pleased see, what appears to be, an intention to encourage mixed use development along essentially all of St. Paul's significant transit corridors (p. 43) guided by the intention to make efficient use of transit infrastructure (p. 52). I hope the city continues to push for significant change (where appropriate) as we saw earlier this year with the rezoning study for Snelling south of 94.</p>	N	<p>Noted. Per Policy LU-1 the intent is to accommodate growth along transit corridors.</p>	<p>None</p>		

488	Eric Osekowsky	Land Use	In particular I'm thinking of my neighborhood, Midway, where I live a couple blocks off Snelling. Being right off both the A line and the green line, a short drive from 94 and right between both downtowns I often think about how the composition (and zoning) of this stretch of Snelling as it stands now is a poor use of an area with a very valuable location and fantastic transit options. Given the amount of investment which has gone into the Green and A lines, and the potential unlocked with the redevelopment of the Midway shopping center I hope St. Paul looks beyond the immediate Snelling & University Node area when executing this plan. And I really hope we see a zoning study for the north end of Snelling Ave.	Y	OK	Add implementation item to conduct zoning studies as major transit improvements are made.		Agree
489	Nancy O'Brien Wagner	Land Use	Where decreasing parking requirements?	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
490	Elisabeth Wurtmann	Land Use	Further, I urge the city to pass a plan written to allow significant increases in density in the Neighborhood Nodes, with an increased number of nodes.	Y	OK	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Selby-Milton; Snelling-St. Clair; Snelling-Minnehaha; E 7th-Payne; Arcade-Case; Arcade-Maryland; White Bear-Minnehaha; White Bear-Suburban; Cook-Phalen		
491	Elisabeth Wurtmann	Land Use	Additionally, I support the elimination of parking requirements to allow increased density and a greater emphasis on our city's strong public transit options.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
492	Rick Varco	Land Use	I support building the plan around meeting the needs of the expected population growth (344,100 by 2040 p. 6). In general, this goal requires a broad upzoning of all parts of the city. The city must allow the private market the flexibility to add housing when/where it is needed. I strongly agree “the only way to grow is by increasing densities on infill parcels as they become available” (p. 8). But, the only way to make sure that happens is to broadly upzone the city and the plan needs more specific language towards that end.	N	LU-33 and LU-34 support increasing density in Urban Neighborhoods. In addition, Land Use Implementation items 4, 9 and 13 support zoning code changes to allow additional density by-right.	None		

493	Rick Varco	Land Use	More importantly the population goal needs to be supplemented in two important ways. First, we need more explicit calculations about exactly how much of the city must be upzoned to meet this target. For example, if all currently single-family only zones were converted to RM1 or T3, how much additional housing could we expect to see? We will not reach the target with a general aim of ‘more’, we need specific targets.	N	Figure LU-4 gives density ranges for future land uses.	None		
494	Rick Varco	Land Use	LU-7 is too vague. The city should broadly upzone and allow multi-family housing without parking minimums throughout the city.	N	The intent of the chapter is to provide general policy guidance for growth. Policies LU-1, LU-7 and LU-8 allow for a broad zoning study to allow additional density by-right. LU-33 and LU-34 support more medium-density housing in Urban Neighborhoods.	None		
495	Rick Varco	Land Use	Delete LU-11. Preserving “views” is not a valid public goal and can only be used to block needed density.	N	We do not agree. Views are generally from public streets and parks, and will not affect private buildings, with the exception of views of the Capitol. These views, along with height and zoning in the Capitol Area, are regulated by the Capitol Area Architectural and Planning Board.	None		
496	Rick Varco	Land Use	In LU-13, change “reduce parking minimums” to “eliminate”. Parking minimums add to housing costs and force all of us to subsidize car owners. Those who want and need parking should pay for it and those without cars or satisfied with on-street parking shouldn’t have to pay.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall</u> ." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
497	Rick Varco	Land Use	LU-16 is acceptable as long as it does not become a de facto height limit.	N	That is the intent of "accounting for the development rights of adjacent properties."	None		
498	Rick Varco	Land Use	Delete LU-28. There is no need to ensure ‘gradual transitions’. Transitions in building height whether gradual or radical harm no one and can only be used to block needed density.	Y	OK	Delete "gradually"		
499	Rick Varco	Land Use	The draft should clarify that Neighborhood Nodes will have, not just “increased” (LU-29) but the maximum allowable density under the St. Paul code. Ideally, all residential areas in each Neighborhood Node should be upzoned to the maximum residential zoning (RM3 or T4). At minimum, the Neighborhood Node designation should provide for the upzoning of every parcel in the area.	N	All Neighborhood Nodes are not intended to have the same density.	None		

500	Rick Varco	Land Use	The draft should add more node locations in the Highland/MacGroveland/Summit Hill areas.	Y	Nodes were generally already placed at appropriate locations within these neighborhoods, with the exception of a couple nodes along the A Line.	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Snelling-St. Clair and Snelling-Minnehaha.		
501	Rick Varco	Land Use	Just as the draft places nodes all along University Ave and the Light Rail line, it should do the same for all of West 7th and the Riverview Corridor and for the route of the A Line BRT. If we prevent people from living along these expensive public investments, we diminish their utility and waste tax payer dollars. Furthermore, the plan should stipulate that the routes of any future BRT will be automatically upgraded to Neighborhood Node status.	Y	Neighborhood Nodes are proposed for all Gold Line, Rush Line, and Riverview Corridor stops. Not all A Line stops are proposed for Neighborhood Nodes because there are not station area plans completed or proposed for the A Line.	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Snelling-St. Clair and Snelling-Minnehaha.		
502	Rick Varco	Land Use	LU-33 Strengthen “encourage” to “allow by right”. There is no reason for the city to block this development.	Y	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	Change Policy LU-33 "Encourage" to "Provide for."		
503	Rick Varco	Land Use	LU-50 College neighborhoods must be required to upzone to provide sufficient housing for students. All campus adjacent land should be designated as Neighborhood Nodes.	N	The City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	None		

504	David Sullivan-Nightengale	Land Use	Policy LU-54 No new construction should be allowed near the routes of high hazardous freight trains in St. Paul as it will be impossible to prevent fatalities in a derailment in close proximity to the tracks hauling hazardous materials. While many rail accidents occur at intermodal facilities, these are of lower severity due to the slow speeds at these facilities. The most severe occur between facilities where the potential for derailment of multiple cars in urban areas near homes and businesses exist. The at-grade crossing at Como with the BNSF should be part of the plan for long-term mitigation through grade separation. Additional measures to prevent pedestrians from getting injured by walking on the freight rail tracks need to be pursued.	N	Comment acknowledged,	None		
505	David Sullivan-Nightengale	Land Use	Map T-17: No new facilities for rendering animal products or composting facilities should be near the St. Paul Downtown Airport as this increases the risk of bird strikes with aircraft. This could affect the airport operating certificate. Please include the reference to the Airport Operations Plan.	N	Animal rendering is not allowed in Saint Paul. Composting is a conditional use in I-1 and I-2 districts, which surround the airport. A Conditional Use Permit application that interfered or created a land use/safety conflict with the airport would be denied.	None		
506	David Sullivan-Nightengale	Land Use	Policy LU-56 Prior to expanding river terminals, and EIS should be required to consider the environmental mishap potential. Recreational traffic needs to have a reasonable distance from these facilities.	N	Expansion of river terminals would follow all applicable State and Federal environmental regulations.	None		
507	Coalition of Asian American Leaders	Land Use	Cultural corridors and neighborhood planning. Little Mekong in St. Paul is a good example of a community led cultural district that would benefit from investment from the city. Coordinate the development of housing, businesses, and infrastructure in geographic areas where a district-wide approach has the greatest opportunity for achieving goals. We recommend that municipalities evaluate land and zoning use to respond to social, economic, market, and environmental contexts for the Asian community. Also prioritize public investments to areas of concentrated poverty as defined by the Metropolitan Council.	N	This is supported in the draft 2040 Comprehensive Plan.	None		
508	Chelsea DeArmond	Land Use	I was encouraged by policies that increase urban density, develop neighborhood nodes, encourage accessible public transit, prioritize walking and biking, and improve access to parks and green space.	N	Comment acknowledged	None		

509	Luke Hanson	Land Use	We should follow the Minneapolis 2040 plan and relax government restrictions on multi-family housing throughout the city and eliminate parking requirements.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study. The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	Edit Policy LU-13: Change "minimums" to " <u>overall</u> ." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
510	Luke Hanson	Land Use	LU-13 should “eliminate” parking minimums rather than “reduce” them. Parking minimums inherently favor automobiles as a mode of transportation, burdening business owners and housing developers with additional costs that are passed to consumers and residents, and undermining the possibility of St. Paul being a transit-friendly, walkable community.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall</u> ." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
511	Luke Hanson	Land Use	LU-28 should be deleted. Transitions in building height harm no one, whether they are gradual or sudden. This policy would only be used to block development which is deemed too dense.	Y	OK	Delete "gradually"		

512	Luke Hanson	Land Use	LU-33 should not just “encourage” medium-density housing, but “allow by right.”	Y	A policy in the Comprehensive Plan cannot allow anything by right. The City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	Change Policy LU-33 "Encourage" to " <u>Provide for</u> ."		
513	Luke Hanson	Land Use	LU-50 This policy is vague. College neighborhoods should be upzoned to provide sufficient rental housing for students in the immediate vicinity. The current Student Housing Neighborhood Impact Overlay District should be eliminated.	N	The City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	None		
514	Luke Hanson	Land Use	The plan should do more to clarify and specify how much density would be allowed in Neighborhood Nodes, and allow significant increases over the existing limits.	N	Density table is provided in Figure LU-4. The Comp Plan would support rezoning that fits within these density ranges.	None		
515	Luke Hanson	Land Use	Stations along current and planned transit lines (the Riverview Corridor, the A Line BRT, and future BRT Lines) should automatically be upgraded to Neighborhood Nodes.	Y	This has been done with the exception of the A Lane, which does not have station area plans.	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Selby/Milton; Snelling/St. Clair; Snelling/Minnehaha; E 7th/Payne; Arcade/Case; Arcade/Maryland; White Bear/Minnehaha; White Bear/Suburban; Cook/Phalen		
516	Luke Hanson	Land Use	More Neighborhood Nodes should be added throughout the city, particularly in Highland, Macalaster-Groveland, and Summit Hill, where they are conspicuously few in the current draft. Examples: Grand-Cleveland, Grand-Snelling, Grand-Hamline, Grand-Lexington, St. Clair-Fairview, St. Clair-Snelling, St. Clair-Hamline, St. Clair-Lexington, Randolph-Cleveland, Randolph-Fairview, Randolph-Hamline, Randolph-Lex, Snelling-Ford, Hamline-Ford, Marshall-Fairview, Marshall-Snelling, Selby-Fairview, Selby-Victoria, Hamline-Thomas, Fairview-Minnehaha, Maryland-Rice, Arlington-Rice.	Y	OK	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Selby-Milton; Snelling-St. Clair; Snelling-Minnehaha; E 7th-Payne; Arcade-Case; Arcade-Maryland; White Bear-Minnehaha; White Bear-Suburban; Cook-Phalen		

517	Eric Saathoff	Land Use	<p>I hope the city takes this opportunity to eliminate parking minimums citywide. There is no reason that the city should be enforcing a car-centric transportation system. Residents and business owners should decide what amount of parking they need and supply it themselves. This is an easy way to make housing more affordable and make it easier to do business in our city.</p>	Y	<p>It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.</p>	<p>Edit Policy LU-13: Change "minimums" to "<u>overall</u>." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u></p>		
518	Eric Saathoff	Land Use	<p>I also hope the city will take this opportunity to follow the footsteps of Minneapolis in upzoning either the entire city or vast portions of it. There is no way to reduce the cost of housing by restricting the supply. The city of St. Paul has an enormous amount of single family zoned neighborhoods. We need to upzone to allow more supply of housing. If this is to be done in nodes, there should be more nodes that follow transit corridors (bus lines) and existing commercial corridors.</p>	Y	<p>The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.</p>	<p>Change Policy LU-33 "Encourage" to "<u>Provide for</u>."</p>		

519	Al Davison	Land Use	Regarding land use, more mixed-use and medium-density development can help strengthen our neighborhoods and it will help with the current housing shortage. Higher-density development can help further strengthen our downtown, and other places such as around Snelling and University. Saint Paul has the ability to support more residents and through reforming zoning regulations, the city could allow better opportunities for more housing choices across the city. The city can support more multi-family housing without affecting the city's large stock of single-family homes. Sites such as the Ford Site can help preserve the existing housing stock within Highland Park, while still adding more housing units of various types (from single-family to multi-unit apartments/condos). It is good that the city acknowledges the importance of infill development in the 2040 plan, but having a strong emphasis on strict height limits and other regulations has affected development from occurring in the city in the past; zoning reform of a large scale must be done in order to truly invest in future developments across the city, regardless if it is located in a designated "neighborhood node" or not.	Y	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	Change Policy LU-33 "Encourage" to "Provide for."		
520	Al Davison	Land Use	The city's residents face inequality based off racial and socioeconomic factors and housing has a major impact on people's lives. The city needs more housing, especially housing that low and middle-income residents can afford. Neighborhoods such as Rondo and the North End will thrive more when residents are able to have better housing choices. The current exclusionary zoning regulations that the city has restricts housing into single-family zones in many areas, which has contributed to the current housing shortage and income inequality that residents face. Duplexes, triplexes, and fourplexes easily integrate into areas that primarily contain single-family housing and they can help reduce housing costs. Accessory dwelling units (ADUs) are another great way to add small-scale housing options within existing lots. I currently live in a sevenplex in what used to be a single-family home, and since that was allowed to happen before existing zoning restrictions – the existing housing stock was preserved, with the benefit of the addition of more affordable housing units to the city's housing stock. I likely wouldn't be living where I am today if the current zoning regulations blocked this house from becoming a sevenplex.	N	LU-33 & LU-34 allow for increased housing options, as suggested.	None		

521	Al Davison	Land Use	Regarding transportation, removing (or at least reducing) parking minimums (ex: LU-13) can help base an area's actual parking demand off the true market demand rather than inducing parking demand off arbitrary metrics set forth by local government. Minimum parking regulations have caused the unnecessary destruction of buildings for surface parking. Surface parking lots have hurt the city's commercial corridors along Payne, Rice, and University since the mid-20th century. We have limited space in the city, and we have to acknowledge that large surface parking lots tend to negatively impact urban neighborhoods. In areas with high parking demand, paid parking meters and ramps should be considered since parking is an expensive asset to build and maintain. Designated [handicap] parking for disabled people can remain a priority for where it is needed. While parking in the city can be difficult in some places, there is a limit on the economic feasibility to build/maintain parking by both businesses and the city. We have to be more proactive in parking management, and the city's goals towards promoting shared parking is a good step forward.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
522	Zack Mensinger	Land Use	I really love many aspects of the 2040 plan as written. Two of the most important changes that could be enacted are upzoning and eliminating parking minimums. With that in mind, I think two of the most important aspects of the plan are those in H-48, which upzones nearly all of the city, moving away from racially discriminatory single-family zoning, and those in LU-13/14, discussing parking.	N	Comment acknowledged.			
523	Zack Mensinger	Land Use	While the goals of LU-13 are laudable as is, language in LU-13 should be changed to ELIMINATE, not just reduce parking minimums. And instead of just "supporting" these strategies, they should just be more firmly and completely adopted. If we are to truly reduce auto-dependency and fight climate change, we have to reduce the availability of excess parking in St. Paul. While some might argue that eliminating parking minimums would hurt businesses, I have almost never encountered an area without an excess of parking in St. Paul, plus, parking costs are quite high so requiring them puts small businesses at a disadvantage relative to larger businesses and chains that can more easily afford the costs of parking. Businesses can still provide parking if they see fit, but we should not require an excess of an expensive and environmentally damaging parking spaces. In doing so, we also help encourage people to travel by means other than personal cars, which will make these methods safer and more accessible for everyone.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		

524	Zack Mensinger	Land Use	I love the idea of Neighborhood nodes, but some of them seem misplaced or missing in general. For instance, there is a Node at Kellogg/3rd and Maria. But there is almost nothing at this intersection other than one small market. In contrast, there are many missing Nodes, such as Randolph and Lexington, Snelling and Minnehaha, etc. These intersections have many more resources and attractions, not to mention are better served by transit and therefore should be added as additional Neighborhood Nodes. Generally, any areas that are located along high frequency, high capacity transit (such as the Green and A Lines) should be classified as Neighborhood Nodes. Density allowances at Neighborhood Nodes should also be clarified.	Y	3rd/Maria is a Gold Line BRT stop. Snelling-Minnehaha is considered part of Snelling-University. Density ranges of Neighborhood Nodes are defined in Figure LU-4.	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Selby-Milton; Snelling-St. Clair; Snelling-Minnehaha; E 7th-Payne; Arcade-Case; Arcade-Maryland; White Bear-Minnehaha; White Bear-Suburban; Cook-Phalen		
525	Center for Economic Inclusion	Land Use	Re: Goal - One of the places the draft comprehensive plan could include such a goal [for creating a more racially equitable economy] is among the other goals in the Land Use chapter on page 28. Additionally, the policies in that chapter that support the economic inclusion goal could be organized under it (as is done in other chapters).	Y	A goal for a racially- equitable economy is better suited to an economic development strategy.	Add a short-term item to Implementation: <u>Prepare a comprehensive, city-wide economic development strategy, with a focus on racial equity. It should include local-scaled topics, such as Neighborhood Nodes, as well as regional issues, such as transit and workforce development.</u>		
526	Center for Economic Inclusion	Land Use	Re: policies - To more effectively bridge vision and execution, the Center suggests that the City provide more detail in the implementation chapter of the plan. In particular, the land use implementation section would be strengthened by: • Connecting each implementation action to the comprehensive plan policies and goals it advances. • Identifying potential indicators for measuring the success of each action.	N	Because of the integration of multiple policies into single implementation actions, and vice-versa, such connection would be difficult. When we explored this earlier on, the tables got very large and cumbersome - the net effect was actually significantly decreased clarity. With regard to indicators, this could be done under the umbrella of Planning Commission's annual evaluation. The Planning Commission is particularly interested in tracking implementation of the 2040 Comprehensive Plan. The detail suggested by the commenter could be used as a way to organize and report on implementation activities.	None		

527	Center for Economic Inclusion	Land Use	Re: data - The plan continues by identifying the “Area of Concentrated Poverty with 50% or More of People of Color” (ACP50) in Saint Paul. Furthermore, policy LU-3 states that the City will “prioritize public investments relative to areas of concentrated poverty.” The plan notes that Saint Paul’s ACP50 “shows a concentration of the highest percentages by block group of carless households, families living in poverty, non-English-speaking households, severely cost-burdened households, and populations 25 years and older with no bachelor’s degree. The ACP50 area also exhibits the lowest high school graduation rates in Saint Paul.”	N	Comment acknowledged	None		
528	Center for Economic Inclusion	Land Use	Re: data - In addition to disaggregating the data in the plan, the Center encourages the City to further ground the plan’s policies in data. For example, policy LU-4 seeks to minimize displacement in redevelopment areas with high-frequency transit. What specific areas are these, and how do we know? What measures are used to identify displacement risk, and what does the data tell us about those areas?	Y	High-frequency transit is identified in Figure T-7. Measures to identify displacement risk and other relevant factors will be identified as part of plan implementation.	Reference map T-7 in LU-4.		
529	Center for Economic Inclusion	Land Use	For example, Policy LU-6 states “Foster equitable and sustainable economic growth by [actions 1-10]. How will these actions foster and sustain equitable economic growth? How will the City apply an equity lens to this policy? Which of the seven goals in the land use chapter does this policy support? Which of these actions will be focused on communities of color? Which ones will be applied evenly, city-wide? The Center encourages the City to expand upon this policy with a more detailed discussion of how it will advance equity and economic inclusion.	Y	This policy lays the basic principles for the City's economic development goals. We agree that this needs additional detail, including how it will be implemented. The best form for this would be a city-wide economic development plan or strategy.	Add a short-term item to Implementation: <u>Prepare a comprehensive, city-wide economic development strategy, with a focus on racial equity. It should include local-scaled topics, such as Neighborhood Nodes, as well as regional issues, such as transit and workforce development.</u>		
530	Center for Economic Inclusion	Land Use	Saint Paul for All includes several commitments to use an equity lens in decision-making and evaluation, including: • “Consider a process to further evaluate and monitor equitable distribution of community amenities.” (Item 11 in the Land Use Chapter implementation table).	N	Comment acknowledged	None		
531	Center for Economic Inclusion	Land Use	The Center also encourages the City to provide more detail in the implementation section of the plan, especially regarding the policies that seek to advance economic inclusion. The introduction to the implementation chapter includes the following among ten “general implementation” actions: “implement and regularly update the City’s Racial Equity Plan to realize and measure equity-related goals and policies.” Also, the land use chapter implementation table includes “Implement Economic Development Strategy.” How do the racial equity plan and economic development strategy work together to implement comprehensive plan policies? Where do their goals, strategies and measures overlap and diverge? Given the reality of limited resources, what among these plans and strategies will be prioritized in the near term?	Y	Agree with the need for a comprehensive Economic Development Strategy and for it to be informed by the Racial Equity Plan.	Add a short-term item to Implementation: <u>Prepare a comprehensive, city-wide economic development strategy, with a focus on racial equity. It should include local-scaled topics, such as Neighborhood Nodes, as well as regional issues, such as transit and workforce development.</u>		

532	Center for Economic Inclusion	Land Use	<p>To clarify these questions, the Center suggests that the City include a more detailed implementation matrix in the plan’s land use section. Currently, it includes a list of actions, their timelines (short-, medium- or long-term) and a list of potential funding sources. The Center encourages the City to enhance this section by:</p> <ul style="list-style-type: none">• Connecting each implementation action to the comprehensive plan policies and goals it advances.• Identifying potential indicators for measuring the success of each action.	N	The Planning Commission is particularly interested in tracking implementation of the 2040 Comprehensive Plan. The detail suggested by the commenter could be used as a way to organize and report on implementation activities.	None		
533	Tom Dimond	Land Use	<p>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.</p>	N	Comment acknowledged	None		
534	Tom Dimond	Land Use	<p>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.</p>	N	Not sure what the commenter is referring to, but we do not agree.	None		
535	Tom Dimond	Land Use	<p>The City should not locate hazardous material facilities in our neighborhoods without prior notification of neighbors.</p>	N	Comment acknowledged	None		
536	Tom Dimond	Land Use	<p>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)</p>	N	There is likely to be a master plan for the site, should Totem Town no longer be used as a residential facility. The purpose of the designation as an Opportunity Site is to allow for the study of a wide range of possible future uses.	None		
537	Tom Dimond	Land Use	<p>LU-20 - add - "and habitat" after natural resources (page 32)</p>	Y	OK	Policy LU-20 Add "and habitat" as noted		
538	Tom Dimond	Land Use	<p>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)</p>	Y	OK	Policy LU-36, change " while minimizing reduction of tax base " to " <u>and leverage other public investment.</u> "		
539	Tom Dimond	Land Use	<p>LU-39&40 - substitute - substitute "Natural Ecosystem" for Semi Rural (page 35)</p>	N	The "Semi-Rural" name is based on the zoning classification	None		

540	Tom Dimond	Land Use	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)	Y	OK	Change LU-42 to " <u>support and encourage development that maximizes</u> tax base, job creation and/or job retention."		
541	Tom Dimond	Land Use	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)	N	LU-43 refers to industrial sites. None of the districts the commenter mentions are industrial.	None		
542	Tom Dimond	Land Use	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	N	Surface parking is inefficient and reduces vitality around the Capitol.	None		
543	Tom Dimond	Land Use	LU-53- support - "freeway lids" and landscaping (page 53)	N	Comment acknowledged	None		
544	Tom Dimond	Land Use	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)	N	Rail facilities are an important component of a strong transportation, jobs and economic development strategy.	None		
545	Tom Dimond	Land Use	LU-55 - add - "and natural resource protection and enhancement" after urban development (page 53)	Y	OK	add " <u>and environmental protection.</u> "		
546	Tom Dimond	Land Use	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.	N	The Semi-Rural designation makes the zoning in Highwood conforming to the Comp Plan.	None		
547	Tom Dimond	Land Use	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.	N	We agree, and the Plan does.	None		

548	Saint Anthony Park Community Council (SAP)	Land Use	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.	N	Comment acknowledged	None		
549	Saint Anthony Park Community Council (SAP)	Land Use	(note the misspelling of “vehicle” in LU-13)	Y	OK	Correct		
550	Saint Anthony Park Community Council (SAP)	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.	Y	OK	Change LU-42 to "support and encourage <u>development that maximizes</u> tax base, job creation and/or job retention."		
551	Saint Anthony Park Community Council (SAP)	Land Use	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.	N	The Minneapolis policies referenced are covered by LU-6, LU-47, LU-49, WR-2, WR-3 and WR-4. Additionally, Saint Anthony Park Creative Enterprise Zone and Towerside efforts are supported by Land Use implementation items 16, 17 and 18.	None		

552	Saint Anthony Park Community Council (SAP)	Land Use	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.	Y	Comment acknowledged	Change implementation items 17-18 to short-term.		
553	Saint Anthony Park Community Council (SAP)	Land Use	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.	N	The Minneapolis policies referenced are covered by LU-6, LU-47, LU-49, WR-2, WR-3 and WR-4. Additionally, Saint Anthony Park Creative Enterprise Zone and Towerside efforts are supported by Land Use implementation items 16, 17 and 18.	None		
554	Saint Anthony Park Community Council (SAP)	Land Use	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: 1. 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.	N	This is addressed in LU-33 & 34.	None		
555	Saint Anthony Park Community Council (SAP)	Land Use	2. Policy LU-4 is vague and would benefit by being more specific. What means and measures are being considered to minimize displacement?	N	The Comp Plan is not intended to have policies that specific. The intent is to establish that addressing the threat of displacement is a matter of City policy and a priority. Specific measures will follow with future action, such as programs, studies, etc.	None		
556	Saint Anthony Park Community Council (SAP)	Land Use	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.	Y	LU-6 lays the basic principles for the City's economic development goals. We agree that this needs additional detail, including how it will be implemented. The best form for this would be a city-wide economic development plan or strategy.	Add to the Implementation section: <u>Prepare a comprehensive, city-wide economic development strategy.</u>		

557	Saint Anthony Park Community Council (SAP)	Land Use	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?	N	See Heritage and Cultural Preservation chapter.	None		
558	Saint Anthony Park Community Council (SAP)	Land Use	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.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to "overall." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
559	Saint Anthony Park Community Council (SAP)	Land Use	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.	Y	Comment acknowledged.	Change to "Map LU-6"		
560	Saint Anthony Park Community Council (SAP)	Land Use	7. In the Neighborhood Node section, we recommend “Neighborhood Nodes will be denser...” replace “The intent is for Neighborhood Nodes to be denser...”	Y	Agree	Change to read: " <u>Neighborhood Nodes are denser concentrations...</u> "		
561	Saint Anthony Park Community Council (SAP)	Land Use	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.	Y	OK	Add an implementation item for freeway lids		
562	Saint Anthony Park Community Council (SAP)	Land Use	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.	Y	OK	Review and adjust Map LU-2, as appropriate.		

563	Saint Anthony Park Community Council (SAP)	Land Use	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.	Y	Agree	Review and add views, as appropriate		
564	Saint Anthony Park Community Council (SAP)	Land Use	12. The boundaries for Mixed-Use in the Neighborhood Nodes should allow for expansion where appropriate to improve access to goods and services.	N	Addressed in LU-26.	None		
565	Saint Anthony Park Community Council (SAP)	Land Use	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.	Y	Nodes are located at all transit stops with the exception of the A Line, for which there are no station area plans.	Add Mixed Use to Como-Snelling Neighborhood Node on Map LU-2.		
566	Saint Anthony Park Community Council (SAP)	Land Use	14. Medium density housing should be allowed by right (as per Policy H-48), rather than simply “encouraged” in Urban Neighborhoods (Policy LU-33).	Y	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	Change Policy LU-33 "Encourage" to "Provide for."		

567	Saint Anthony Park Community Council (SAP)	Land Use	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.	N	Comment acknowledged	None		
568	Saint Anthony Park Community Council (SAP)	Land Use	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.minneapolisparcs.org/_asset/895jfr/Chapter-4-Parks-Regional-Trail.pdf .	N	Comment acknowledged	None		
569	Dan Marshall and Millie Adelsheim	Land Use	We strongly believe that the comprehensive plan should promote and allow density throughout the city, not just along transit corridors. We should follow Minneapolis' lead and abolish exclusionary zoning that allows only single family homes. By design, single family zoning promotes car use, reduces walkability, and tends to exclude low-income residents, stratifying our city by income.	Y	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	In Policy LU-33, change "Encourage" to "Provide for."		

570	Dan Marshall and Millie Adelsheim	Land Use	There is high demand for more housing throughout the city. Promoting increased density will not only help meet this growing need, but will also increase the city's tax base, promote transit over car use, and provide more customers for local small businesses. Density needs to be encouraged everywhere in order to prevent gentrification and sprawl. If we don't allow growth in more affluent neighborhoods currently dominated by single family homes, then growth will occur only in less affluent neighborhoods and the exurbs.	N	Comment acknowledged	None		
571	Dan Marshall and Millie Adelsheim	Land Use	The following policies should be included in the Comprehensive Plan: • Parking minimums should be eliminated throughout the city.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to "overall." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
572	Karen Allen	Land Use	I am very support of the broad up-zoning plans, the Neighborhood Node concept and increased focus on density and public transportation.	N	Comment acknowledged	None		
573	Karen Allen	Land Use	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.	Y	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	Change Policy LU-33 "Encourage" to " <u>Provide for.</u> "		

574	Karen Allen	Land Use	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.	N	Comment acknowledged	None		
575	Karen Allen	Land Use	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.	N	See Heritage and Cultural Preservation Chapter	None		
576	Karen Allen	Land Use	<ul style="list-style-type: none">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.	N	Density table is provided in Figure LU-4. The Comp Plan supports rezoning that fits within these density ranges. Growth can easily be accommodated within these ranges.	None		
577	Karen Allen	Land Use	<ul style="list-style-type: none">Density should be increase throughout the city, not just at Neighborhood Nodes.	N	Plan allows for increasing density in Urban Neighborhoods as well.	None		

578	Karen Allen	Land Use	<ul style="list-style-type: none">• LU-7 is too vague. The city should broadly upzone and allow multi-family housing without parking minimum throughout the city.	N	support ongoing flexibility and updates to land controls. The Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	None		
579	Karen Allen	Land Use	<ul style="list-style-type: none">• LU-13 Change “reduce parking minimums” to “eliminate”. Especially pertinent for small multi-family residences (duplex up to ‘missing middle’ style buildings)	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to "overall." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
580	Karen Allen	Land Use	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.	N	noted	None		
581	Karen Allen	Land Use	Neighborhood Nodes Policy - p.33, Land Use Appendix A, Map LU-2 - p.42 • Add more locations in Highland/Mac/Summit Hill.	Y	OK	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Snelling-St. Clair and Snelling-Minnehaha.		

582	Karen Allen	Land Use	Neighborhood Nodes Policy - p.33, Land Use Appendix A, Map LU-2 - p.43 • Similar to University, all of West 7th/Riverview corridor should be NNs. Same for the A Line Bus BRT. Anything along a train or BRT Route should automatically be NN.	Y	Nodes were generally already placed at appropriate locations along these transit corridors, with the exception of a couple nodes along the A Line.	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Snelling-St. Clair and Snelling-Minnehaha.		
583	Karen Allen	Land Use	<ul style="list-style-type: none">• LU-33 Strengthen “encourage” to “allow by right”. There is no reason for the city to block this development.	Y	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	Change Policy LU-33 "Encourage" to " <u>Provide for.</u> "		
584	Karen Allen	Land Use	<ul style="list-style-type: none">• LU-50 College neighborhoods must be required to upzone to provide sufficient housing for students. All campus adjacent land should be NN.	N	Noted	None		
585	Creative Enterprise Zone	Land Use	The Creative Enterprise Zone (CEZ), formally recognized by the City’s Planning Commission in April 2013 as a special business development district serves to highlight the naturally occurring and intentional relationship between people, place, built environment, and economic development. The vibrant ecosystem of industry and entrepreneurial startups produces a creative economy within the CEZ boundaries that provides essential economic power for the city of Saint Paul and adjacent cities. The Creative Enterprise Zone is the second largest employment center for the city, and the number one source of tax base, both crucial metrics. (See attached info graphic). The board of the Creative Enterprise Zone organization supports many of the elements in the 2040 Comp Plan and also supports comments offered by the SAPCC and Towerside organizations.	N	Comment acknowledged	None		

586	Creative Enterprise Zone	Land Use	Our focus is on the real and urgent threat to the stability of the area that must be addressed through a combination of land use, zoning, public investment, and civic engagement. We have heard a Chicago based developer indicate that the CEZ is the “last real value in the entire country for real estate development.” The pace of real estate sales for current building stock, the rate of development—commercial and community including increased households—shows that transit produces transformative development for a region. We acknowledge that increased density, mixed uses, and the pressure of displacement will continue to define the area.	N	Noted	None		
587	Creative Enterprise Zone	Land Use	In 2018 CEZ commissioned a study to identify the numbers and types of creative businesses operating in the Zone. The study (attached) found more than 300 creative businesses inhabiting a range of spaces with varying sizes and scales of operation. The study highlights the way creative and entrepreneurial economic development needs policies and investments to transition to the next stage of growth and continue to thrive as a vehicle for enterprise, jobs and job creation, creativity, and innovation. This grows more urgent each day as buildings are sold and redeveloped to lower standards and businesses decide where they will chose to operate.	N	Noted	None		
588	Creative Enterprise Zone	Land Use	The local, regional, and global economy is rapidly changing and maker spaces are an opportunity to incubate one of the fastest growing local sectors, creative businesses. These artisans, crafts, manufacturers, and tech prototyping companies help create a more diversified and resilience local economic ecosystem for the city, region and state.	N	We agree.	None		
589	Creative Enterprise Zone	Land Use	Maker spaces strengthen the economic ecosystem through the bridge they create between higher education and industry, a crucial gap that needs to be addressed for talent retention and introducing new career paths in industrial sectors. Maker spaces are also a gateway to entrepreneurship and skill development, growing skills for Saint Paul citizens to enter high-paying industrial jobs – but also to create wealth and local ownership of businesses.	N	The Minneapolis policies referenced are covered byLU-6, LU-47, LU-49, WR-2, WR-3 and WR-4. Additionally, St. Anthony Park CEZ and Towerside efforts are supported by Land Use implementation items 16, 17 and 18.	None		
590	Creative Enterprise Zone	Land Use	Fostering the businesses that cluster in and around maker spaces will create transition users between niche and traditional industrial jobs, grow skills starting at earlier ages, and produce spin-off and supporting businesses needed by traditional and nontraditional industry alike. Ultimately maker spaces stand for an equitable approach to industrial economic development. They provide an enabling environment for manufacturing businesses creating middle-class jobs and partner with the local community to ensure access to those opportunities.	N	Noted	None		

591	Creative Enterprise Zone	Land Use	We support the recommendations offered in the Towerside letter of comments suggesting two additions to the plan including City of Saint Paul’s Resolution 15-1399 (Aug. 5, 2015), which supported the establishment of the University Avenue Innovation District, now known as Towerside Innovation District, and encouraged Saint Paul’s Planning and Economic Development Department and other city staff to participate in the partnership, supporting mutual efforts to create jobs, green space, and a cohesive district identity and brand.	N	This work is underway.	None		
592	Creative Enterprise Zone	Land Use	The Towerside suggestions echo Saint Anthony Park Community Council’s comments regarding the desired redevelopment of industrial areas and the need to include action steps similar to those set out in Policy 3: “Production and Processing” and Policy 98: “Innovation Districts” of the Minneapolis Comprehensive Plan.	N	The Minneapolis policies referenced are covered by LU-6, LU-47, LU-49, WR-2, WR-3 and WR-4. Additionally, SAP CEZ and Towerside efforts are supported by Land Use implementation items 16, 17 and 18.	None		
593	Creative Enterprise Zone	Land Use	The proposed ten-year plan for Saint Anthony Park calls for a new zoning overlay district across Towerside Innovation District and the Creative Enterprise Zone to encourage a variety and density of uses. This would include flexible zoning that will promote businesses including 21st Century urban manufacturing, innovation centers, and creative, co-working, artisanal, and maker spaces. This would also facilitate opportunities for arts and creative spaces, cultural hubs, as well as live/work arrangements in appropriate circumstances.	N	Existing zoning allows these uses.	None		
594	Creative Enterprise Zone	Land Use	We urge increased requirements for district systems that conserve our resources (water, energy) and renovate and build to highest and flexible uses including solar and other renewable energies, district systems, and building with an eye toward adaptability.	N	This is supported by the Water Resources Management chapter.	None		
595	Towerside Innovation District	Land Use	On behalf of the board of directors of Towerside Innovation District, I am pleased to provide you with two suggested changes to the Saint Paul 2040 Comprehensive Plan. Please consider this letter our official recommendation to add an “Innovation District” and “Production and Processing” policies. Such a policy will establish and support Innovation Districts to employ district-scale infrastructure and systems and to implement flexible policies and practices to allow for experimentation and innovation consistent with the City’s most ambitious goals.	N	The Minneapolis policies referenced are covered by LU-6, LU-47, LU-49, WR-2, WR-3 and WR-4. Additionally, SAP CEZ and Towerside efforts are supported by Land Use implementation items 16, 17 and 18.	None		
596	Towerside Innovation District	Land Use	This will advance the City of Saint Paul’s Resolution 15-1399 (Aug. 5, 2015), which supported the establishment of the University Avenue Innovation District, now known as Towerside Innovation District, and encouraged Saint Paul’s Planning and Economic Development Department and other city staff to participate in the partnership, supporting mutual efforts to create jobs, green space, and a cohesive district identity and brand.	N	This work is underway.	None		

597	Towerside Innovation District	Land Use	Our suggestions echo Saint Anthony Park Community Council’s comments regarding the desired redevelopment of industrial areas for 21st Century business, and the need to include action steps similar to those set out in Policy 3: “Production and Processing” and Policy 98: “Innovation Districts” of the Minneapolis Comprehensive Plan. A copy of each policy is enclosed. This would include flexible zoning over one-size-fits-all.	N	The Minneapolis policies referenced are covered by LU-6, LU-47, LU-49, WR-2, WR-3 and WR-4. Additionally, SAP CEZ and Towerside efforts are supported by Land Use implementation items 16, 17 and 18.	None		
598	Towerside Innovation District	Land Use	The proposed ten-year plan for Saint Anthony Park calls for a new zoning overlay district across Towerside Innovation District and the Creative Enterprise Zone in order to encourage a variety and density of uses.	N	See Land Use Implementation Item 16	None		
599	Towerside Innovation District	Land Use	This would promote businesses including 21st Century urban manufacturing, innovation centers, and creative, coworking, artisanal, and maker spaces. This would also facilitate opportunities opportunity for arts and creative spaces, cultural hubs, as well as live/work arrangements in appropriate circumstances.	N	Noted	None		
600	Towerside Innovation District	Land Use	These important strategies for job creation and job density along major public transit promotes the City of Saint Paul’s and Towerside’s core values of resilience, climate protection, and equity.	N	Noted	None		
601	Shannon O'Toole	Land Use	As to jobs, the failure to identify means to support and enhance small business in the city is a serious omission.	N	That level of detail is typically addressed in the City's Economic Development Action Plan.	None		
602	Jessa Anderson- Reitz	Land Use	We should follow the Minneapolis 2040 plan and relax government restrictions on multi-family housing throughout the city and eliminate parking requirements.	N	Policy LU-33 and LU-34 regarding multi-family housing. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	None		
603	Jessa Anderson- Reitz	Land Use	Higher population densities will make it financially practical to add more numerous and frequent transit options, making it more practical for St. Paulites to live without a car.	N	We agree.	None		
604	Jessa Anderson- Reitz	Land Use	Higher population density will enable more local businesses to flourish.	N	We agree.	None		
605	Jessa Anderson- Reitz	Land Use	More people walking and taking transit will mean better public health, a stronger sense of community, and the greater public safety that results from more “eyes on the street.”	N	We agree.	None		
606	Jessa Anderson- Reitz	Land Use	A more population-dense St. Paul will be more environmentally sustainable, and more economically resilient to the effects of climate change.	N	We agree.	None		
607	Jessa Anderson- Reitz	Land Use	LU-7 is very vague. The city should broadly upzone and allow multi-family housing without parking minimum throughout the city.	N	LU-7 is intended to be general to support ongoing flexibility and updates to land controls. Other policies support increasing density.	None		

608	Jessa Anderson-Reitz	Land Use	LU-13 should “eliminate” parking minimums rather than “reduce” them. Parking minimums inherently favor automobiles as a mode of transportation, burdening business owners and housing developers with additional costs that are passed to consumers and residents, and undermining the possibility of St. Paul being a transit-friendly, walk-able community.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to "overall." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
609	Jessa Anderson-Reitz	Land Use	LU-28 should be deleted. Transitions in building height harm no one, whether they are gradual or sudden. This policy would only be used to block development which is deemed too dense.	Y	Noted	Delete "gradually"		
610	Jessa Anderson-Reitz	Land Use	LU-33 should not just “encourage” medium-density housing, but “allow by right.”	Y	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	Change Policy LU-33 "Encourage" to "Provide for."		
611	Jessa Anderson-Reitz	Land Use	LU-50 This policy is vague. College neighborhoods should be upzoned to provide sufficient rental housing for students in the immediate vicinity. The current Student Housing Neighborhood Impact Overlay District should be eliminated.	N	Noted	None		
612	Jessa Anderson-Reitz	Land Use	The plan should do more to clarify and specify how much density would be allowed in Neighborhood Nodes, and allow significant increases over the existing limits.	N	Density table is provided in Figure LU-4. The Comp Plan would support rezoning that fits within these density ranges.	None		

613	Jessa Anderson-Reitz	Land Use	Stations along current and planned transit lines (the Riverview Corridor, the A Line BRT, and future BRT Lines) should automatically be upgraded to Neighborhood Nodes.	Y	Nodes are located at all transit stops other than A Line, due to there being no station area plans along the A Line.	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Snelling-St. Clair and Snelling-Minnehaha.		
614	Jessa Anderson-Reitz	Land Use	More Neighborhood Nodes should be added throughout the city, particularly in Highland, Macalaster-Groveland, and Summit Hill, where they are conspicuously few in the current draft. Examples: Grand- Cleveland, Grand-Snelling, Grand-Hamline, Grand-Lexington, St. Clair- Fairview, St. Clair-Snelling, St. Clair-Hamline, St. Clair-Lexington, Randolph-Cleveland, Randolph-Fairview, Randolph-Hamline, Randolph-Lex, Snelling-Ford, Hamline-Ford, Marshall-Fairview, Marshall-Snelling, Selby-Fairview, Selby-Victoria, Hamline-Thomas, Fairview-Minnehaha, Maryland-Rice, Arlington-Rice.	Y	OK	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Selby-Milton; Snelling-St. Clair; Snelling-Minnehaha; E 7th- Payne; Arcade-Case; Arcade-Maryland; White Bear-Minnehaha; White Bear-Suburban; Cook-Phalen.		
615	Kody Sherlund	Land Use	I think the city needs to focus on a handful of themes to achieve this vision: 1) Human-scale, ground-level development that encourages non-auto modes of transportation, like walking, cycling, scooters, buses, street cars, etc.	N	The 2040 Comp Plan supports this.	None		
616	Kody Sherlund	Land Use	As the city (and Minneapolis) continues to grow, density and efficiency will be key.	N	We agree.	None		
617	Kody Sherlund	Land Use	Increasing the viability of these features (like walkability) improve quality of life, safety, and the success and vibrancy of local businesses.	N	We agree.	None		

618	Kody Sherlund	Land Use	<p>This leads me to my second point: 2) Affordability must come with increasing demand to live in the city. Simply put, supply must keep up with demand, particularly with housing. The single most effective way the city can influence increasing the supply of housing is to change zoning laws (allow for duplexes, triplexes, townhomes, and the "missing middle" in general) and to promote infill without minimum parking requirements.</p>	Y	<p>The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.</p>	<p>Change Policy LU-33 "Encourage" to "Provide for."</p>		
619	Kody Sherlund	Land Use	<p>If mandatory parking spaces must come with development, incentivizing driving cars will continue, and valuable urban space is wasted on storing cars.</p>	y	<p>PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.</p>	<p>Edit Policy LU-13: Change "minimums" to "<u>overall</u>." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u></p>		
620	Kody Sherlund	Land Use	<p>If walking to a local grocery store is a better option than driving to the supermarket several miles away, people will do that! Let's incentivize and promote this behavior. "If you build it, they will come."</p>	N	<p>Agreed</p>	<p>None</p>		
621	Scott Berger	Land Use	<p>I'm writing in favor of increased density throughout the great City of Saint Paul.</p>	N		<p>None</p>		

622	Scott Berger	Land Use	I would like to see a plan at least as ambitious as Minneapolis's, where landowners have greater freedom to build multi-unit dwellings in traditionally single-family districts, and where increased housing--both affordable and market rate--permeates the city, leading to more neighbors and more diverse neighbors.	Y	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	Change Policy LU-33 "Encourage" to "Provide for."		
623	Jeff Zaayer	Land Use	LU-1 Would benefit from a change to the zoning code particularly regarding minimum floor to area ratio for T1 and T2 zoning. As currently The Snelling Ave corridor is seeing 2 new strip malls being built by right under zoning code and there is also a new strip mall that was completed 2 years ago. All 3 of these buildings have less than a 0.6 FAR.	N	Noted. Review of T zoning dimensional and design standards is currently in the Planning Team's workplan.	None		

624	Jeff Zaayer	Land Use	LU-6 calls for "growing Saint Paul's tax base in order to maintain and expand city service amenities and infrastructure" However policies such as LU1 and LU-6 seem to limit this growth by restricting high density development to certain isolated areas and valuing the preservation of "significant public views" over accommodating basic needs such as housing. I support growing our tax base and making room for everyone who wants to live in Saint Paul and I would like to see the comp plan enable this by allowing denser development across the city by allowing ADUs, duplexes, triplexes, and fourplexes citywide. We need to be bold in our policy implementation to ensure that we are growing the tax base without placing additional pressure on those who can't afford the rent increases caused by the housing scarcity that we are currently experiencing.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	None		
625	Jeff Zaayer	Land Use	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.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to "overall." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
626	Jeff Zaayer	Land Use	Policy LU-22 calls for " strengthening neighborhood connections to and within downtown Saint Paul through development and improvements that support and complement Downtown businesses and urban villages" A primary factor that limits connectivity between downtown and surrounding neighborhoods is the freeways and river that surround it. Though land use can partially address this disconnect, it would be better addressed by specific walking and bicycling improvements on routes into and out of downtown such as those identified in the city's bike plan and transportation chapter.	N	We agree.	None		

627	Jeff Zaayer	Land Use	Policy LU-34 calls for "providing for multi family housing along arterial and collector streets to facilitate walking and leverage the use of public transportation" Given the public health impacts of exposure to particulate pollution caused by vehicles, as well as the effects of long term exposure to noise that interrupts sleep, I believe that multi family housing should not be exclusively promoted along busy corridors such as Marshall and Snelling Avenues. Because people of color and low income people as well as other underrepresented groups live in multi family housing at far higher rates than white and higher income people. Focusing multi family housing development near noisy, polluted roads while preserving quiet neighborhoods with clean air for those who can afford single family homes is a massive equity issue. I would like to see the comp plan provided for not only along arterial and collector streets but across the city. In addition to equity benefits, this would allow for the density needed to support walkability and high quality public transportation.	Y	Increasing housing along transit routes is the most efficient way to use land, and it allows the city to grow without overloading streets with automobiles. Additionally, it allows people to reduce their overall cost of living (since they do not need to own a car), which increases affordability. Some studies have shown increased health impacts along highways and 4-lane roads. However, this policy is not implemented in isolation. There are other trends and policies that influence health, such as cleaner and quieter vehicles, improving walkability.	Change Policy LU-34 to "Provide for multi-family housing along arterial and collector streets, <u>and in employment centers</u> to facilitate walking, access to jobs and the use of public transportation."		
628	Jeff Zaayer	Land Use	Another Land use policy that is not addressed in this section is that of charter schools. In the last decade there has been an explosion of charter schools opening all over the city and often taking valuable industrial properties and making them tax exempt in addition to putting school aged children in an area that has a higher proximity to hazardous material sites, industrial areas often lack sidewalks and other safe route to school infrastructure that help encourage children to arrive to school in ways other than in a passenger vehicle. Also charter schools serve to further segregate our schools and increase disparities in our community. Perhaps limiting the number of schools by ward based on childhood population?	N	This is provided for in the Plan. See Policies LU-42, LU-43, LU-44, LU-37 & LU-38.	None		
629	Cory Zwiefelhofer	Land Use	1. Not clearly defining that the reduction in use of cars with respect to land use, transportation, and housing is one of the primary goals St. Paul needs to move to in 2040;	N	A better balance between transportation modes, more efficient use of land and more housing choice are fundamental values that underlie the vision, goals and policies in the 2040 Comprehensive Plan.	None		
630	Cory Zwiefelhofer	Land Use	2. Eliminating parking minimums altogether needs to become public policy;	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to "overall." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		

631	Cory Zwiefelhofer	Land Use	3. Fixating on allowing higher densities only near arterial roads does nothing if that density is not mixed throughout neighborhoods as well. The best neighborhoods have density and diversity of people, businesses, churches, parks, and other uses of a city. In addition, many of St. Paul's arterial roads need road diets before density were to occur on them; by discouraging pedestrian traffic, St. Paul is actively working against the vibrancy of a neighborhood.	N	The intent is to increase the housing supply in a way that leverages transit, because it is the most efficient in terms of land use and allows the City to grow without overloading streets with automobiles. Additionally, access to transit allows people to reduce their overall cost of living, providing more income to cover housing costs. The Plan does not support higher densities only along arterials. There are policies in the Urban Neighborhoods section that also support more subtle increases in density (e.g. through accessory dwelling units).	None		
632	Cory Zwiefelhofer	Land Use	4. Explicitly calling out removing existing parking lots in favor of establishing homes and businesses.	N	Comment acknowledged	None		
633	Cory Zwiefelhofer	Land Use	7. Development opportunities should not just be focused on "neighborhood nodes."	N	They aren't. Policies allow development throughout the city.	None		
634	Jake Reuter	Land Use	Parking minimums should be eliminated from Saint Paul's zoning code. Establishing artificial floors on the number of parking spaces that a development must provide increases the cost of development and ultimately rent or businesses and residents, regardless of whether or not they need the parking.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall</u> ." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
635	Jake Reuter	Land Use	More "nodes" should be added to the map, especially where two transit lines meet or there is existing streetcar-style commercial development. These nodes are what make Saint Paul an exciting and walkable place to live!	Y	OK	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Selby-Milton; Snelling-St. Clair; Snelling-Minnehaha; E 7th-Payne; Arcade-Case; Arcade-Maryland; White Bear-Minnehaha; White Bear-Suburban; Cook-Phalen		

636	Jake Reuter	Land Use	Saint Paul should follow the lead of Minneapolis and eliminate single-family exclusive zoning. Triplexes should be allowable anywhere in our city.	Y	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	Change Policy LU-34 to "Provide for multi-family housing along arterial and collector streets <u>and in employment centers</u> to facilitate walking, access to jobs and the use of public transportation."		
637	Philip Bussey	Land Use	I think this comprehensive plan should recognize the negative impact that exclusively zoning for single family homes has done to our city and allow for multi family dwellings throughout the entire city, increase where mixed-use buildings are allowed, and remove parking minimums.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall</u> ." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
638	Nicholas Rossini	Land Use	Also density all over needs to be heightened, especially along all transit routes and not just at certain nodes of city.	N	Several policies support increased density city-wide, including LU-1, LU-2 and LU-33. While higher-density development should be directed along transit corridors, incremental increases in density are supported throughout Urban Neighborhoods, which is the bulk of the city.	None		

639	Brendan O'Shea	Land Use	The size and number of neighborhood nodes should be expanded to allow for greater mixed-use density in commercial corridors. Increased density up to a half mile from the center of the node would be preferable.	Y	The node symbol does not indicate the literal size of the NN. The size will be dictated by adopted plans, context and market.	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Selby-Milton; Snelling-St. Clair; Snelling-Minnehaha; E 7th-Payne; Arcade-Case; Arcade-Maryland; White Bear-Minnehaha; White Bear-Suburban; Cook-Phalen.		
640	Brendan O'Shea	Land Use	Neighborhood nodes that align with A Line stations, such as Snelling/Minnehaha, should be included.	Y	Not all A Line stations were included because of stop frequency and because there are no station area plans for the stops.	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Snelling-St. Clair and Snelling-Minnehaha.		
641	Brendan O'Shea	Land Use	The land use section describes the need to balance the needs of commerce with adjacent land use: "It is important to provide for [commercial transport] uses while ensuring minimum negative external impacts to adjacent land uses." Policy LU-53 addresses the mitigation of negative effects of highways. LU-54 or a related policy should similarly address the mitigation of negative effects of freight and intermodal operations, particularly in those areas (such as near Newell Park) where the encroachment has been of freight and intermodal uses upon residential areas rather than the opposite as the text of LU-54 implies.	Y	OK	Add new Transportation policy: LU-XX. <u>Provide for transportation uses while ensuring minimum negative external impacts to adjacent land uses.</u>		
642	KL	Land Use	I support the following additions to the city's plan: 1) creative policies to stop the negative impacts of gentrification on residents and small businesses such as limits on how much rent can increase to protect affordable housing and commercial spaces for businesses (such as New York City's rent control)	Y	LU-4 addresses this as a matter of policy, but more detail on how to limit displacement could be part of a city-wide Economic Development Strategy.	Include in Economic Development Strategy implementation item.		
643	Kathryn Noble	Land Use	St. Paul is currently very car-centric with single use parking lots and street parking, which makes for very inefficient and costly use of valuable space.	Y	Noted	Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
644	Kathryn Noble	Land Use	The city needs to limit or completely eliminate "drive thrus" within city limits (Starbucks on Marshall/Snelling and a proposed Dunkin Donuts at Hamline and Larpenteur, rejected rightly by the city).	N	A study of drive-thrus is already in the Work Program for the Planning Team in PED.	None		
645	Kathryn Noble	Land Use	Other suggestions are to consider the possibility of alleyway and sidewalk snow removal, idling vehicle bans in residential areas, traffic calming measures in urban arteries (Larpenteur, Energy Park, Rice being chief culprits), prioritizing multimodal transportation (including bikeshare which is very disappointing at the moment), organic recycling collected at the alleyway, and more mixed use developments at key areas.	N	Comment acknowledged	None		
646	Kathryn Noble	Land Use	The departure of businesses from Downtown is also a key area of concern and the city needs to do a lot more to spur business/residential development in the downtown core.	N	Noted	None		

647	Michael Healy	Land Use	<p>The plan looks great except for one major flaw. It needs to be amended to call for the elimination of minimum off-street parking requirements, at least for commercial and industrial businesses and possibly some types of residential development as well. The policy goal could be formatted as something along the lines of "The City will eliminate minimum parking requirements for commercial and industrial properties and explore the elimination or reduction of minimum parking requirements for residential properties."</p>	Y	<p>It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.</p>	<p>Edit Policy LU-13: Change "minimums" to "<u>overall</u>." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u></p>		
648	Michael Healy	Land Use	<p>The usefulness of minimum parking requirements has been thoroughly debunked and they have very little support these days from anyone who takes the issue seriously. The requirements are even starting to lose support in rural areas and amongst conservatives, despite their "pro-car" attitudes, because minimum parking requirements are anti-business and flat-out don't work well. Minimum parking requirements represent an unnecessary and heavy-handed "big government" intervention into the marketplace which attempts to solve a problem that doesn't even exist. Most businesses that need parking are going to build parking as they won't be able to get bank financing otherwise. Developers will build the type of parking that they need to build to keep their tenants happy. The free market will figure parking out and 99% of the time will do a better job than the zoning code's arbitrary parking requirements. Cities kill or hurt good projects all the time by making an arbitrary determination that "there isn't enough parking." The business then either has to try to get a variance (costly, time-consuming, and prone to sabotage by neighborhood groups and other businesses) or has to buy up neighboring properties to bulldoze them and put up more parking. More often than not, this results in an oversized parking lot that sits at least partially empty most of the time. Also, the City loses the tax base from the buildings that had to be bulldozed to create the parking.</p>	Y	<p>It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.</p>	<p>Edit Policy LU-13: Change "minimums" to "<u>overall</u>." Add City-wide Policy LU-XX. Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</p>		
649	Michael Healy	Land Use	<p>Parking costs of lot of money to build. Building unnecessary extra parking stalls (surplus stalls built just to please the City) drives up the cost of development. Structured parking generally ends up costing somewhere between \$20,000-\$30,000 per parking stall. Surface parking is cheaper (but still not cheap) but it eats up a ton of land and makes a neighborhood uglier and less walkable. Nobody wins when there is "too much" parking, both the property owner and the City are losers in that situation. It doesn't seem reasonable to talk about wanting development and housing to be "affordable" but then turn around and impose unnecessary mandates that drive up development costs and make everything less affordable. Developers are going to build parking if their project needs parking. There's no benefit in having the City require even more parking beyond what the free market is already providing, especially when our stated goal is encouraging people to drive less and consider using transit or active transportation.</p>	N	<p>PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.</p>	<p>None</p>		

650	Michael Healy	Land Use	Minimum parking requirements have caused immense harm to American cities since their widespread adoption in the 1960's. None of Saint Paul's most interesting/walkable neighborhoods would be allowed to be built today because of minimum parking requirements. Selby/Dale, Grand Avenue, Snelling/Selby, and all of the cute little streetcar nodes fail to have "enough" parking under the code and would not be allowed to be built in 2018.	N	PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	None		
651	Michael Healy	Land Use	It would be a huge missed opportunity if we failed to include this goal in our 2040 plan. Honestly, I don't think its possible to achieve any of the other goals regarding walkability, housing affordability, increased transit usage, etc. if this issue isn't addressed. By 2040, most cities aren't going to have minimum parking requirements, everything is moving in that direction. Saint Paul has an opportunity to be a leader in this. Please, let's get some language in our comprehensive plan!	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall</u> ." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
652	Vicky Adams	Land Use	Living on the east side of St Paul for 14 years and have worked downtown I'm leery of the plan to increase density with no regards to single family home owners like myself and those of my neighbors.	N	Saint Paul needs to grow. The major impact of this plan for single-family home owners will be creating more destinations within walking distance of their homes.	None		
653	Vicky Adams	Land Use	We already have many rental units both duplexes and triplexes and it hasn't been good with more crime and more traffic and rental costs have not been lowered or stable.	N	Noted	None		
654	Vicky Adams	Land Use	We have much diversity already with working class folks who will see no upside to just jamming more people in already extremely close proximity to one another!	N	Noted	None		
655	Kristina Kliber	Land Use	How does the proposed plan impact the current Student Housing Overlay District that was enacted in 2012? Specifically, what is included in the 2040 Comprehensive Plan to prevent absentee-landlord owned single-family student rental homes from being converted into duplexes and triplexes? Increasing the number of college students living in an already densely populated part of Saint Paul will lead to a tipping point where college students outnumber other renters and homeowners leading to a vastly different quality of life.	N	The Student Overlay District is still in place.	None		
656	Keith Koch	Land Use	I understand that more density and population are needed to help our city's economy, reduce greenhouse emissions and leverage infrastructure; but I also believe that a balanced approach that respects the integrity of existing home-owners, neighborhood character and scale are important to consider in the plan.	N	Comment acknowledged	None		

657	Keith Koch	Land Use	In my opinion, examples of where the city has lost sight of the balance are the re-zoning of Marshall Avenue and the consideration of removing the student-housing overlay around St. Thomas campus. Both of these situations will have an irreparable impact on existing neighborhoods and the home-owners in those areas, it will be years before we understand the development to come and the consequences of the changes allowed in those areas.	N	Noted	None		
658	Michael Kuchta	Land Use	I want to bring to your attention a couple of omissions: Page 33: A reminder that both the District 6 and District 10 boards have requested that the Como/Front/Dale area be designated an "opportunity site," not merely a "neighborhood node."	Y	OK	Add Opportunity Site at Como/Front/Dale		
659	Jake Reilly	Land Use	Map LU-5 community designation must be revised to show the city in context with surrounding communities and the plan must state somewhere (anywhere. On the map. In the text. Somewhere.) that the minimum residential density for an Urban Center is 20 units per acre, in order to meet the minimum requirements outlined in the Checklist of Minimum Requirements provided by the Metropolitan Council.	Y	Density table, including Urban Center, is provided in Figure LU-4.	Revise Map LU-5 to show the Thrive MSP 2040 designation for Saint Paul in its regional context.		
660	Jake Reilly	Land Use	I encourage the planning commission to request staff evaluate how to best incorporate a policy or an element of the implementation plan in the land use chapter that examines how to collaborate or coordinate or support efforts to move the 1,000s of people who are not participating the labor force at all to move into the workforce. Whether that's collaborating with the County's Workforce Investment Board; speaking with staff at DEED and MMB about the Connect 700 program (a program that moves people with disabilities back into the workforce, specifically in government positions); collaborating with folks working on moving those with incarceration histories back into the workforce; or collaborating with the trades and the educational institutions the Mayor and Director Turner have been building relationships with in order to match those businesses seeking resources from the HRA or PED with those who are unemployed, underemployed, or just under the radar. Many of our employers could solve their workforce shortage issues with those already living here in Saint Paul. This is an equity issue. It is also a human rights issue.	N	Comment acknowledged. Too specific for the Comprehensive Plan, but could be part of a next-step Economic Development Strategy.	None		
661	Alicia Valenti	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.	N	Several policies support increased density city-wide, including LU-1, LU-2 and LU-33. While higher-density development should be directed along transit corridors, incremental increases in density are supported throughout Urban Neighborhoods, which is the bulk of the city. Policy LU-11 protects view generally from public streets and parks, and will not preclude the development of housing or any other use on private property.	None		

662	Alicia Valenti	Land Use	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.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall</u> ." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
663	Alicia Valenti	Land Use	Policy LU-34 calls for “[providing] for multi-family housing along arterial and collector streets to facilitate walking and leverage the use of public transportation.” Given the public health impacts of exposure to particulate pollution caused by cars, as well as the effects of long-term exposure to noise that interrupts sleep, I believe that multi-family housing should not be exclusively promoted along busy corridors such as Marshall and Snelling avenues. Because people of color, people with low incomes and other traditionally underrepresented groups live in multi-family housing at far higher rates than white people and people with high incomes, focusing multi-family housing development near noisy, polluted roads while preserving quiet neighborhoods with clean air for those who can afford single-family homes is a massive equity issue. I would like to see the comp plan provided for not only along arterial and collector streets, but across the city. In addition to equity benefits, this would allow for the density needed to support walk-ability and high-quality public transportation.	N	Several policies support increased density and housing diversity city-wide, including LU-1, LU-2, LU-33 and LU-34. While higher-density development should be directed along transit corridors, incremental increases in density are supported throughout Urban Neighborhoods, which is the bulk of the city.	None		
664	Alicia Valenti	Land Use	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.	N	Several policies support increased density and housing diversity city-wide, including LU-1, LU-2, LU-33 and LU-34. While higher-density development should be directed along transit corridors, incremental increases in density are supported throughout Urban Neighborhoods, which is the bulk of the city.	None		
665	Kathy Sidles	Land Use	1. Saint Paul and other cities long range development plans could include no loss of green space and higher density development on already paved/developed areas.	N	Saint Paul already has a "no net loss" policy for park space in its City Charter. The Land Use chapter supports higher-density in several policies.	None		
666	Stuart and Mary Ellen Knappermiller	Land Use	We need affordable housing and an increase in density and better transit.	N	We agree/	None		

667	Stuart and Mary Ellen Knappermiller	Land Use	Our corridors should have apartments with first floor businesses that people will use, not the development at the intersection of Arcade and Maryland where a one story building stands mostly empty because there isn't enough slow car traffic/foot traffic/bike traffic to support a bike shop, etc. These buildings need to be LEED certified with rain capture for graywater use and solar on the roof.	N	Comment acknowledged	None		
668	Stuart and Mary Ellen Knappermiller	Land Use	My wife and I need clear sidewalks to walk the mile plus to Mississippi Market or to businesses on Payne, as you can't afford to have us drive a combustion engine car and we don't want to use the bus as it doesn't get us the exercise that will keep us paying taxes for several more decades.	N	Comment acknowledged	None		
669	Stuart and Mary Ellen Knappermiller	Land Use	We need to connect as citizens to make our parks and water and homes and businesses places of vibrancy, especially because our daughter in law says she fits in better walking at Phalen than her Euro-American in laws do.	N	Comment acknowledged	None		
670	Michael Sonn	Land Use	We should be discussing eliminating parking minimums city-wide.	y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
671	Michael Sonn	Land Use	There should dozens of more neighborhood nodes.	Y	OK	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Selby-Milton; Snelling-St. Clair; Snelling-Minnehaha; E 7th-Payne; Arcade-Case; Arcade-Maryland; White Bear-Minnehaha; White Bear-Suburban; Cook-Phalen.		

672	Michael Sonn	Land Use	There should be a blanket tri-plex allowance anywhere in the city, no matter the zoning.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	None		
-----	--------------	----------	--	---	---	------	--	--

673	Michael Sonn	Land Use	<ul style="list-style-type: none">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.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	None		
674	Michael Sonn	Land Use	<ul style="list-style-type: none">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.	y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall</u> ." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
675	Michael Sonn	Land Use	<ul style="list-style-type: none">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.	N	Comment acknowledged	None		

676	Michael Sonn	Land Use	<ul style="list-style-type: none">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.	N	The intent is to increase the housing supply in a way that leverages transit. This is the most efficient way to use land, and it allows the City to grow without overloading the streets with automobiles. However, there are also policies under Urban Neighborhoods (LU-33 and LU-34) that support multi-family housing in other parts of the city. The Transportation chapter emphasizes racial and social equity as a top priority when choosing which transportation projects to fund.	None		
677	Michael Sonn	Land Use	<ul style="list-style-type: none">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.	N	Several policies support increased density and housing diversity city-wide, including LU-1, LU-2, LU-33 and LU-34. While higher-density development should be directed along transit corridors, incremental increases in density are supported throughout Urban Neighborhoods, which is the bulk of the city.	None		
678	Andrew Singer	Land Use	Finally, for the plan overall, (including the transportation chapter) there should be some policy point that the city will seek to: “Work with state and county governments to overcome legal issues that create food and service ‘deserts’, where food and basic services are not within walking distance of a given neighborhood. These issues include bank redlining and restrictive lease clauses for grocery stores, lumber yards and other services that require specialized buildings.”	N	The is addressed in LU-15.	None		
679	Andrew Singer	Land Use	Lack of groceries diminishes the “livability” of a neighborhood. In acknowledgement of this, Saint Paul went to great expense to build the Penfield Apartments and bring a grocery store into downtown. Meanwhile, when Whole Foods left its store location at Fairview and Grand, no other grocery stores could move into the site because of a restrictive lease clause. With the eviction of Mississippi Market from Randolph and Fairview by Saint Paul Academy, an entire neighborhood is no longer within walking distance of a grocery store. It now takes up to forty minutes of walking and two miles to reach one, which is more than most people are willing or able to do. Another example is the Home Depot in Cottage Grove, which left the town with a restrictive lease clause, no lumber yard and a vacant property.	N	Comment acknowledged	None		

680	Andrew Singer	Land Use	Grocery stores or lumber yards require specialized buildings with loading docks, large refrigerators, and large square footage. Given that many of our neighborhoods have a limited supply of such buildings, and given that groceries and building supplies are basic necessities for a functioning neighborhood (and city), the state legislature could end restrictive lease clauses for grocery stores and certain other classes of retail goods and services. The Comprehensive Plan should state that the city will work towards this end.	N	Comment acknowledged	None		
681	Peter Berglund	Land Use	In support of 2040 Comp Plan Transportation Goal No. 4 to shift away from single-occupant vehicles: (Limit parking and you limit cars) If new development brings more housing but doesn't limit the number of new cars, we're going to have more serious traffic congestion. As I understand the city's policies, a new apartment building must provide a minimum of off-street parking spaces. While increased density is good for mass transit, if more density brings more cars, the buses won't be able to function on streets choked with cars. Some say put the new multifamily housing at major intersections to better connect with transit. However, new apartment buildings may result in the same number of cars regardless of their location.	N	Comment acknowledged	None		
682	Peter Berglund	Land Use	My proposal is to eliminate the city's minimum off-street parking requirement for new multifamily housing and replace it with a maximum off-street parking requirement. Residents living in the new multifamily housing would not get permits to park on the street, of there would be only a limited number of permits issued. Existing area residents would be granted parking permits. Permit parking program costs could be paid for with fines for violators. And if the city is making so much more in property taxes, this would help offset the administration of a permit parking program.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
683	Peter Berglund	Land Use	Senior citizens, college students and many young adults are happy to live without cars, so there should be a market for such housing. We've been told at a meeting on the Ford site that it can cost \$10,000 or more for each parking stall within a multifamily apartment building. If the developers can reduce the number of parking stalls, these savings could be passed on to the new tenants.	N	Comment acknowledged	None		
684	Payne-Phalen Community Council	Land Use	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)	Y	OK	Add Opportunity Site at Payne-Phalen		
685	Payne-Phalen Community Council	Land Use	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.	N	Comment acknowledged	None		
686	Payne-Phalen Community Council	Land Use	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.	Y	OK	Change "large redevelopment sites" to " <u>Opportunity sites</u> " on page 8		

687	Payne-Phalen Community Council	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 serving 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:	N	Comment acknowledged	None		
688	Payne-Phalen Community Council	Land Use	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.	Y	This chapter is organized a bit differently, but we thought it made more sense to focus policy by land use category rather than goal.	Add appendix table with policy numbers organized under goals as reference.		
689	Payne-Phalen Community Council	Land Use	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.	N	Comment acknowledged	None		
690	Payne-Phalen Community Council	Land Use	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.	N	Comment acknowledged	None		
691	Payne-Phalen Community Council	Land Use	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.	N	Comment acknowledged	None		
692	Payne-Phalen Community Council	Land Use	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.	N	Comment acknowledged	None		

693	Payne-Phalen Community Council	Land Use	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 Metro Transit. 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.	Y	Agree with the need for a comprehensive Economic Development Strategy, and for it to be informed by the City's Racial Equity Plan.	Add a short-term item to the Implementation chapter under Land Use: <u>Initiate a city-wide, comprehensive equitable economic development strategy. It should include local-scaled topics, such as Neighborhood Nodes, as well as regional issues, such as transit and workforce development.</u>		
694	Payne-Phalen Community Council	Land Use	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.	N	Comment acknowledged	None		
695	Payne-Phalen Community Council	Land Use	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.	Y	Agree with the need for a city-wide comprehensive Economic Development Strategy, and for it to be informed by the City's Racial Equity Plan.	Add a short-term item to the Implementation chapter under Land Use: <u>Initiate a city-wide, comprehensive equitable economic development strategy. It should include local-scaled topics, such as Neighborhood Nodes, as well as regional issues, such as transit and workforce development.</u>		
696	Payne-Phalen Community Council	Land Use	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.	N	Comment acknowledged	None		

697	Payne-Phalen Community Council	Land Use	<p>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.</p>	N	Comment acknowledged	None		
698	Payne-Phalen Community Council	Land Use	<p>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.</p>	N	T-27 in the Transportation chapter supports this.	None		
699	Payne-Phalen Community Council	Land Use	<p>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.</p>	Y	Agree with the need for a city-wide comprehensive Economic Development Strategy, and for it to be informed by the City's Racial Equity Plan.	Add a short-term item to the Implementation chapter under Land Use: <u>Initiate a city-wide, comprehensive equitable economic development strategy. It should include local-scaled topics, such as Neighborhood Nodes, as well as regional issues, such as transit and workforce development.</u>		
700	Payne-Phalen Community Council	Land Use	<p>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.</p>	Y	OK	Add text to Economic Development bullet in TOD sidebar, p. 29		

701	Payne-Phalen Community Council	Land Use	The 1990s definition of TOD is often shorthand 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.	N	Comment acknowledged	None		
702	Payne-Phalen Community Council	Land Use	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. Pauls’ 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 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. Metro Transit will not even considering offering service if there isn’t a certain level of residential density correlated with employment density.	Y	Comment acknowledged	Change Policy LU-34 to "Provide for multi-family housing along arterial and collector streets <u>and in employment centers</u> to facilitate walking, access to jobs and the use of public transportation."		
703	Payne-Phalen Community Council	Land Use	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.	N	Comment acknowledged	None		
704	Payne-Phalen Community Council	Land Use	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.	N	Comment acknowledged	None		

705	Payne-Phalen Community Council	Land Use	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:	N	Noted	None		
706	Payne-Phalen Community Council	Land Use	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 associate disinvestment. Those nodes still have high-levels of transit service and strong residential populations. But they need infill development of 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 on Concentrated Poverty.	Y	Agree with the need for a city-wide comprehensive Economic Development Strategy, and for it to be informed by the City's Racial Equity Plan.	Add a short-term item to the Implementation chapter under Land Use: <u>Initiate a city-wide, comprehensive equitable economic development strategy. It should include local-scaled topics, such as Neighborhood Nodes, as well as regional issues, such as transit and workforce development.</u>		
707	Payne-Phalen Community Council	Land Use	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).	N	See LU-3	None		
708	Payne-Phalen Community Council	Land Use	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.	N	Noted	None		
709	Payne-Phalen Community Council	Land Use	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.	Y	OK	Add nodes at Arcade-Case and Arcade-Maryland.		

710	Payne-Phalen Community Council	Land Use	e. In addition, a node should be added at East 7th 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.	Y	OK	Add a node at E. 7th-Payne		
711	Payne-Phalen Community Council	Land Use	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.	Y	Noted. The symbol is not intended to be literal regarding size of the node.	Add disclaimer to map.		
712	Payne-Phalen Community Council	Land Use	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.	N	Comment acknowledged	None		
713	Payne-Phalen Community Council	Land Use	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:	N	Noted	None		
714	Payne-Phalen Community Council	Land Use	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.	Y	Agree	Add an Opportunity Site at Payne-Phalen.		

715	Payne-Phalen Community Council	Land Use	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 7th 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.	Y	OK	Add Opportunity Site along E. 7th between Downtown and Metro State University.		
716	Payne-Phalen Community Council	Land Use	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 those sites outside the ACP where the private market is more likely to initiate projects).	N	This is addressed in LU-3.	None		
717	Payne-Phalen Community Council	Land Use	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):	N	Noted	None		
718	Payne-Phalen Community Council	Land Use	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.	Y	OK	Add view		
719	Payne-Phalen Community Council	Land Use	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.	Y	OK	Add view		

720	Payne-Phalen Community Council	Land Use	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 and enchanted land. This view corridor should be identified, preserved and enhanced.	Y	OK	Add view		
721	Payne-Phalen Community Council	Land Use	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 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.	Y	OK	Add view		
722	Payne-Phalen Community Council	Land Use	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.	Y	OK	Add note to map		
723	Payne-Phalen Community Council	Land Use	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.	Y	OK	Add appendix table with policy numbers organized under goals as reference.		
724	Payne-Phalen Community Council	Land Use	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.	Y	Agree with the need for a city-wide comprehensive Economic Development Strategy, and for it to be informed by the City's Racial Equity Plan.	Add a short-term item to the Implementation chapter under Land Use: <u>Initiate a city-wide, comprehensive equitable economic development strategy. It should include local-scaled topics, such as Neighborhood Nodes, as well as regional issues, such as transit and workforce development.</u>		

725	Amy Gunderman (LHCC)	Land Use	The Board requests that you address the inconsistent treatment of Dunlap and Selby in the City’s draft 2040 Comprehensive Plan as compared to the Union Park District Council’s Community Plan.	Y	OK	Move Neighborhood Node at Selby-Dunlap to Selby-Milton		
726	Amy Gunderman (LHCC)	Land Use	The draft 2040 Comprehensive Plan identifies the corner of Selby and Dunlap as a “Neighborhood Node.” (The Comprehensive Plan incorrectly refers to this node as located at Selby and Milton on page 33, but accurately includes the Node on Map LU-2, according to Principal City Planner Anton Jerve.)	Y	OK	Move Neighborhood Node at Selby-Dunlap to Selby-Milton		
727	Amy Gunderman (LHCC)	Land Use	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). This language contradicts the Union Park Community Plan, which 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).	Y	OK	Move Neighborhood Node at Selby-Dunlap to Selby-Milton		
728	Amy Gunderman (LHCC)	Land Use	The language for LU1.4 was developed 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 (enclosed). Provision LU1.4 was approved by the City Planning Commission on February 23, 2018, and by City Council on April 4, 2018, as an amendment to the full Union Park Community Plan.	Y	OK	Move Neighborhood Node at Selby-Dunlap to Selby-Milton		
729	Amy Gunderman (LHCC)	Land Use	The City’s draft Comprehensive Plan does not account for the engagement work done by the Union Park District Council and by the Lexington-Hamline Community Council as it regards the intersection of Selby and Dunlap. Our shared community members expressed clear opposition to the higher-density, mixed-use development described in the draft Comprehensive Plan, as reflected in the Union Park Community Plan. The Board requests that the language at issue be removed from the City’s draft 2040 Comprehensive Plan. Thank you for your help in this matter.	Y	OK	Move Neighborhood Node at Selby-Dunlap to Selby-Milton		
730	Pat Thompson	Land Use	Increasing density of all uses to create walkability and make transit realistic for many more people, including bus shelter.	N	Noted	None		
731	Pat Thompson	Land Use	Shouldn't favor car storage over housing people.	N	Agree	None		

732	Pat Thompson	Land Use	The neighborhood nodes are a good beginning on this but there needs to be more of them especially geared to existing and projected transit.	N	The idea behind Neighborhood Nodes is to focus higher-density development in particular areas. Having too many of them defeats the purpose of focusing. LU-1 relates to directing growth to areas with the highest existing or planned transit capacity.	None		
733	Michael Russell	Land Use	The focus on equity is really important. The parks think about this, the neighborhood nodes need to think about this too.	N	Comment acknowledged	None		
734	Bill Dermody	Land Use	Add a Neighborhood Node to Map LU-2 at Cook/Phalen (just SW of Johnson/Phalen) to reflect late 2018 addition of a Rush Line station here.	Y	OK	Add node at Cook-Phalen	43	
735	Derek Thompson	Parks	I want a city with great parks and trails for recreation.	N	So do we.	None		
736	Connor Schaefer	Parks	Please consider adding a goal and/or policy on the following topics: - Reducing the negative impact of salt and pesticide. Reduce of carbon emissions from park operations - Support implementation of pop-up parks, either through a pilot project or in coordination with a partner organization. - Support development near regional parks that is dense, walkable, and has access to frequent transit service. More people need to be able to live within walking distance of regional park facilities.	N	These ideas are already covered in the Parks chapter through PR-19 (Improve the environmental sustainability and resiliency of parks through strategies such as...) and PR-6 (Use mobile recreation to fill park or recreation service gaps, enhance events, and provide quality recreation to neighborhood and community parks). In addition, the Land Use chapter (LU-31 and LU-32) calls for the creation of Neighborhood Nodes that plan for higher density and make the link between density, access, and parks and recreation.	None		
737	District 1 Land Use Committee	Parks	We request you color green the Fish Creek Open Space. This is a significant County-owned park space that is part of a larger park complex stretching into Maplewood.	N	LU/PR - Fish Creek Open Space is shown on Map P-2 as Ramsey County Parkland.	None		
738	District 1 Land Use Committee	Parks	pg. 102: We request you add a new “proposed regional trail search corridor” along the Union Pacific RR Altoona Subdivision from Johnson Pkwy to the eastern city limits to be named “Phalen - Lake Elmo” and connecting those two regional parks.	Y	Agree, would connect two regional park facilities. Rail is in active service, but identifies potential of the corridor.	Add Proposed Regional Trail Search Corridor from Lake Phalen to eastern city limits to Map P-3.	102	
739	KC Cox	Parks	I also hope that parks and green space will remain. Every space doesn't need to be "covered."	N	Comment acknowledged	None		
740	Saint Paul Parks and Recreation Commission	Parks	We must review (types) of sports and hours of operation, etc. in communities we serve.	Y	Policy PR-9 already does this, but doesn't include advancing equity as a goal.	"Use customer and resident feedback on needs, satisfaction and trends to improve park experience, <u>advance equity</u> and bring in new users."	96	

741	Saint Paul Parks and Recreation Commission	Parks	Is there a recreation and program document at each facility to ensure consistency and accountability?	N	Implementation item #12 calls for the City to "Develop a set of measurable performance standards for all Community Centers."	None		
742	Saint Paul Parks and Recreation Commission	Parks	Consider equity in programming and children that are not sports focused. What types of programming in addition to sports (related) programs is offered?	N	PR-10: "Embrace and integrate emerging cultural and recreation trends, particularly those that meet the recreational needs of youth, underserved populations and emerging resident groups."	None		
743	Saint Paul Parks and Recreation Department	Parks	Consider changing Implementation Item #8 from "Update" to "Review" since it is uncertain that updates would be necessary.	Y	Agree.	Update <u>Review</u> adopted master plans in response to for conformance with the 2040 Comprehensive Plan.		
744	Saint Paul Parks and Recreation Commission	Parks	Re: Policy PR-13-to what end? Need for more specific language (example, "to effectively represent communities..)	N	The final phrase of PR-13 reads " to maximize activity throughout the year."	None		
745	Saint Paul Parks and Recreation Commission	Parks	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.	Y	Agree that these important elements need to be identified.	Revise introduction to include Como and expand description of things beyond land and buildings (zoo, play areas, pools, golf courses).	94	
746	Saint Paul Parks and Recreation Commission	Parks	References to equitable services such as handicapped accessible facilities and gender neutral restrooms.	N	Accessibility required per ADA and June 2018 City Council-adopted resolution for gender-neutral single-stall restrooms for all City building.	None		
747	Saint Paul Parks and Recreation Commission	Parks	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	Y	Agree, provide example of Como Friends.	PR-29. Seek out partnerships with private entities, <u>such as Como Friends</u> , to finance capital and maintenance costs...	97	
748	Saint Paul Parks and Recreation Commission	Parks	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.	N	Comment acknowledged.	None		
749	Saint Paul Parks and Recreation Commission	Parks	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.	N	Agree this would help, but not possible at this time. Parks staff was consulted, but accurate data is not readily available. Can pursue if recommended by P&R Commission.	None		
750	Saint Paul Parks and Recreation Commission	Parks	An evaluation of where we are compared to the national scale.	Y	Trust for Public Land annual reports track this.	Mention national standing in introduction.	94	

751	Saint Paul Parks and Recreation Commission	Parks	PR-5: Add - 'play areas, pools, and other amenities' after Community Centers.	Y	Agreed, will do so.	PR-5. Prioritize investment in physical assets of Community Centers, <u>play areas, pools, and other amenities</u> to ensure that common minimum standards are met. Implementation Item #12: Develop a set of measurable performance standards for all Community Centers, <u>play areas, pools, and other amenities</u> .	95	
752	Saint Paul Parks and Recreation Commission	Parks	PR-6: Change - 'recreation AT neighborhood and community parks' from TO neighborhood and community parks'.	Y	Agree	PR-6. Use mobile recreation to fill park or recreation service gaps, enhance events, and provide quality recreation to <u>at</u> neighborhood and community parks.	95	
753	Saint Paul Parks and Recreation Commission	Parks	PR-28 or PR-29: To address the lack of acknowledgement from 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.	Y	Agree	(Done as part of earlier comment.) PR-29. Seek out partnerships with private entities, <u>such as Como Friends</u> , to finance capital and maintenance costs...	97	
754	Saint Paul Parks and Recreation Commission	Parks	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.	Y	Agree - Parks staff has provided feedback on this, and PED staff will revise.	Revise sidebar: Perceptions of Park.	95	
755	Tom Dimond	Parks	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 sever shortage of safe access. Pigs Eye Parkway and the trails shown in the Great River Passage Plan are a priority for implementation.	Y	Agree the Mississippi is underrepresented in this city-wide Comprehensive Plan, but the <i>Great River Passage Master Plan</i> , adopted as an addendum to the Comprehensive Plan in 2013, has connections to and along the river as a core principle. In the 2040 draft, access is addressed somewhat through PR-2: reduce physical barriers, and PR-37: Improve ped and bike connections between park facilities and other significant destinations such as rivers..., but a more direct policy should be added.	NEW <u>Policy PR-43. Support facility improvements that better connect neighborhoods to the Mississippi River.</u> Add reference to GRP in sidebar or introduction.	98	

756	Tom Dimond	Parks	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.	N	PR-34 and 35 address prioritizing safety in trails and integrating them into the city's broader transportation network. Pedestrian safety is greatly emphasized in the Transportation chapter. The proper tool for this will vary by situation and will be informed by the Street Design Manual. In most cases, it will not be grade separations, but that tool is available where appropriate.	None		
757	Tom Dimond	Parks	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.	N	Part of reducing physical barriers and providing equitable access to all per PR-34, PR-35. Pedestrian safety is greatly emphasized in the Transportation chapter. The proper tool for this will vary by situation and will be informed by the Street Design Manual. In most cases, it will not be grade separations, but that tool is available where appropriate.	None		
758	Tom Dimond	Parks	Include 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.	N	Similar to our approach on Highwood sidewalks (in response to D1), we should not predetermine what any revisiting of the Highwood Plan will result in or prohibit reconsideration. Changes in context or condition can lead to amendments in plans and/or policy.	None		
759	Tom Dimond	Parks	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.	Y	Agree that policy re: habitat and ecology is lacking.	New policy after PR-27 in Environmental and Economic Sustainability section: <u>Policy PR-XX. Promote the ecological function of parkland and open space, while balancing it against nature-based recreation and other public uses.</u>	97	
760	Tom Dimond	Parks	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.	N	Comment acknowledged. Believe this is a reference to <i>Great River Passage Master Plan</i> , which is in place.	None		

761	Tom Dimond	Parks	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.	N	Too specific for city-wide Comprehensive Plan. <i>Great River Passage Master Plan</i> sets a goal of improving recreational access to Pig's Eye Lake.	None		
762	Tom Dimond	Parks	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.	N	Too specific for a city-wide Comprehensive Plan.	None		
763	Tom Dimond	Parks	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 mitigate in Saint Paul. Wetland lost in the National Park should be replaced in the National Park.	N	PR/WR - City adheres to the Wetland Conservation Act, codified in Section 63.600 of the Code. Water chapter response may have more.	None		
764	Tom Dimond	Parks	Provide naturalist 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.	N	We do this through the Natural Resources group of P&R and have policies PR-9 and PR-10 that call for responsiveness to changing programming needs.	None		
765	Tom Dimond	Parks	Provide kayak and canoe rental and training at Pigs Eye Lake.	N	Too specific for city-wide Comprehensive Plan. <i>Great River Passage Master Plan</i> sets a goal of improving recreational access to Pig's Eye Lake.	None		
766	Tom Dimond	Parks	Establish parkland zoning and maintain a public record of all land that is parkland.	Y	Implementation Item #3 calls to maintain accurate maps. Additional clarity is appropriate. Regarding parkland zoning, PED staff will prepare a memo for P&R and Planning Commission consideration.	Implementation Item #3: <u>Maintain accurate maps that show, at a minimum: city parks, service area, property boundaries, transit access and physical barriers.</u>	220	
767	Tom Dimond	Parks	In Highwood, utilize undeveloped right of way for pedestrian/bicycle trails to the greatest extent possible.	N	Bike/ped priorities are guided by the city-wide Bike and Pedestrian Plans. Undeveloped ROW is often a good location for trail facilities. Thank you for the reminder.	None		
768	Tom Dimond	Parks	Provide hiking and biking trails that are separated from road (Mississippi River Trail along Point Douglas Road)	N	Implication is that separation is safer and more comfortable. "Policy PR-38. Emphasize safety, convenience and comfort when designing new trails or rebuilding those that already exist."	None		
769	Nancy O'Brien Wagner	Parks	All maps should clearly show which spaces are parklands and cemeteries. It is misleading to not differentiate these spaces when outlining things like “poverty rates” or “households with out cars.”	Y	Per general revision: Maps IN-1 through IN-11 should show parks and open space areas on the base.	Per general revision: Add parks and open spaces to Maps IN-1 through IN-11.	15-27	

770	Nancy O'Brien Wagner	Parks	Wasn't the goal to have a park accessible to all residents within a five-minute walk last time? That was a FANTASTIC goal! Also – there was a recognition of the value of having pocket parks. Where did that go?	N	There is a 10-minute walk to green space policy in PR-4. 10 minutes is the standard that Parks and Recreation uses, as well as the Trust for Public Land. No previous mention of pocket parks that staff could find.	None		
771	Nancy O'Brien Wagner	Parks	Also- where is the map that shows the location and five-minute (or ten-minute) walk radius to parks and community centers? Those of us who live in park deserts want the City to acknowledge and address that. That MUST be included.	N	This is called for in Implementation item #3. It is more in-depth than creating a buffer around park shapefiles because we want to account for actual routes and barriers such as topography and highways.	None		
772	Nancy O'Brien Wagner	Parks	Page 95 - The information on what perceived barriers exist for minority residents in regards to parks is only helpful if you also describe what perceived barriers exist for white residents. You may actually be creating or perpetuating a false sense of differences between groups. (I suspect time, and lack of awareness might apply to white visitors, too.)	Y	Comment acknowledged. Will be revising this language per other comments.	Revision to Perception sidebar.	95	
773	Nancy O'Brien Wagner	Parks	Goal 3 – Environmental and Economic sustainability. Parks should promote environmental stewardship. Where is that strand? Parks should promote recycling and water quality protection by offering recycling at the parks and within the recreation centers.	N	Policy PR-14. Support volunteer engagement and participation to enhance stewardship, programming, social cohesion and ownership. Policy PR-22. Model sustainable practices in park construction and operations when possible.	None		
774	Nancy O'Brien Wagner	Parks	PR-21 – Having parks be responsible for promoting “job training” is ridiculous. Get that out of there and put it into economic development.	N	The Right Track program is currently housed in P&R and we don't have an economic development section in the Comp Plan. Significant training does happen at parks facilities.	None		
775	Nancy O'Brien Wagner	Parks	Page 96 – Goal 3 title and Policy PR-25. Remove goal of economic self-sustainability for park programs. We shouldn't expect parks, museums, schools, or libraries to pay for themselves. Their rewards are not economic, and we shouldn't even use this type of language here. I am okay with saying “consider the economic return-on-investment of programs, in addition to their natural and social benefits.”	N	The policy is to strive to make programming self-sustaining, not disallow it if it isn't possible. PR-2 establishes policy of removing financial barriers for users. These are not mutually-exclusive.	None		
776	Nancy O'Brien Wagner	Parks	Where is the reference to protecting the natural assets of parks? The water resources? The animals and wildlife?	Y	Agree - new policy makes sense.	New policy after PR-27 in Environmental and Economic Sustainability section: <u>Policy PR-XX. Promote the ecological function of parkland and open space, while balancing it against nature-based recreation and other public uses.</u>	97	

777	Nancy O'Brien Wagner	Parks	The only mention of beauty comes in a reference to encouraging private entities to beautify their lands. Shouldn't public parks be beautiful?	Y	Point taken - will try to incorporate in intro.	Incorporate into introduction	94	
778	David Sullivan-Nightengale	Parks	In parks where people can fly drones, please consider signage to not fly over people.	N	Comment acknowledged	None		
779	David Sullivan-Nightengale	Parks	PR-20 page 97: Monitoring of invasive species should be replaced with removal of invasive species. There is no mention of the work that also needs to be done and has already been done on removal of aquatic invasive species that currently threaten the city infrastructure on the Mississippi River. Likewise, a plan to prevent the spread of AIS in what few lakes we have needs to be emphasized.	N	Noted. The language of the policy reflects the range of threat posed by different species and context within which they appear, and the need to prioritize action with limited resources.	None		
780	Chelsea DeArmond	Parks	I was encouraged by policies that increase urban density, develop neighborhood nodes, encourage accessible public transit, prioritize walking and biking, and improve access to parks and green space.	N	Comment acknowledged.	None		
781	Friends of the Park and Trails	Parks	Friends of the Parks and Trails of St. Paul and Ramsey County, a local non-profit membership organization, was established in 1985 when a development was proposed for Crosby Farm Regional Park. A group of concerned citizens banded together to speak on behalf of our priceless parks, trails and open spaces.	N	Comment acknowledged	None		
782	Friends of the Park and Trails	Parks	The introduction to the Parks, Recreation, and Open Space Chapter of the 2040 Comprehensive Plan draft states, "The Saint Paul park system comprises a large, diverse and vibrant network of people, spaces and facilities that is recognized by Saint Paul residents as one of the city's great shared assets." It goes on to say that, "Park facilities and programs improve the quality of life... foster public health...serve an important role for the city's youth by providing safe and healthy places and activities...connect us to the Mississippi River and lakes... and are an important component of sustainable economic development, drawing and retaining residents, increasing nearby property values and attracting businesses." We couldn't agree more.	N	Comment acknowledged	None		
783	Friends of the Park and Trails	Parks	We appreciate and applaud the recognition this draft gives to not only the environmental benefits of parks, recreation, and open spaces, which are more intuitively acknowledged, but also the economic, social, and health benefits they provide. Parks are fundamental building blocks when seeking environmental and economic sustainability, one of the five goals guiding the Parks, Recreation and Open Space Chapter.	N	Thanks and we're glad you agree.	None		
784	Friends of the Park and Trails	Parks	We recognize this draft was composed with the intention of being a more high-level document than previous iterations. Bearing that in mind, we strongly encourage incorporating language into the Parks, Recreation, and Open Space Chapter that reiterates the importance of community input in development planning and vigilantly maintaining public access throughout the system.	N	We agree, PR-3: Engage diverse community groups and all potentially impacted stakeholders in setting balanced priorities for park-related matters.	None		

785	Friends of the Park and Trails	Parks	It is important that mention be made of the No Net Loss Provision in the Saint Paul City Charter. This provision is highly relevant to all development decisions involving our park system and yet there is no reference to it.	Y	Agree that this is important and should be referenced.	Add note in Intro or sidebar that repeats language in existing plan: "One of the ways that parkland in Saint Paul is protected for future park users is the City's "no net loss" policy. This policy is a part of Saint Paul's City Charter, Section 13.01.1, and reads, "Lands which may have been heretofore acquired by any means or which may hereafter be acquired by any means for park purposes shall not be diverted to other uses or disposed of by the city. When the City Council decides that diversion or disposal of parkland is in the public interest, additional parklands must be acquired to replace the lands that are diverted, preferably within the same District Council area and of a similar nature to the diverted parkland."	97?	
786	Friends of the Park and Trails	Parks	There is currently no official map of the city's parkland, making the goals of maintenance and asset management particularly challenging. We recommend the city make mapping parkland a priority.	Y	Addressed in implementation item #3, but could be clarified.	Implementation Item #3: Maintain accurate maps that show, at a minimum: <u>city parks</u> , service area, property boundaries, transit access and physical barriers.	220	
787	Friends of the Park and Trails	Parks	The current Comprehensive Plan calls for a parkland zoning designation. That designation has yet to occur. When reviewing the six Focus Areas of the entire Comprehensive Plan draft (equitable cities, aging in community, community/public health, economic development, resiliency, and urban design) parkland zoning would be a tool to help achieve them.	N	Staff will prepare a memo for P&R Commission and Planning Commission consideration.	None at this time.		
788	Friends of the Park and Trails	Parks	There is no mention in the draft of the Parkland Dedication Ordinance. While we recognize this is a high-level document, given the goals of the plan and the value statements, and knowing it will be referenced when making funding and development decisions, it may be helpful to make note of this valuable tool that can help us reach the desired outcomes of resiliency and sustainability.	Y	Agree	Policy PR-18. Ensure that investment in City parks accounts for planned increases in development density <u>through tools such as parkland dedication</u> .	97	
789	Friends of the Park and Trails	Parks	Specific item notes on the Parks, Recreation and Open Space Chapter: red text indicates additional suggested language and strike through indicates suggested text removal.	N	OK	None		

790	Friends of the Park and Trails	Parks	Policy PR-1. Ensure equitable access to Parks and Recreation programs, resources and amenities including, but not limited to, racial, ethnic, income, ability, and geographic diversity . (The goal is that the users of the system are reflective of the population, not solely addressing physical access to parks but actual equity of use and opportunity. This also relates to PR-4.)	Y	Agree that this could be clarified.	Restate brief description of equity from general intro in chapter intro.	94	
791	Friends of the Park and Trails	Parks	Policy PR-9. Use systematically-collected customer and resident feedback on needs, satisfaction and trends to improve park experience and bring in new users. (We make this recommendation to clarify between systematically collecting valuable feedback on which to make important decisions versus relying on a complaint-based system. Too often, when systems are based on complaints, it's the "squeaky wheel that gets the grease" and those that don't realize the necessity of speaking up or feel uncomfortable doing so are left behind.)	N	Implementation item #2 calls to "Seek out customer and resident feedback on needs, satisfaction and trends, and incorporate into decision-making tools."	None		
792	Friends of the Park and Trails	Parks	Policy PR-10. Embrace and integrate emerging cultural and recreation trends, particularly those that meet the recreational needs of youth, underserved populations and emerging resident groups. (How will these trends be determined?)	N	Through implementation item #2 to "Seek out customer and resident feedback on needs, satisfaction and trends, and incorporate into decision-making tools."	None		
793	Friends of the Park and Trails	Parks	Policy PR-24. Develop shared-use facilities as a first option when contemplating new or replacement indoor recreation facilities while recognizing the importance of maintaining public access . (Privatization of public facilities doesn't seem to be the goal here so it's important for that to be put in writing somehow.)	Y	Public access is implied if facility is shared, but suggest the following revision instead.	"Develop <u>publicly-accessible</u> shared-use facilities as a first option..."	97	
794	Friends of the Park and Trails	Parks	Policy PR-26. Use data-driven evaluation of all park assets to develop a maintenance and replacement schedule, and plan for future budgetary needs. (We recognize the 2017 Ameresco report regarding capital assets, but this will be difficult to accomplish without comprehensive and accurate mapping of all parkland resources. The city needs to prepare accurate boundaries of parkland within the city to be able to accurately monitor those resources, thus our recommendation to make such mapping a priority.)	N	Implementation Item #3 calls for maintenance of accurate maps.	None		
795	Friends of the Park and Trails	Parks	Policy PR-29. Seek out partnerships with private entities to finance capital and maintenance costs of Parks and Recreation facilities without compromising good design solutions, reducing public access or over-commercializing the public realm.	Y	Agree.	Policy PR-29. Seek out partnerships with private entities to finance capital and maintenance costs of Parks and Recreation facilities without compromising good design solutions, <u>reducing public access</u> or over-commercializing the public realm.	97	

796	Friends of the Park and Trails	Parks	Policy PR-34. Prioritize safety and equity when filling gaps in the trail and bikeway system to ensure seamless connections throughout the city for pedestrians and bicyclists of all ages and abilities. (How will equity be used in this way? What approach will be used to evaluate?)	N	That's the purpose of Implementation Item #11: Develop objective and updatable methods to identify where there are disparities in accessibility to park assets based on race, ethnicity, income and ability.	None		
797	Friends of the Park and Trails	Parks	Policy PR-40. Provide consistent wayfinding signage in each project or park so that it is recognizable as part of the broader City system while being cognizant of the negative impacts of signage in natural areas.	N	The change proposed is addressed during the design phase. PR-15 calls for design to use best practices and PR-16 calls for improving safety through design. Both of these (in addition to consideration of project-specific context) will inform signage decisions.	None		
798	Friends of the Park and Trails	Parks	Policy PR-41. Involve staff from the Department of Parks and Recreation and park and community advocacy groups from the beginning in the early stages of discussions regarding large-scale land redevelopment sites. (We acknowledge staff plays an important role when meeting with developers at the beginning of projects and we certainly don't intend for this to be an interference with that. However, we believe it is reasonable that the public should be involved in the early stages of large-scale developments and not just after potential uses have been whittled down to certain choices.)	Y	Noted. PR-3 addresses involving stakeholders and community groups. Add "early" to emphasize importance of that.	Policy PR-3. Engage diverse community groups and all potentially impacted stakeholders <u>early</u> in setting balanced priorities for park-related matters.	95	
799	Friends of the Park and Trails	Parks	Policy PR-42. Address physical park encroachments that impair use through effective parkland management and protection. (Accurate mapping of existing parkland is required so that this can be done. It is not possible without it.)	N	Implementation Item #3 calls to maintain accurate maps.	None		
800	Center for Economic Inclusion	Parks	Policy PR-12 states “Ensure Parks and Recreation staff reflect the demographic diversity of a dynamic city to better inform decisions regarding operations and facilities.” The Center applauds this policy and agrees that greater diversity can create more inclusive decisions. But why limit this policy to Parks and Recreation staff rather than all city departments? Also, why not seek to match staff diversity to that of the City of Saint Paul (rather than “a dynamic city”)? A revised policy might read: “Ensure all City of Saint Paul staff reflect the demographic diversity of the city to better inform decisions.”	N	This is addressed through the City's four city-wide equity goals, which form the work program for the Chief Equity Officer in the Mayor's Office. Goal #1 is Equity in our Workforce, and reads "Build a workforce that represents the communities that we serve. Address disparities within the city as an organization, to achieve workplace diversity and create and sustain an inclusive work environment. Departments will focus on hiring, retention and promotion practices, positive workplace culture, as well as training and awareness."	None		

801	Tom Dimond	Parks	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.	N	Pedestrian and bicycle safety are greatly emphasized in the draft Plan, as is access to the Mississippi River. Separated trails are often an appropriate treatment, as are sometimes grade-separated crossings. Policies support consideration of such treatments. Exact treatments are guided by the Street Design Manual and specific modal plans (city-wide Bike and Pedestrian Plans).	None		
802	Tom Dimond	Parks	Encourage the use of the lake for rowing training and events.	N	Too specific for city-wide Comprehensive Plan. <i>Great River Passage Master Plan</i> sets a goal of improving recreational access to Pig's Eye Lake (assuming this is the referenced lake).	None		
803	Tom Dimond	Parks	Work with the Metropolitan Council to transfer lands outside the waste treatment plant berm to the park.	N	Comment acknowledged. Ramsey County is the implementing agency.	None		
804	Tom Dimond	Parks	We must demand nothing less than a city where: * extensive trail system that serves all neighborhoods * 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	N	Comment acknowledged	None		
805	Tom Dimond	Parks	Wherever you go in Saint Paul we should feel safe including clean air, clean water, clean soil, and safe hiking and biking paths.	N	Comment acknowledged	None		
806	Tom Dimond	Parks	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.	N	Comment acknowledged. The Great River Passage Master Plan, an addendum to the Comprehensive Plan, supports better connections between Pig's Eye Regional Park and nearby City and regional parks, as well as increased recreational uses in the Pig's Eye area.	None		

807	Tom Dimond	Parks	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.	N	See <i>Great River Passage Master Plan</i> for specifics related to East Side, and follow activity for East Side River District: https://greatriverpassage.org/projects/	None		
808	Tom Dimond	Parks	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.	N	Comment acknowledged		97	
809	Tom Dimond	Parks	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.	N	Comment acknowledged and forwarded to Parks and Recreation staff.	None		
810	Tom Dimond	Parks	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 Lilydale 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.	N	Implementation item #10 was included to address investment criteria. "Develop objective criteria for investment, including, but not limited to, equity, cost-benefit analysis, changing development intensity, and people potentially served."	None		

811	Tom Dimond	Parks	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.	N	The East Side River District is one of three implementation priorities of the Great River Passage Initiative: https://greatriverpassage.org/projects/	None		
812	Tom Dimond	Parks	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))	N	The Transportation and Mississippi River Corridor Critical Area chapters encourage a "working river," including barge transportation and support for jobs in river-related industries. Although there are also multi-chapter policies to support recreation and public use/access along the river, we are making the commitment to pursue both sets of aims as much as possible. The nine themes and priorities that came out of community engagement support this approach, as does the balance of "economic development" and "resiliency" lenses.	None		
813	Tom Dimond	Parks	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)	N	Currently, "parkway" design guidelines are lightly covered in the Street Design Manual. Consider this comment if/when parkway guidelines are established, which is beyond the scope of the Comp Plan.	None		
814	Tom Dimond	Parks	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)	N	The purpose of Maps P-1 and P-3 are to show regional trail facilities, per Met Council guidance. Most of the trails mentioned in the comment are local or not under the jurisdiction of Saint Paul.	None		
815	Tom Dimond	Parks	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.	N	Comment acknowledged.	None		

816	Tom Dimond	Parks	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 expanded 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.	N	Comment acknowledged.	None		
817	Saint Anthony Park Community Council (SAP)	Parks	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.minneapolisarks.org/_asset/895jfr/Chapter-4-Parks-Regional-Trail.pdf .	N	Thank you for bringing this up. PED and Parks staff have reviewed the resources you provided and will monitor through local/district plans.	None		
818	Saint Anthony Park Community Council (SAP)	Parks	The proposed ten-year plan for Saint Anthony Park 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.	N	Coordinate this issue through the district plan update process.	None		
819	Saint Anthony Park Community Council (SAP)	Parks	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.	N	Thank you for bringing this up. PED and Parks staff have reviewed the resources you provided and will monitor through local/district plans.	None		
820	Saint Anthony Park Community Council (SAP)	Parks	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.	N	Staff reviewed City documents, including the Westgate Station Area Plan, and couldn't find Saint Paul plans for park space in that location.	None		

821	Saint Anthony Park Community Council (SAP)	Parks	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.	N	Thank you for bringing this up. PED and Parks staff have reviewed the information regarding current planning efforts and will monitor through local/district plan processes. Re: the possible park, staff reviewed City documents, including the Westgate Station Area Plan, and couldn't find Saint Paul plans for park space in that location.	None		
822	Saint Anthony Park Community Council (SAP)	Parks	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.	N	This is the purpose of Implementation Item #3: Maintain accurate maps that show, at a minimum: service area, property boundaries, transit access and physical barriers.	None		
823	Saint Anthony Park Community Council (SAP)	Parks	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.	N	The Department of Parks and Recreation recently adopted park signage guidelines to create consistent and identifiable wayfinding. The policy is there to support distribution of consistent signage. We support involving local artists in ways outside of park system wayfinding design.	None		
824	Saint Anthony Park Community Council (SAP)	Parks	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.	Y	Agree clarity would benefit plan.	Label all partnered facilities by asterisk.	105-107	
825	Ralph Pribble	Parks	I just want to make sure that the city plans for plenty of green space and parks in the future, including creating new ones and/or expanding existing ones.	N	Policy PR-18. Ensure that investment in City parks accounts for planned increases in development density.	None		
826	Ralph Pribble	Parks	In my opinion the entire Ford site should become green space or a park; we'll never have that opportunity again.	N	Comment acknowledged. This is not the vision in the <i>Ford Zoning and Public Realm Master Plan</i> adopted by the City Council in 2017.	None		

827	Ralph Pribble	Parks	How important are parks and green space? Ask the residents of Manhattan if they would rather that Central Park had instead been given over to affordable housing or mixed-use development.	N	Comment acknowledged.	None		
828	Jake Reuter	Parks	Saint Paul should experiment with transitioning residential streets into woonerfs that could allow for additional gardens, play space, etc. We should take back some of the massive amount of space that is given to cars in this city and make it a place for people to live and play.	N	Policy T-38 calls for improving the environmental sustainability of rights-of-way, which could include woonerfs. Convertible streets (woonerfs) are covered in the Street Design Manual.	None		
829	Michael Kuchta	Parks	Page 107: The draft does not include Northwest Como Recreation Center in its inventory of non-regional parks and trails. Thank you.	Y	You are correct. The list shows only assets owned by the City. The Northwest Como Rec Center is owned by the school district.	Table Title on p. 105: <u>City-Owned Non-Regional Park and Trail Inventory</u>	105	
830	Kathy Sidles	Parks	1. Saint Paul and other cities long range development plans could include no loss of green space and higher density development on already paved/developed areas.	Y	City has a no-net-loss-of-parks policy in its charter. Will add language in plan to highlight that.	Add note in Intro or sidebar that repeats language in existing plan: "One of the ways that parkland in Saint Paul is protected for future park users is the City's "no net loss" policy. This policy is a part of Saint Paul's City Charter, Section 13.01.1, and reads, "Lands which may have been heretofore acquired by any means or which may hereafter be acquired by any means for park purposes shall not be diverted to other uses or disposed of by the city. When the City Council decides that diversion or disposal of parkland is in the public interest, additional parklands must be acquired to replace the lands that are diverted, preferably within the same District Council area and of a similar nature to the diverted parkland."	97?	
831	Kathy Sidles	Parks	All development proposals such as the Rush Line and Pig's Eye rail upgrade should include an assessment of natural areas lost and degraded and impacts on endangered species before project approval. For example, environmental assessment of the Rush line bus lane replacement of the Vento Trail is being done after approval.	N	This would be addressed through environmental review, required under Federal and State law.	None		
832	Kathy Sidles	Parks	2. Support neighborhoods along river corridors that are included in recent MeCC plans to bring some public dollars back to urban neighborhoods. Expand the plan to neighborhoods that are green interpretive deserts.	N	Not sure what MeCC is? Also not sure what "expand the plan" means.	None		

833	Kathy Sidles	Parks	3. All parts of the metro area can have a protected neighborhood corridor. Give Rail Roads, highway right of ways, buried stream and waste water green spaces names, protect them, pick up the trash and enhance them.	N	Not sure what is meant by "protected neighborhood corridor," but walk and bike connections are encouraged by the Transportation Chapter. Naming is not covered by the Comp Plan.	None		
834	Kathy Sidles	Parks	4. The Bruce Vento Bike Trail could become a Regional Park and enhanced for wildlife instead of a bus lane. The high density of diverse families along it would then have access to Regional Park programming. As with the Snelling buses, public transit to all parts of the metro can go where the riders are - White Bear, Maryland, English, Phalen Boulevard to BRT on 35E. We need both trails and public transit to compete with the suburbs for business and homeowners and prevent urban sprawl.	N	The Bruce Vento Bike Trail is a regional trail. Planning for Rush Line BRT is a separate process led by Ramsey County. The Comprehensive Plan supports studying that BRT line, but does not presuppose the Vento Trail interface or precise BRT guideway location.	None		
835	Stuart and Mary Ellen Knappermiller	Parks	We need to tap into our elders - 2,000 live in the PPCC area -to help children walk SRTS, tutor in schools, volunteer in our rec centers, for our police and firefighters.	N	Yes. Our aging residents are an incredible resource.	None		
836	Stuart and Mary Ellen Knappermiller	Parks	We need to connect as citizens to make our parks and water and homes and businesses places of vibrancy, especially because our daughter in law says she fits in better walking at Phalen than her Euro-American in laws do.	N	Comment acknowledged.	None		
837	Payne-Phalen Community Council	Parks	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 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.	N	Noted and passed along to PED and Parks staff.	None		
838	Payne-Phalen Community Council	Parks	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.	N	Comment acknowledged.	None		
839	Payne-Phalen Community Council	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.	Y	Agree.	Revise Map P-2 to show rec centers.	101	

840	Payne-Phalen Community Council	Parks	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?	Y	Agree.	Add description of what RTSC is.	103	
841	Payne-Phalen Community Council	Parks	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?	Y	The list shows only assets owned by the City. The Hancock Rec Center is owned by the school district. Should clarify title of list and indicate with an asterisk which are partnered facilities.	Table Title on p. 105: <u>City-Owned Non-Regional Park and Trail Inventory</u> . Also, label all partnered facilities by asterisk.	105-107	
842	Payne-Phalen Community Council	Parks	33. Policies on partnerships and shared-use facilities (PR-24, PR-29, PR-32) are excellent and should be promoted/continued.	N	Comment acknowledged	None		
843	Payne-Phalen Community Council	Parks	34. PR-33 - Coordination with SP Public Schools to reduce redundancies is important. Both lead to cost-savings for residents.	N	Comment acknowledged	None		
844	Derek Thompson	Transportation	I want to live in an urban city where walking, biking, and transit are an option.	N	Comment acknowledged.	None		
845	Lucas Miller	Transportation	Saint Paul needs more transit options as people move into the city. We desperately need transit down main arterial corridors along with options that allow people to get two and from those arterial corridors to businesses, homes and other points of interest. Having access to transit that helps people explore Saint Paul will help businesses and the local economy grow and prosper.	N	The 2040 Plan reflects these statements.	None		
846	Connor Schaefer	Transportation	Support development near regional parks that is dense, walkable, and has access to frequent transit service. More people need to be able to live within walking distance of regional park facilities.	N	The Parks chapter supports this.	None		
847	Jake Reuter	Transportation	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.	N	It is not appropriate to remove minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study. If directed by the Planning Commission, we will add the elimination of parking minimums to the study.	None		
848	Thomas Kottke	Transportation	An emphasis on modes of transportation other than the private automobile will not only assure mobility for individuals who either cannot afford or choose not to own a car, it will improve the improve the health and well-being of St. Paul's residents because the air will be cleaner and opportunities for physical activity will be built into daily life.	N	We agree!	None		

849	Kory Andersen	Transportation	First and foremost I think that St Paul is in a unique position to draw a stark contrast to the Minneapolis 2040 Comp Plan. We've seen the document. In St Paul we should go farther in making our city a better and more livable place under the challenges of global warming and quickly diminishing resources. Among many strategies, we need to be bold by eliminating parking minimums altogether. I appreciate the roundabout solutions that the comp plan draft currently has to address parking, but given the reality of our world, it is somewhat tone deaf. For decades we have prioritized cars to the detriment of our city. It is time to swing it back and stop preserving SFH owner's non-existent right to parking in the public right of way.	N	It is not appropriate to remove minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study. If directed by the Planning Commission, we will add the elimination of parking minimums to the study.	None		
850	Kory Andersen	Transportation	Other key issues that we should consider. 1. Street calming measures citywide--pedestrians attempting cross any unsignalized crosswalk in this city are ignored for minutes until a good samaritan driver actually obeys the rule of the road. Traffic calming looks like larger investment in road reconstructions making shorter turning radii, ADA infrastructure, taking away car space and making it ped space, street trees, etc.	N	Traffic calming and pedestrian safety already adequately covered by several policies under Goal 2. Taking away car space for pedestrian space can happen under draft policies - no need for specific lingo.	None		
851	Kory Andersen	Transportation	4. Finish the Midtown Greenway to Saint Paul	N	Policy T-24 (implement Bike Plan) covers this, as does Map T-3 Bikeways.	None		
852	Kory Andersen	Transportation	5. Bus and light rail priority. I know there are a variety of authorities and entities involved with the twin cities transit system and roads. However, the City of Saint Paul does have some part to play in the accessibility and efficiency of our public transit system...not to mention a bully pulpit. It makes zero sense why do dozens of ppl who chose to ride a train or a bus have to wait/contend for space with individuals in single occupancy vehicles. I mean there is a history of stigmatizing the users of public transit/treating them like second class citizens. Let's lead the twin cities in this change! Bus only lanes and LRT high prioritization at signals (should not be waiting at Snelling/University for cars to go by (Also Portland, Oregon has great examples of this)), would go a long way in increasing ridership, reducing traffic, and re-balancing modes of transportation.	Y	Policy T-27 is pretty wordy, but a minor addition could be made along these lines	Policy T-27: "...land use intensity and design, <u>increased traffic signal optimization for transit</u> , working with transit providers..."		
853	District 1 Land Use Committee	Transportation	We have also strongly supported, as an organization, the rebalancing of transportation modes and making our streets safer. We believe that residents should not be obligated to own a motor vehicle to meet daily needs. We believe that more transportation options need to be developed in our district and on the East Side, including continuing to add bicycle infrastructure and increasing the frequency and availability of transit. Part of this development requires a commitment to all-season maintenance so that these modes are always available regardless of season. We encourage all efforts to help neighborhoods across the city transition from autocentric to people-centric.	N	We agree! A better balance of modes is central to the Transportation chapter goals and policies.	None		
854	District 1 Land Use Committee	Transportation	pg. 55: T-3, we want to underscore how critical this policy is on its own and how all other transportation safety policies stem from it.	N	Comment acknowledged.	None		

855	District 1 Land Use Committee	Transportation	T-12, add “and on parkways” to the end.	N	Adds clutter to little/no benefit. Not only is the phrase being added to an "especially" clause, but all parkways other than Lexington have "adjacent planned bikeways" as already mentioned in the clause.	None		
856	District 1 Land Use Committee	Transportation	Add a new policy to Goal 2 to read “promote highway turn backs to maximize local control of arterial road design, including providing financial resources to maintain the road after turn back.”	N	Local control has benefits, but also costs. We should continue to evaluate turnbacks on a case-by-case basis. No policy change needed to do that.	None		
857	District 1 Land Use Committee	Transportation	pg. 56: T-15, add “including the use of smaller freight delivery vehicles.”	Y	The emphasis is more so on delivery coordination and timing, so we should mention either all of these potential solutions or none. The language addition is bulky, but helps demystify the uncommon umbrella term "freight delivery solutions."	Policy T-15: "Explore freight delivery solutions that resolve loading/unloading conflicts in congested areas so as to support businesses and provide safety to pedestrians and road users. <u>Solutions could include delivery coordination and timing, and use of smaller freight delivery vehicles.</u> "		
858	District 1 Land Use Committee	Transportation	pg. 57: T-26, remove reference to Highwood. Sidewalk policies should be consistent citywide.	N	Would require revising the Highwood Plan with a predetermined outcome.	None		
859	District 1 Land Use Committee	Transportation	Add a new policy in Goal 4 to read “work to transition downtown to being single-occupant vehicle-free, at least during peak hours, while giving special consideration to people with mobility challenges.” Initial steps that could advance this are completion of the Capital City Bikeway, increasing transit priority on streets that carry transit lines, implementation of the 4th Street Market District, and disincentivizing the construction of new parking capacity in downtown.	N	Covered by Policy T-22: "Shift mode share towards walking, biking, public transit, carpooling, ridesharing and carsharing..." Also advanced by policies promoting bicycle and transit infrastructure. Off-street parking is being handled by the Land Use chapter.	None		
860	District 1 Land Use Committee	Transportation	pg. 58: T-31, we request that you also include policy language encouraging the dedication of public trail easements in places where a street grid is infeasible, or in addition to the street grid. An example in Saint Paul is Central Village.	N	The policy explicitly says "right-of-way grid" - not "street grid" - to allow for pedestrian or bike connections without a full street.	None		

861	District 1 Land Use Committee	Transportation	Add a new policy in Goal 4 to read "Coordinate with Saint Paul Public Schools to consolidate school bus routes and/or provide additional transportation options to both reduce bus traffic in neighborhoods and provide transportation options to students that does not require use of personal vehicles."	N	This is probably more appropriately directed to Metro Transit. Reducing school bus traffic does not seem like a high priority, based on overall public input and the actual traffic impact of buses (pretty small). Reducing use of personal vehicles by improving bus options to students could be appropriate for the Implementation Chapter, but that seems awfully narrow for inclusion. This idea could be covered under existing "shift mode share" language.	None		
862	District 1 Land Use Committee	Transportation	T-41, we find it important to acknowledge that just because a new technology is fun and flashy, it must still meet other City goals, including the VMT reduction goal.	N	Comment acknowledged.	None		
863	District 1 Land Use Committee	Transportation	T-42, we request some wording that emphasizes that the City will not bear all of the cost of adapting to new private modal technologies.	N	The City would never bear "all" the cost. A more nuanced statement along these lines could work, but is unnecessary in a Comp Plan.	None		
864	District 1 Land Use Committee	Transportation	pg. 68: Show the transit lines that operate on McKnight Rd.	Y	Agree	Crop Map T-7 to include McKnight and Larpenteur		
865	District 1 Land Use Committee	Transportation	pg. 69: Extend the arrow for Red Rock all the way to the southern border.	Y	Agree	Amend Map T-8 as suggested		
866	District 1 Land Use Committee	Transportation	We request you add a new “proposed transitway” that follows the alignment proposed in the East 7th St ABRT study and that is currently served by the 54M bus. This transitway is identified on pg. 6.67 of the Transportation Policy Plan under the Increased Revenue Scenario.	Y	Agree	Add red arrow to Map T-8 on E 7th between downtown and Arcade		
867	District 1 Land Use Committee	Transportation	pg. 73 & 74: Show the AADT of McKnight Rd. Traffic volume is a significant factor in decisions made about that road in the future.	Y	Agree	Crop Maps T-12 and T-13 to include McKnight and Larpenteur		
868	KC Cox	Transportation	It also seems that auto transportation is to be banned. Public transportation doesn't always work for everyone.	N	Auto transportation is not banned by the policies. It's important to remember that the focus of a plan is on what's changing, e.g. <i>increases</i> in modes other than SOVs. Noted that we need to consider the practicalities of public transit.	None		

869	Tom Dimond	Transportation	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.	N	Pedestrian safety is greatly emphasized in the plan. The proper tool for this will vary by situation and will be informed by the Street Design Manual. In most cases, it will not be grade separations, but that tool is available where appropriate.	None		
870	Tom Dimond	Transportation	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.	N	Pedestrian safety is greatly emphasized in the Transportation chapter. The proper tool for this will vary by situation and will be informed by the Street Design Manual. In most cases, it will not be grade separations, but that tool is available where appropriate. Further, the city-wide Bike Plan sketches such a system of trails, which often also accommodate pedestrians.	None		
871	Tom Dimond	Transportation	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.	N	Covered by Policy T-33: Improve pedestrian and recreational connections to the Mississippi River.	None		
872	Tom Dimond	Transportation	In Highwood, utilize undeveloped right of way for pedestrian/bicycle trails to the greatest extent possible.	N	Bike/ped priorities are guided by the Bike and Ped Plans. Undeveloped ROW is often a good location for trail facilities. Thank you for the reminder.	None		
873	James Slegers	Transportation	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.	N	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study. Policy T-17 ("Use pricing to manage parking demand...") already supports charging market rates in areas with high demand, such as permit parking areas. The basic premise of the 2040 Comprehensive Plan is to grow by developing at higher densities along transit corridors.	None		

874	Frank Alarcon	Transportation	As a resident of Saint Paul, I would like the comprehensive plan to abolish single-family zoning and minimum parking requirements, like the Minneapolis 2040 plan. These policies restrict the supply of housing and raise the cost of development, contributing to the region's housing crisis that disproportionately harms people of color and people with low incomes. They also exacerbate climate change by guaranteeing space for cars and reserving swaths of the city for single-family homes only.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter. It is not appropriate to remove minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	None		
875	Kathleen Kelso	Transportation	We recommended that themes aging in community and healthy aging be given critical attention as we prepare for an demographic shift that will require new housing models, new transit models, and broad based connectivity.	N	Aging in community is an integral value embedded throughout the Plan.	None		
876	Kathleen Kelso	Transportation	This demographic shift means fewer people in the workforce, increased need for health and social services (e.g. in-home care, case management), increased demand for affordable and accessible housing and transit, walkable community environments, and leisure and educational services – all of which come at a significant cost to local governments, educational agencies and nonprofit organizations.	N	Comment acknowledged	None		
877	Eric Osekowsky	Transportation	I support the overarching development and transit goals it contains.	N	Comment acknowledged	None		
878	Nancy O'Brien Wagner	Transportation	Where decreasing parking requirements?	N	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	None		

879	Elisabeth Wurtmann	Transportation	Additionally, I support the elimination of parking requirements to allow increased density and a greater emphasis on our city's strong public transit options.	N	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	None		
880	Tyler Teggatz	Transportation	Pedestrians, cyclists, and transit riders should be prioritized over drivers of cars and trucks.	N	T-3 does this, by setting a modal hierarchy for design of peds, bikes, transit, then other modes.	None		
881	Rick Varco	Transportation	Add a new policy to eliminate Permit Only Parking or at least charge a market rate for neighborhood permit holders. There is no reason to give away the use of public land at below market rates. Every person has an equal right to every public parking spot. People who want to reserve a spot should pay the going price for the privilege.	N	Policy T-17 ("Use pricing to manage parking demand...") already supports charging market rates for permit parking in areas with high demand.	None		
882	Tyler Blockmon	Transportation	Also there's a huge sidewalk gap along West 7th just past the Montreal/Lexington/West 7th intersection that makes pedestrian safety pretty abysmal. Please fix it.	N	We'll pass along to Public Works. Draft Comp Plan policies support and prioritize these types of projects. The Pedestrian Plan, currently under consideration by the City Council, also identifies gaps in the sidewalk system that need fixing.	None		
883	David Sullivan-Nightengale	Transportation	Page 8 - Autonomous vehicles. We cannot allow our pedestrians, cyclists, and other users of our streets to be test subjects for autonomous vehicle manufacturers. The majority of autonomous vehicles being tested are actually heavier and larger than existing vehicles due to the need to carry multiple additional sensors. Very few are small electric vehicles that are not crashworthy. There is currently no consensus standard for the safety certification of these vehicles that either NHTSA or the State of Minnesota requires for safety on our roads. The majority of these vehicles are tested in dry environments where snow rarely accumulates today. Don't allow these on our busy streets until the industry can make a safety case. As someone who has worked within this industry specifically in the area of system safety, it is a long way off from doing that.	N	MnDOT will determine AV testing standards in Minnesota. Policy T-41 calls for ensuring that AVs further the City's transportation priorities, which include pedestrian and bicyclist safety.	None		
884	David Sullivan-Nightengale	Transportation	Rail safety is not mentioned in the plan either to improve pedestrian safety in and around light rail or prevention of freight rail vs pedestrian mishaps. We've had many fatalities and injuries in St. Paul both with pedestrians vs rail and automobiles versus rail.	N	We have several policies that support pedestrian safety. This is covered without calling out specific modes that can conflict with pedestrians.	None		
885	David Sullivan-Nightengale	Transportation	No mention is made of the safety of hazardous materials leak potential from high hazardous freight trains that are stopped for extended period of time in our neighborhoods and flowing through our neighborhoods.	N	The City has no regulatory control over freight train operations or contents.	None		

886	David Sullivan-Nightengale	Transportation	Policy LU-54 No new construction should be allowed near the routes of high hazardous freight trains in St. Paul as it will be impossible to prevent fatalities in a derailment in close proximity to the tracks hauling hazardous materials. While many rail accidents occur at intermodal facilities, these are of lower severity due to the slow speeds at these facilities. The most severe occur between facilities where the potential for derailment of multiple cars in urban areas near homes and businesses exist. The at-grade crossing at Como with the BNSF should be part of the plan for long-term mitigation through grade separation. Additional measures to prevent pedestrians from getting injured by walking on the freight rail tracks need to be pursued.	N	Grade-separation can be considered as guided by the Street Design Manual. The Comp Plan does not need to call out specific railroad/street intersection designs.	None		
887	David Sullivan-Nightengale	Transportation	The FRA needs to be responsive at getting the railroads to fix bridges which continue to jettison debris into the river and onto the roadways posing a hazard to other modes of transit.	N	City has no control over railroad operations.	None		
888	David Sullivan-Nightengale	Transportation	Page 55 safety and accessibility for all users. We need the city to ensure shoveling of sidewalks at intersections after each and every snowfall. There are entire blocks that are inaccessible to wheelchair users even after 72 hours after snowfall events.	N	Snow removal details are too specific for the Comprehensive Plan. The draft Pedestrian Plan deals with snow removal in more detail.	None		
889	David Sullivan-Nightengale	Transportation	Map T-17: No new facilities for rendering animal products or composting facilities should be near the St. Paul Downtown Airport as this increases the risk of bird strikes with aircraft. This could affect the airport operating certificate. Please include the reference to the Airport Operations Plan.	N	Animal rendering is not allowed in Saint Paul. Composting is a conditional use in I-1 and I-2 districts, which surround the airport. Land Use implementation items call for working on airport-area land uses. Also worth remembering that Pig's Eye Lake is adjacent.	None		
890	David Sullivan-Nightengale	Transportation	Regarding numerous drone sightings at the St. Paul Downtown Airport, please consider including signage for parks located within the five nautical mile Class D Airspace over St. Paul for coordination of airspace. Be aware that a heliport also exists for Regions Hospital.	N	Land Use chapter implementation items call for working on airport-area land uses. Signage prescriptions are too specific for Comp Plan policies.	None		
891	David Sullivan-Nightengale	Transportation	Page 80: Dale Street Bridge over I-94 is not a potential project - it is currently a planned project.	Y	Agree.	Delete "Dale Street Bridge over I-94" from Appendix B		
892	David Sullivan-Nightengale	Transportation	Please add sidewalks on the South Side of Larpenteur Avenue as a future project.	N	Falls under general "Pedestrian facilities" in Appendix B. Also, several policies support this type of project.	None		
893	Chelsea DeArmond	Transportation	I was encouraged by policies that increase urban density, develop neighborhood nodes, encourage accessible public transit, prioritize walking and biking, and improve access to parks and green space.	N	Comment acknowledged	None		

894	Chelsea DeArmond	Transportation	Even though there is a policy (T-4) to develop electric vehicle infrastructure, there is no policy to transition the city's fleet to electric vehicles. I want the city to take a leadership role in the transition to carbon-free energy and transportation that we all need to make. The next 20 years are a critical time for our city and our planet.	Y	This is being addressed in the Climate Adaptation and Resilience Plan. We could also address it in the Implementation Chapter.	New "ongoing" Implementation Chapter item in Figure I-1: " <u>Transition City vehicle fleets to electric propulsion, including typical passenger vehicles in the short- to medium-term, and larger vehicles and public safety vehicles as technology allows.</u> "		
895	Jean Comstock	Transportation	Compliments on Policy T-4: Significantly reduce carbon emissions from motor vehicles by developing infrastructure that supports vehicle electrification. However, I would also like to see plans and a timeline for electrification of the St. Paul City's fleet (including city and police cars). If this is not the right document to address this, could you please tell me where it might be (for example, the next climate action plan)?	Y	This is being addressed in the Climate Adaptation and Resilience Plan. We could also address it in the Implementation Chapter.	New "ongoing" Implementation Chapter item in Figure I-1: " <u>Transition City vehicle fleets to electric propulsion, including typical passenger vehicles in the short- to-medium-term, and larger vehicles and public safety vehicles as technology allows.</u> "		
896	Luke Hanson	Transportation	We should follow the Minneapolis 2040 plan and relax government restrictions on multi-family housing throughout the city and eliminate parking requirements.	N	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	None		
897	Luke Hanson	Transportation	Higher population densities will make it financially practical to add more numerous and frequent transit options, making it more practical for St. Paulites to live without a car.	N	Comment acknowledged	None		

898	Luke Hanson	Transportation	More people walking and taking transit will mean better public health, a stronger sense of community, and the greater public safety that results from more “eyes on the street.”	N	Comment acknowledged	None		
899	Luke Hanson	Transportation	LU-13 should “eliminate” parking minimums rather than “reduce” them. Parking minimums inherently favor automobiles as a mode of transportation, burdening business owners and housing developers with additional costs that are passed to consumers and residents, and undermining the possibility of St. Paul being a transit-friendly, walkable community.	N	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	None		
900	Eric Saathoff	Transportation	I hope the city takes this opportunity to eliminate parking minimums citywide. There is no reason that the city should be enforcing a car-centric transportation system. Residents and business owners should decide what amount of parking they need and supply it themselves. This is an easy way to make housing more affordable and make it easier to do business in our city.	N	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	None		
901	Al Davison	Transportation	Regarding transportation, removing (or at least reducing) parking minimums (ex: LU-13) can help base an area's actual parking demand off the true market demand rather than inducing parking demand off arbitrary metrics set forth by local government. Minimum parking regulations have caused the unnecessary destruction of buildings for surface parking. Surface parking lots have hurt the city’s commercial corridors along Payne, Rice, and University since the mid-20th century. We have limited space in the city, and we have to acknowledge that large surface parking lots tend to negatively impact urban neighborhoods. In areas with high parking demand, paid parking meters and ramps should be considered since parking is an expensive asset to build and maintain. Designated [handicap] parking for disabled people can remain a priority for where it is needed. While parking in the city can be difficult in some places, there is a limit on the economic feasibility to build/maintain parking by both businesses and the city. We have to be more proactive in parking management, and the city's goals towards promoting shared parking is a good step forward.	N	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	None		
902	Al Davison	Transportation	Regardless of parking needs, the city needs to improve its multi-modal transportation network. Autonomous vehicles will not be able to replace many trips taken by transit, biking, and walking. Therefore we need to put more of a focus on improving the spaces on roads or streets for all users, regardless of their transportation mode. Both local residents and visitors benefit from better sidewalks, transit, and bike infrastructure that can help reduce parking demand, especially in areas that are unable to widen roads and add more parking.	N	This is indeed an emphasis of the Transportation Chapter.	None		

903	Al Davison	Transportation	Arterial Bus Rapid Transit (aBRT) and improving frequencies on other bus routes can help support existing transit riders along with adding new riders. These bus investments that can be made in the short-term, rather than having people waiting for until the 2030-40s for better transit (such as fixed rail transit). Corridors such as West 7th need improvements to the 54 bus route immediately rather than just waiting for the Riverview Corridor streetcar to be built. The North End and the East Side need better buses; giving the buses signal priority at some traffic signals like the A-Line aBRT and Green Line light rail line can help speed up travel times.	Y	ABRT comment noted. Policy T-27 is pretty wordy, but a minor addition could be made along these lines. [See also Kory Anderson comment on T-27]	Policy T-27: "...land use intensity and design, <u>increased traffic signal optimization for transit</u> , working with transit providers..." [See also T-27 revision in response to Kory Anderson]		
904	Al Davison	Transportation	Converting unsafe undivided 4-lane roadways (e.g. Rice St) to 3 or 2-lane roadways will help make our city streets and roads safer for all users. Traffic signals should not require people walking to press a "beg button" in order to get a walk signal. Installing more Leading Pedestrian Intervals (LPIs) at traffic signals can help improve safety by making people crossing a road/street on foot more visible to people driving. If the city is able to commit to its current bike plan, Saint Paul will become a much better safer city to bike in, especially with the Capitol City Bikeway. Most of these goals will require better coordination with Ramsey County and MnDOT, along with promoting these goals through representatives and senators who serve residents of Saint Paul in the state legislature. Reducing speed limits and promoting “complete streets” (e.g. narrower lane widths) are examples of actions that will require legislative changes due to current legal restrictions set forth by the state.	N	LPI is a good pedestrian safety tool that is covered in the Street Design Manual, which guides specific street design treatments. Other comments are already supported by policies in the Transportation Chapter.	None		

					The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.			
905	Zack Mensinger	Transportation	Two of the most important changes that could be enacted are upzoning and eliminating parking minimums.	N		None		
906	Zack Mensinger	Transportation	While the goals of LU-13 are laudable as is, language in LU-13 should be changed to ELIMINATE, not just reduce parking minimums. And instead of just "supporting" these strategies, they should just be more firmly and completely adopted. If we are to truly reduce auto-dependency and fight climate change, we have to reduce the availability of excess parking in St. Paul. While some might argue that eliminating parking minimums would hurt businesses, I have almost never encountered an area without an excess of parking in St. Paul, plus, parking costs are quite high so requiring them puts small businesses at a disadvantage relative to larger businesses and chains that can more easily afford the costs of parking. Businesses can still provide parking if they see fit, but we should not require an excess of an expensive and environmentally damaging parking spaces. In doing so, we also help encourage people to travel by means other than personal cars, which will make these methods safer and more accessible for everyone.	N	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	None		
907	Tom Dimond	Transportation	Provide hiking and biking trails that are separated from road (Mississippi River Trail along Point Douglas Road)	N	The city-wide Bike Plan sketches such a system of trails, which often also accommodate pedestrians.	None		

908	Tom Dimond	Transportation	<p>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.</p>	N	<p>Pedestrian and bicycle safety are greatly emphasized by the plan, as is access to the Mississippi River. Separated trails are often an appropriate treatment, as are sometimes grade-separated crossings. Policies support consideration of such treatments. Exact treatments are guided by the Street Design Manual and specific modal plans (Bike and Pedestrian Plans).</p>	None		
909	Tom Dimond	Transportation	<p>We must demand nothing less than a city where:</p> <ul style="list-style-type: none">* 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* equitable transit investment	N	<p>These concepts are largely supported by the plan, except over/underpasses are not explicitly prescribed, and transit policies do not explicitly call for 24-hour transit. Over/underpasses are not always appropriate, but can be considered in pursuit of safety, which is a major policy emphasis in the draft. Street Design Manual will guide their use.</p>	None		
910	Tom Dimond	Transportation	<p>Wherever you go in Saint Paul we should feel safe including clean air, clean water, clean soil, and safe hiking and biking paths.</p>	N	<p>Yes, absolutely. Community health, climate resiliency, and safety are all emphases of the plan.</p>	None		
911	Tom Dimond	Transportation	<p>T-14 - add - " and provide pedestrian, and bicycling bridges over transportation to connect neighborhoods to the riverfront" (page 56)</p>	N	<p>The Transportation, Parks, Land Use and Mississippi River Corridor Critical Area chapters encourage connections to the Mississippi River and ped/bike safety improvements. Bridges over RR tracks may be appropriate in pursuit of those aims, but should not be prescribed by the Comp Plan.</p>	None		

912	Tom Dimond	Transportation	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))	N	The Transportation Chapter encourages a "working river," including barge transportation and support for jobs in river-related industries. Although there are also policies in the Land Use, Parks, and Transportation chapters to support recreation and public use/access along the river, we are making the commitment to pursue both sets of aims as much as possible. The nine themes and priorities from our community engagement support this approach, as does the balance of "economic development" and "resiliency" lenses.	None		
913	Tom Dimond	Transportation	T-38&39 - support - land bridge might be a better name than freeway lid (page 58)	Y	We agree.	Revise Policy T-39: "...such as "freeway-lids" "land bridges" and..."	58	
914	Tom Dimond	Transportation	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)	N	Currently, "parkway" design guidelines are lightly covered in the Street Design Manual. Consider this comment if/when parkway guidelines are established, which is beyond the scope of the Comp Plan.	None		
915	Tom Dimond	Transportation	Page 75 - remove Kittson extension (page 75&76)	N	Kittson extension should be studied before implementation, but it could have a positive benefit and should remain on the map.	None		
916	Tom Dimond	Transportation	Page 80 - Midtown Greenway extension into Saint Paul - support - this should be a high priority (page 80)	N	Comment acknowledged.	None		
917	Tom Dimond	Transportation	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.	N	Excellent thought. This appears to be covered by a combo of policies T-41 and T-42 (tech), and T-15 (freight delivery to support businesses and foster ped safety).	None		
918	Tom Dimond	Transportation	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.	N	The Transportation Chapter supports intermodal freight movement, including on rail.	None		

919	Tom Dimond	Transportation	Air freight carries high value fast delivery freight. Air is expected to be \$5.2 billion in value and 600,000 tons in 2030.	N	The Transportation Chapter supports intermodal freight movement and maintaining a regional aviation system.	None		
920	Tom Dimond	Transportation	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.	N	Comment acknowledged.	None		
921	Tom Dimond	Transportation	The transportation plan should foster sustainable development while supporting a shift to more ecologically friendly and environmentally sustainable.	N	We agree, and used a sustainability/resiliency lens in developing the plan.	None		
922	Saint Anthony Park Community Council (SAP)	Transportation	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.	N	Comment acknowledged.	None		
923	Saint Anthony Park Community Council (SAP)	Transportation	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.	N	Comment acknowledged.	None		
924	Saint Anthony Park Community Council (SAP)	Transportation	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.	N	Policy T-39 supports freeway lids, generally.	None		
925	Saint Anthony Park Community Council (SAP)	Transportation	We applaud the Goal 2, which is to improve safety and accessibility for all users.	N	Comment acknowledged.	None		

926	Saint Anthony Park Community Council (SAP)	Transportation	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.	N	It is currently illegal to cite the owner of speeding car rather than the driver. State or local law may need to change to deal with autonomous vehicles. Policy T-41 supports ensuring that new transportation tech furthers City priorities, which include pedestrian safety. We believe that would cover supporting law changes to enforce against speeding by AVs.	None		
927	Saint Anthony Park Community Council (SAP)	Transportation	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.	N	Comment acknowledged.	None		
928	Saint Anthony Park Community Council (SAP)	Transportation	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.	Y	In fact, this connection is in an adopted plan. As a major new arterial-level street connection, we should add it to the map.	Add Prior/Transfer connection to Map T-14 as called for in the West Midway Industrial Area Plan.		
929	Saint Anthony Park Community Council (SAP)	Transportation	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.minneapolisiparks.org/_asset/895jfr/Chapter-4-Parks-Regional-Trail.pdf .	N	Comment acknowledged	None		

930	Saint Anthony Park Community Council (SAP)	Transportation	The proposed ten-year plan for Saint Anthony Park 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.	N	Coordinate this issue through the district plan process.	None		
931	Saint Anthony Park Community Council (SAP)	Transportation	<p>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:</p> <p>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.</p>	N	After much research and debate, "where feasible" is probably the best lingo we can use. Some road diets have worked on ADTs of up to 26K, while others as low as 15-20K can be very problematic. Other factors include #s of access points and types of adjacent land uses (retail, fast-food, schools, etc.).	None		
932	Saint Anthony Park Community Council (SAP)	Transportation	<p>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.</p>	N	Tabled crosswalks, speed bumps, and banning right-on-red are all tools that can be applied to improve pedestrian safety. Slip lanes (aka channelized right turns) are covered thoroughly in the Street Design Manual with an eye toward pedestrian safety.	None		
933	Saint Anthony Park Community Council (SAP)	Transportation	<p>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.</p>	N	Comment acknowledged	None		

934	Saint Anthony Park Community Council (SAP)	Transportation	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.	N	Policy T-17 ("Use pricing to manage parking demand...") already supports charging market rates in areas with high demand, which often includes permit parking areas. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	None		
935	Saint Anthony Park Community Council (SAP)	Transportation	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.	N	We don't think this is necessary, nor does it serve any real policy purpose. Basically, every LRT/BRT stop is a Neighborhood Node, which has a density range designation.	None		
936	Saint Anthony Park Community Council (SAP)	Transportation	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.	N	Snow removal details are too specific for the Comprehensive Plan. Draft Pedestrian Plan deals with snow removal in more detail.	None		
937	Saint Anthony Park Community Council (SAP)	Transportation	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.	Y	This would require a separate study.	New Medium-Term Implementation Chapter item in Figure I-2: " <u>Evaluate how and where trucks should be accommodated in street and site design to maintain economic vitality while prioritizing pedestrian and bicyclist safety. Then revise the truck route map, Street Design Manual, City ordinances and other official policies accordingly.</u> "		
938	Saint Anthony Park Community Council (SAP)	Transportation	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.	Y	Incorporate this concept into T-42.	Amend Policy T-42: "Ensure that right-of-way design and management accounts for changing vehicle technologies and forms of use, such as automated vehicles; car-sharing, <u>curbside pickup and delivery</u> , <u>ride-hailing</u> and ride-sharing.		

939	Saint Anthony Park Community Council (SAP)	Transportation	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.	N	Idea noted for potential implementation. No need for policy change in plan document.	None		
940	Saint Anthony Park Community Council (SAP)	Transportation	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.	Y	Bike parking near LRT was intended to be covered in Policy T-28, but could be more explicit. Proposed revisions have been run by Chief Resiliency Officer Stark.	Amend Policy T-28 "Facilitate intermodal trips at mobility hubs (where transportation modes convene or intersect <u>walking, biking, public transit, ridesharing and carsharing are intentionally designed to connect</u>) by providing enhanced security, lighting, information, <u>shelter, placemaking,</u> comfort and convenience."		
941	Saint Anthony Park Community Council (SAP)	Transportation	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.	N	One of the roles of the Comprehensive Plan is to guide the expenditure of City funds to build, improve and manage publicly-owned and maintained facilities. The City's first focus should be on public streets.	None		
942	Saint Anthony Park Community Council (SAP)	Transportation	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.	N	They mean Map T-3. The map is straight from the Bike Plan, reproduced here for info purposes. Can provide to Public Works for consideration of Bike Plan amendment.	None		
943	Saint Anthony Park Community Council (SAP)	Transportation	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.	N	It is outside the Comprehensive Plan scope to change road classifications. Can provide to Public Works for consideration.	None		
944	Saint Anthony Park Community Council (SAP)	Transportation	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.	N	Comment acknowledged. Any reconsideration of Ayd Mill Road should be done in a separate process.	None		

945	Saint Anthony Park Community Council (SAP)	Transportation	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.	Y	Agree	Update Map T-15 with latest land use info. If Weyerhaeuser still shows as Industrial, then at least change that site's designation. Add "potentially inadequate turning radii" icon to 280/Franklin intersection.		
946	Saint Anthony Park Community Council (SAP)	Transportation	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.	Y	Agree	and Appendix C (Anton/Mike). 1. In Appendix A, add an asterisk to the title of Map T-18. In the map's legend area, similar to Map T-11, add this language: <u>“*See Appendix C for Transit Market Areas descriptions.”</u> 2. Add the following text to Appendix C under a new #6: <u>“Transit Market Areas are Metropolitan Council designations that indicate the likely cost effectiveness of transit service investments. Transit Market Area I has the potential transit ridership necessary to support the most intensive fixed-route transit service, typically providing higher frequencies, longer hours, and more options available outside of peak periods. Market Area II can support many of the same types of fixed-route transit as Market Area I, although usually at lower frequencies or shorter service spans. Market Area III primarily supports commuter express bus service with some fixed-route local service providing basic coverage. Market Area IV can support peak-period express bus services if a</u>		

947	Saint Anthony Park Community Council (SAP)	Transportation	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.	N	No policy needed. Such situations can be covered through local HPC designation, if appropriate, and inclusion in district plans.	None		
948	Dan Marshall and Millie Adelsheim	Transportation	We strongly believe that the comprehensive plan should value the needs of people over cars. For too long, city planners have placed vehicle throughput and parking over pedestrian safety, bicycle safety, and livability.	N	Policy T-3 establishes such priorities for transportation design.	None		
949	Dan Marshall and Millie Adelsheim	Transportation	The following policies should be included in the Comprehensive Plan: • Road diets and traffic calming should be part of each and every road construction project. Streets should be narrowed, speeds should be reduced, sidewalks added or improved, slip lanes eliminated, and bike lanes added. Many of our neighborhood streets are built like highways and the results are predictably and avoidably deadly. This needs to change as quickly as possible throughout the city.	N	Plan already supports these concepts. Road diets can always be considered, but will not always be effective/appropriate (e.g. I-94 down to 1 lane in each direction). Slip lanes covered thoroughly in the Street Design Manual, with an eye toward pedestrian safety.	None		
950	Dan Marshall and Millie Adelsheim	Transportation	The following policies should be included in the Comprehensive Plan: • Parking minimums should be eliminated throughout the city.	N	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	None		
951	Dan Marshall and Millie Adelsheim	Transportation	The following policies should be included in the Comprehensive Plan: • The city should end the practice of playing favorites with parking by eliminating resident-only parking restrictions. Parking meters should be used instead where on-street parking demand exceeds capacity.	N	Resident-only parking will be evaluated for changes, but will not be eliminated - it is an important impact mitigation tool for residential areas near LRT/BRT and high-activity commercial zones, especially for residents without off-street parking. The pricing of parking where demand is high is called for in T-17.	None		
952	Karen Allen	Transportation	I am very support of the broad up-zoning plans, the Neighborhood Node concept and increased focus on density and public transportation.	N	Comment acknowledged.	None		

953	Karen Allen	Transportation	<ul style="list-style-type: none"> • LU-13 Change “reduce parking minimums” to “eliminate”. Especially pertinent for small multi-family residences (duplex up to ‘missing middle’ style buildings) 	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall</u> ." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
954	Karen Allen	Transportation	<ul style="list-style-type: none"> • Eliminate Permit Only Parking or at least charge a market rate for neighborhood permit holders. 	N	Covered by Policy T-17.	None		
955	Karen Allen	Transportation	<ul style="list-style-type: none"> • Autonomous vehicles are overhyped and we should not give over our transportation infrastructure to powerful corporations. 	N	Comment acknowledged	None		
956	Heidi Schallberg	Transportation	I greatly appreciate the city's stated priority for pedestrians first in a modal hierarchy (Policy T-3). This should not be limited only to design; maintenance and operations must also be included. Construction often is allowed to create unsafe conditions for pedestrians where sidewalks are closed yet direct routes are maintained for drivers first.	N	Comment acknowledged. Operations details are too specific for the Comprehensive Plan. The draft Pedestrian Plan deals with operations in more detail.	None		
957	Heidi Schallberg	Transportation	Policy T-32 on construction needs to have the same modal priority applied to it. Snow and ice also endanger pedestrians trying to safely walk to their destinations.	N	Snow removal details are too specific for the Comprehensive Plan. The draft Pedestrian Plan deals with snow removal in more detail.	None		
958	Heidi Schallberg	Transportation	I have appreciated the city's widespread adoption of leading pedestrian intervals, and Policy T-7 is a much needed approach citywide.	N	Comment acknowledged.	None		
959	Heidi Schallberg	Transportation	Policy T-11 should emphasize drivers in education. It is not a 50/50 shared responsibility when only one party (the driver) has the weapon that inflicts the harm. Drivers still have responsibilities to drive with due care.	N	Policy T-11 encourages education in pursuit of safety. Emphasizing drivers' outsized role in road safety does not change the policy impact. Valuable programs like "Stop for Me" would still be fully supported by the policy in its current wording.	None		
960	Saint Paul Bicycle Coalition	Transportation	<ul style="list-style-type: none"> • 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. 	N	After much research and debate, "where feasible" is probably the best lingo we can use for the road diet policy. The work team spent much time debating these action words in general, opting for the most pointed phrase that we could. The Transportation Committee, in turn, sharpened a few of them further.	None		

961	Saint Paul Bicycle Coalition	Transportation	<ul style="list-style-type: none"> • 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. 	Y	The Street Design Manual (SDM) provides guidance, but staff agrees it is reactive to existing truck traffic and not proactive about exploring ways to move large truck design accommodations away from pedestrians and bikes. The SDM, it should be noted, discourages slip turns. Staff believes this warrants a full separate study.	New Medium-Term Implementation Chapter item in Figure I-2: " <u>Evaluate how and where trucks should be accommodated in street and site design to maintain economic vitality while prioritizing pedestrian and bicyclist safety. Then revise the truck route map, Street Design Manual, City ordinances and other official policies accordingly.</u> "	211	
962	Saint Paul Bicycle Coalition	Transportation	<ul style="list-style-type: none"> • 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. 	N	The tension between industrial and natural along the Mississippi River is a delicate, but significant, situation. We have attempted to aim for both jobs and nature. Policy T-19 specifically uses the word "maintain" to imply that industrial uses are not meant to expand along the river, but they retain importance.	None		
963	Saint Paul Bicycle Coalition	Transportation	<ul style="list-style-type: none"> • 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. 	N	Many/most of the other Transportation Chapter policies provide this direction. No need to repeat within Policy T-21.	None		
964	Saint Paul Bicycle Coalition	Transportation	<ul style="list-style-type: none"> • Policy T-28 should encourage bike racks or other secure bike parking at multimodal hubs. 	Y	Bike parking near LRT was intended to be covered in Policy T-28, but could be more explicit. Proposed revisions have been run by Chief Resiliency Officer Stark.	Amend Policy T-28 "Facilitate intermodal trips at mobility hubs (where transportation modes convene or intersect <u>walking, biking, public transit, ridesharing and carsharing are intentionally designed to connect</u>) by providing enhanced security, lighting, information, <u>shelter, placemaking,</u> comfort and convenience."		
965	Saint Paul Bicycle Coalition	Transportation	<ul style="list-style-type: none"> • 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. 	N	"Generally" is appropriate for how this policy will realistically be implemented. The priority is clearly stated for pedestrian/bike detours and will have the proper effect with our own projects and those of our partners.	None		
966	Saint Paul Bicycle Coalition	Transportation	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.	N	Comment acknowledged.	None		

967	Towerside Innovation District	Transportation	These important strategies for job creation and job density along major public transit promotes the City of Saint Paul’s and Towerside’s core values of resilience, climate protection, and equity.	N	Comment acknowledged.	None		
968	Shannon O'Toole	Transportation	There seems to be very little up to date data backing up the assumptions, particularly with regard to transportation.	N	Not sure what the comment refers to, even on re-review of the policy language.	None		
969	Shannon O'Toole	Transportation	I am a person who uses public transportation whenever possible so I understand that without a massive capital infusion, the public transportation system will continue to be piecemeal and unsuitable for families and for many others.	N	Comment acknowledged.	None		
970	Shannon O'Toole	Transportation	The transportation vision is very family unfriendly which is odd since St. Paul is fast becoming a bedroom community with fewer and fewer jobs.	N	Not sure what the comment refers to, even on re-review of the policy language.	None		
971	Shannon O'Toole	Transportation	Lastly, the suggestions that Ayd Mill Road should be connected to I-94 on pages 75 and 80 were noticed. Please go back to the suggestions made when Randy Kelly wanted to connect Ayd Mill Road to I-94 - most people wanted a bike and pedestrian way with the stream recovered. What a great and futuristic way to improve the bike, pedestrian, and water resources of the city! The last thing we need is another freeway abutting District 16. Improve the I-35E - I-94 westbound connection downtown if that is needed and close down Ayd Mill Road to automobile traffic.	Y	The map shows future ROW - it does not dictate design, which could be a bike/pedestrian way as suggested. Design will be done through future study. Some language change is appropriate to ensure clarity.	Change title of Map T-14 to "Potential Future Right of Way Connections". Change labels to "Ayd Mill Corridor," "Kittson Corridor," and "Pierce Butler Corridor."		

972	Jessa Anderson-Reitz	Transportation	We should follow the Minneapolis 2040 plan and relax government restrictions on multi-family housing throughout the city and eliminate parking requirements.	Y	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall</u> ." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
973	Jessa Anderson-Reitz	Transportation	Higher population densities will make it financially practical to add more numerous and frequent transit options, making it more practical for St. Paulites to live without a car.	N	We agree	None		
974	Jessa Anderson-Reitz	Transportation	More people walking and taking transit will mean better public health, a stronger sense of community, and the greater public safety that results from more “eyes on the street.”	N	We hope so. These are major anticipated benefits to "livability" in St. Paul.	None		
975	Kody Sherlund	Transportation	I think the city needs to focus on a handful of themes to achieve this vision: 1) Human-scale, ground-level development that encourages non-auto modes of transportation, like walking, cycling, scooters, buses, street cars, etc.	N	Goal 4 and its policies further this.	None		
976	Kody Sherlund	Transportation	Increasing the viability of these features (like walkability) improve quality of life, safety, and the success and vibrancy of local businesses.	N	Agreed.	None		

977	Kody Sherlund	Transportation	The single most effective way the city can influence increasing the supply of housing is to change zoning laws (allow for duplexes, triplexes, townhomes, and the "missing middle" in general) and to promote infill without minimum parking requirements.	Y	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall</u> ." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
978	Kody Sherlund	Transportation	If mandatory parking spaces must come with development, incentivizing driving cars will continue, and valuable urban space is wasted on storing cars.	N	Agreed	None		
979	Kody Sherlund	Transportation	I think we agree that the future of the city is not 100% car-centric. People drive because it's convenient - what would the city be like if other modes of transportation were more convenient than driving? If taking the bus, train, or riding a bike downtown is a better option than driving, more people will do it!	N	Comment acknowledged.	None		
980	Barry Reisch	Transportation	I hope the City of St. Paul will plan as part of its vision to focus on the destruction of our roadways and environment by excessive salt use. We are very destructive as we bomb our roads with salt in the winter and then spend thousands of dollars repairing the damage in the spring, summer and fall. This process also contributes to climate change with the large amounts of fuel consumed by our trucks, all the oil consumed in repaving and repairing roads, etc.	Y	Covered directly by policy WR-17 and indirectly by WR-16. Could also add "environmental sustainability" concept (including salt use) to existing maintenance policy.	Revise the second T-34: "Pursue fiscally- <u>and environmentally</u> -sustainable models for equitably maintaining transportation infrastructure..."		
981	Barry Reisch	Transportation	Many of our roads are in atrocious condition including our downtown streets. I can imagine the costs involved in all of this process, plus resources consumed, and environmental degradation. There simply has to be a better way and I would be glad to work on that plan.	N	Comment acknowledged.	None		

982	Scott Berger	Transportation	Perhaps more importantly, we have a real need to decrease our immense dependence on the automobile--even for intra-city trips.	N	We agree. Goal 4 and its policies further this.	None		
983	Scott Berger	Transportation	We can do better on transit, walking, and biking.	N	We agree.	None		
984	Scott Berger	Transportation	I love driving, but I know that putting all our eggs in the car basket is myopic thinking.	N	Comment acknowledged.	None		
985	Jeff Zaayer	Transportation	Policy LU-22 calls for "strengthening neighborhood connections to and within downtown Saint Paul through development and improvements that support and complement Downtown businesses and urban villages" A primary factor that limits connectivity between downtown and surrounding neighborhoods is the freeways and river that surround it. Though land use can partially address this disconnect, it would be better addressed by specific walking and bicycling improvements on routes into and out of downtown such as those identified in the city's bike plan and transportation chapter.	N	The Bike Plan has specifics for the Capitol City Bikeway in downtown, which will provide better bike facilities within downtown and connecting to local and regional trails on the edge of downtown. T-33 calls for better connections to the river, and T-39 addresses improved connections across highways.	None		
986	Jeff Zaayer	Transportation	Policy LU-34 calls for "providing for multi family housing along arterial and collector streets to facilitate walking and leverage the use of public transportation" Given the public health impacts of exposure to particulate pollution caused by vehicles, as well as the effects of long term exposure to noise that interrupts sleep, I believe that multi family housing should not be exclusively promoted along busy corridors such as Marshall and Snelling Avenues. Because people of color and low income people as well as other underrepresented groups live in multi family housing at far higher rates than white and higher income people. Focusing multi family housing development near noisy, polluted roads while preserving quiet neighborhoods with clean air for those who can afford single family homes is a massive equity issue. I would like to see the comp plan provided for not only along arterial and collector streets but across the city. In addition to equity benefits, this would allow for the density needed to support walkability and high quality public transportation.	N	Multi-family housing is supported within the areas designated as Urban Neighborhoods as well.	None		
987	Jeff Zaayer	Transportation	Policy T-2 aims to "prioritize transportation projects and ensure well maintained infrastructure that benefits the most people" by using surface condition and multimodal usage rates. This policy is well-intentioned but may end up disproportionately benefiting drivers given that most infrastructure across the city currently serves drivers first and everyone else second. By instead focusing on the most vulnerable road users (pedestrians and cyclists)and making improvements with their safety and comfort in mind, these modes of transportation can become more attractive and therefore more popular and increase their usage rates. A nice side benefit of such improvements is that they typically improve safety fro motorists as well, and therefore making these roads better for everyone.	N	Per Policy T-1, safety and equity are prioritized. Policy T-2 allows our dollars to go farther and will allow more to get done in the long run.	None		
988	Jeff Zaayer	Transportation	A policy that explicitly aims to serve the most vulnerable users first would be more beneficial and would work toward several goals while also supporting several other policies throughout the chapter most notably T-3.	N	Policy T-3 does this.	None		

989	Jeff Zaayer	Transportation	Map T-14 Future Right of way needs: this map is concerning as the two larger corridors of identified need occur in ACP50 portions of the city and all 3 cut through valuable industrial land and park space. I hope the city takes serious consideration into the damage these high traffic corridors would do not only to the tax base in Saint Paul but also to the community impact of barriers that corridors like these can create in addition to the health disparities by putting more people in proximity to high traffic corridors.	Y	The map shows future ROW - it does not dictate design, which could be a bike/pedestrian way as suggested. Design will be done through future study. Some language change is appropriate to ensure clarity.	Change title of Map T-14 to "Potential Future Right-of-Way Connections". Change labels to " <u>Ayd Mill Corridor</u> ," " <u>Kittson Corridor</u> ," and " <u>Pierce Butler Corridor</u> ."		
990	Cory Zwiefelhofer	Transportation	I am glad that Saint Paul is looking far into the future and is doing a great job with this plan. However, I do not feel that it goes far enough in eliminating inequities in our society, combating climate change, or allowing for safe travel for all. Some areas which I feel this plan is lacking include:	N	Comment acknowledged	None		
991	Cory Zwiefelhofer	Transportation	1. Not clearly defining that the reduction in use of cars with respect to land use, transportation, and housing is one of the primary goals St. Paul needs to move to in 2040;	N	Policy T-21 calls for reducing vehicle miles traveled. Many policies in the Land Use chapter support higher-density mixed-use development along transit corridors.	None		
992	Cory Zwiefelhofer	Transportation	2. Eliminating parking minimums altogether needs to become public policy;	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall</u> ." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
993	Cory Zwiefelhofer	Transportation	3. Fixating on allowing higher densities only near arterial roads does nothing if that density is not mixed throughout neighborhoods as well. The best neighborhoods have density and diversity of people, businesses, churches, parks, and other uses of a city. In addition, many of St. Paul's arterial roads need road diets before density were to occur on them; by discouraging pedestrian traffic, St. Paul is actively working against the vibrancy of a neighborhood.	N	Road diets encouraged by Policy T-6.	None		
994	Cory Zwiefelhofer	Transportation	6. Ayd Mill Road should not be redeveloped with cars in mind; they should not be allowed.	N	Map T-14 indicates future ROW location, but not design - a bike/pedestrian only connection could be considered, but that is beyond the scope of the city-wide Comprehensive Plan.	None		

995	Jake Reuter	Transportation	Parking minimums should be eliminated from Saint Paul's zoning code. Establishing artificial floors on the number of parking spaces that a development must provide increases the cost of development and ultimately rent or businesses and residents, regardless of whether or not they need the parking.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall</u> ." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
996	Jake Reuter	Transportation	People walking, bicycling, and taking transit should be given priority over infrastructure improvements for single-occupancy vehicles and parking spaces. Our city's transportation system should serve people, not metal boxes that carry people around.	N	Policies T-1 and T-3 further this.	None		
997	Jake Reuter	Transportation	Saint Paul should experiment with transitioning residential streets into woonerfs that could allow for additional gardens, play space, etc. We should take back some of the massive amount of space that is given to cars in this city and make it a place for people to live and play.	N	Policy T-38 calls for improving the environmental sustainability of rights-of-way, which could include woonerfs. Convertible streets (woonerfs) are addressed in the Street Design Manual.	None		

998	Philip Bussey	Transportation	I think this comprehensive plan should recognize the negative impact that exclusively zoning for single family homes has done to our city and allow for multi family dwellings throughout the entire city, increase where mixed-use buildings are allowed, and remove parking minimums.	Y	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall</u> ." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
999	Nicholas Rossini	Transportation	My name is Nicholas Rossini, and I want St. Paul by 2040 to have finished its already studied streetcar proposed routes (along with the W 7th one), increase LRT transit options in more corridors, and put a cap over highway strangling portions of downtown St. Paul.	N	Increased transit and freeway caps are supported in the Plan.	None		
1000	Nicholas Rossini	Transportation	Also the need for RAIL transit throughout Minnesota in general needs to be improved with high speed rail (not slow Amtrak that shares rail lines with freight).	N	Comment acknowledged	None		
1001	Brendan O'Shea	Transportation	Ensure that policy T-14 does not conflict with policy T-3; freight corridors are also used by cyclists and pedestrians, and their safety as vulnerable users should be prioritized in all Saint Paul streets. Streets can be both safe and commercially productive.	Y	The Street Design Manual provides guidance, but staff agrees it is reactive to existing truck traffic and not proactive about exploring ways to move large truck accommodations away from pedestrians and bikes. The SDM, it should be noted, discourages slip turns.	New Implementation Chapter item in Figure I-2: " <u>Evaluate how and where trucks should be accommodated in street and site design to maintain economic vitality while prioritizing pedestrian and bicyclist safety. Then revise the truck route map, Street Design Manual, City ordinances and other official policies accordingly.</u> "		

1002	Kathryn Noble	Transportation	As recently reflected by comments from a number of members from the community, the draft 2040 plan is not ambitious enough as it relates to transportation planning.	N	Comment acknowledged.	None		
1003	Kathryn Noble	Transportation	St. Paul is currently very car-centric with single use parking lots and street parking, which makes for very inefficient and costly use of valuable space.	N	Comment acknowledged.	None		
1004	Kathryn Noble	Transportation	The city needs to limit or completely eliminate "drive thrus" within city limits (Starbucks on Marshall/Snelling and a proposed Dunkin Donuts at Hamline and Larpenteur, rejected rightly by the city).	N	Comment acknowledged.	None		
1005	Kathryn Noble	Transportation	Other suggestions are to consider the possibility of alleyway and sidewalk snow removal, idling vehicle bans in residential areas, traffic calming measures in urban arteries (Larpenteur, Energy Park, Rice being chief culprits), prioritizing multimodal transportation (including bikeshare which is very disappointing at the moment), organic recycling collected at the alleyway, and more mixed use developments at key areas.	N	Equitable snow maintenance, traffic calming, and prioritizing multimodal transportation are all supported by the Transportation Chapter policies.	None		
1006	Michael Healy	Transportation	The plan looks great except for one major flaw. It needs to be amended to call for the elimination of minimum off-street parking requirements, at least for commercial and industrial businesses and possibly some types of residential development as well. The policy goal could be formatted as something along the lines of "The City will eliminate minimum parking requirements for commercial and industrial properties and explore the elimination or reduction of minimum parking requirements for residential properties."	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
1007	Michael Healy	Transportation	The usefulness of minimum parking requirements has been thoroughly debunked and they have very little support these days from anyone who takes the issue seriously. The requirements are even starting to lose support in rural areas and amongst conservatives, despite their "pro-car" attitudes, because minimum parking requirements are anti-business and flat-out don't work well. Minimum parking requirements represent an unnecessary and heavy-handed "big government" intervention into the marketplace which attempts to solve a problem that doesn't even exist. Most businesses that need parking are going to build parking as they won't be able to get bank financing otherwise. Developers will build the type of parking that they need to build to keep their tenants happy. The free market will figure parking out and 99% of the time will do a better job than the zoning code's arbitrary parking requirements. Cities kill or hurt good projects all the time by making an arbitrary determination that "there isn't enough parking." The business then either has to try to get a variance (costly, time-consuming, and prone to sabotage by neighborhood groups and other businesses) or has to buy up neighboring properties to bulldoze them and put up more parking. More often than not, this results in an oversized parking lot that sits at least partially empty most of the time. Also, the City loses the tax base from the buildings that had to be bulldozed to create the parking.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		

1008	Michael Healy	Transportation	<p>Parking costs of lot of money to build. Building unnecessary extra parking stalls (surplus stalls built just to please the City) drives up the cost of development. Structured parking generally ends up costing somewhere between \$20,000-\$30,000 per parking stall. Surface parking is cheaper (but still not cheap) but it eats up a ton of land and makes a neighborhood uglier and less walkable. Nobody wins when there is "too much" parking, both the property owner and the City are losers in that situation. It doesn't seem reasonable to talk about wanting development and housing to be "affordable" but then turn around and impose unnecessary mandates that drive up development costs and make everything less affordable. Developers are going to build parking if their project needs parking. There's no benefit in having the City require even more parking beyond what the free market is already providing, especially when our stated goal is encouraging people to drive less and consider using transit or active transportation.</p>	Y	<p>PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.</p>	<p>Edit Policy LU-13: Change "minimums" to "<u>overall</u>." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u></p>		
1009	Michael Healy	Transportation	<p>Minimum parking requirements have caused immense harm to American cities since their widespread adoption in the 1960's. None of Saint Paul's most interesting/walkable neighborhoods would be allowed to be built today because of minimum parking requirements. Selby/Dale, Grand Avenue, Snelling/Selby, and all of the cute little streetcar nodes fail to have "enough" parking under the code and would not be allowed to be built in 2018.</p>	Y	<p>It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.</p>	<p>Edit Policy LU-13: Change "minimums" to "<u>overall</u>." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u></p>		
1010	Michael Healy	Transportation	<p>It would be a huge missed opportunity if we failed to include this goal in our 2040 plan. Honestly, I don't think its possible to achieve any of the other goals regarding walkability, housing affordability, increased transit usage, etc. if this issue isn't addressed. By 2040, most cities aren't going to have minimum parking requirements, everything is moving in that direction. Saint Paul has an opportunity to be a leader in this. Please, let's get some language in our comprehensive plan!</p>	Y	<p>It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.</p>	<p>Edit Policy LU-13: Change "minimums" to "<u>overall</u>." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u></p>		
1011	Tom Basgen	Transportation	<p>We should be seeking to double or triple our transit ridership numbers, triple or quadruple our biking and walking trips.</p>	N	<p>That's almost exactly what's called for in the transportation section of the Implementation Chapter (in Item 10).</p>	<p>None</p>		
1012	Tom Basgen	Transportation	<p>We need to be spending our money on things that actually return on investment. Specifically not cars, specifically not cops.</p>	N	<p>Comment acknowledged.</p>	<p>None</p>		

1013	Alicia Valenti	Transportation	Policy T-2 aims to “prioritize transportation projects and ensure well-maintained infrastructure that benefits the most people” by using surface condition and multi-modal usage rates. This policy is well-intentioned, but may end up disproportionately benefiting drivers, given that most infrastructure across the city currently serves drivers first and everyone else second. By instead focusing on the most vulnerable road users (pedestrians and bicyclists) and making improvements with their safety and comfort in mind, these modes of transportation can become more attractive and therefore more popular, increasing their usage rates. A nice side benefit of such improvements is that they typically improve safety for motorists as well, making the roads better for everyone. A policy that explicitly aims to serve the most vulnerable users first would be more beneficial, and would work toward several goals while also supporting several other policies throughout the chapter (such as, notably, T-3).	N	Per Policy T-1, safety and equity are prioritized. Policy T-2 allows our dollars to go farther and will allow more to get done in the long run.	None		
1014	Kathy Sidles	Transportation	All development proposals such as the Rush Line and Pig’s Eye rail upgrade should include an assessment of natural areas lost and degraded and impacts on endangered species before project approval. For example, environmental assessment of the Rush line bus lane replacement of the Vento Trail is being done after approval.	N	Such projects require environmental review under Federal and State law.	None		
1015	Kathy Sidles	Transportation	3. All parts of the metro area can have a protected neighborhood corridor. Give Rail Roads, highway right of ways, buried stream and waste water green spaces names, protect them, pick up the trash and enhance them.	N	Comment acknowledged	None		
1016	Kathy Sidles	Transportation	4. The Bruce Vento Bike Trail could become a Regional Park and enhanced for wildlife instead of a bus lane. The high density of diverse families along it would then have access to Regional Park programming. As with the Snelling buses, public transit to all parts of the metro can go where the riders are - White Bear, Maryland, English, Phalen Boulevard to BRT on 35E. We need both trails and public transit to compete with the suburbs for business and homeowners and prevent urban sprawl.	N	Rush Line BRT planning is a separate process led by Ramsey County. The Comp Plan supports studying that BRT line but does not predefine the Vento Trail interface or precise BRT guideway location.	None		
1017	Stuart and Mary Ellen Knappermiller	Transportation	We need safe usable commuter bike lanes from our Payne Phalen neighborhood to the Ford Plant development, to the Greenway, to the State Fair, to White Bear Lake, downtown MPLS, Wisconsin, to Cottage Grove, Eagan.	N	Will pass along to Public Works for Bike Plan consideration and implementation.	None		
1018	Stuart and Mary Ellen Knappermiller	Transportation	We need the Ped Plan and bike plan to be implemented well.	N	Comment acknowledged.	None		
1019	Stuart and Mary Ellen Knappermiller	Transportation	With Ramsey County's help we need more and more streets made traffic predictable like has been done on our section of Maryland Ave.	N	Policy T-6 calls for implementing road diets where feasible.	None		
1020	Stuart and Mary Ellen Knappermiller	Transportation	We need roundabouts to replace as many dangerous intersections as can be.	N	Roundabout use and design are covered by the City's Street Design Manual.	None		

1021	Stuart and Mary Ellen Knappermiller	Transportation	We need affordable housing and an increase in density and better transit.	N	We agree. These are fundamental goals in the 2040 Comprehensive Plan.	None		
1022	Stuart and Mary Ellen Knappermiller	Transportation	Our corridors should have apartments with first floor businesses that people will use, not the development at the intersection of Arcade and Maryland where a one story building stands mostly empty because there isn't enough slow car traffic/foot traffic/bike traffic to support a bike shop, etc. These buildings need to be LEED certified with rain capture for graywater use and solar on the roof.	N	Comment acknowledged	None		
1023	Stuart and Mary Ellen Knappermiller	Transportation	My wife and I need clear sidewalks to walk the mile plus to Mississippi Market or to businesses on Payne, as you can't afford to have us drive a combustion engine car and we don't want to use the bus as it doesn't get us the exercise that will keep us paying taxes for several more decades.	N	Comment acknowledged.	None		
1024	Stuart and Mary Ellen Knappermiller	Transportation	We need to tap into our elders - 2,000 live in the PPCC area -to help children walk SRTS, tutor in schools, volunteer in our rec centers, for our police and firefighters.	N	We agree; they are an incredible resource.	None		
1025	Stuart and Mary Ellen Knappermiller	Transportation	We need to connect as citizens to make our parks and water and homes and businesses places of vibrancy, especially because our daughter in law says she fits in better walking at Phalen than her Euro- American in laws do.	N	Comment acknowledged.	None		
1026	Michael Sonn	Transportation	We should be talking about major investments in housing and bike/walk focused transportation.	N	We are.	None		
1027	Michael Sonn	Transportation	We should be discussing eliminating parking minimums city-wide.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall</u> ." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		

1028	Michael Sonn	Transportation	<ul style="list-style-type: none"> 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). 	N	Per Policy T-1, safety and equity are prioritized. Policy T-2 allows our dollars to go farther and will allow more to get done in the long run.	None		
1029	Andrew Singer	Transportation	In many respects, this is an excellent plan. I love that, in infrastructure design and decision making, it prioritizes street users by speed, from slowest to fastest—pedestrians, cyclists, transit, cars/trucks.	N	Comment acknowledged.	None		
1030	Andrew Singer	Transportation	Policies like T-3, T-5, T-7, T-20, T-21, T-22, T-37 are a huge leap forward for the city and I am super grateful they were included.	N	Comment acknowledged.	None		
1031	Andrew Singer	Transportation	There is a lot of clear language and good ideas in the plan but there is also some vague “word salad” where the intent of the language is difficult to decipher.	N	Comment acknowledged.	None		
1032	Andrew Singer	Transportation	This ["word salad"], some highway projects mentioned only in the Maps and Appendix section, and some other areas where I find the plan lacking will be my focus.	N	Comment acknowledged.	None		
1033	Andrew Singer	Transportation	Page 52, lower left paragraph, it says: “Since opportunities to remake streets are infrequent due to limited funds and a high volume of needs (the life expectancy of Saint Paul streets is approximately 40 years, and many go 90 years or more before being reconstructed), the chapter establishes clear priorities for project selection. Projects will prioritize safety and equity benefits, followed by support for quality jobs. Maintenance is also established as a “first cut” for project selection, because regular maintenance is much more cost-effective in the long run and allows for a greater number of projects to be accomplished over time. Further, the ability to obtain outside funding will be considered.” First off, you never define what “first cut” means ...and you say “maintenance is much MORE cost-effective” but never define “than what”. Is it more cost-effective than new construction? If so, you need to say that in a complete sentence.	N	"First cut" will be easily understood by the implementers; it is a way to prioritize the use of public funds. Regular maintenance is much more cost-effective in the long run <u>than full reconstruction or more major maintenance</u> (think the upcoming Robert Street project, which is like a major maintenance/reconstruction hybrid). The point is that regular maintenance makes our transportation dollars go farther.	None		
1034	Andrew Singer	Transportation	Then you don’t define “equity”. Do you mean “equity between modes” (bike, pedestrian, transit, car)? ...or do you mean racial equity as in “we have to prioritize this project because it’s in a largely Hmong or African American neighborhood”? This is important because, as written, “Safety and equity” are more important than “maintenance” or the age of a given piece of infrastructure.	Y	We mean racial and social equity.	Amend T-1 to read: Prioritize safety <u>and racial and social</u> equity benefits in project selection, followed by support....		

1035	Andrew Singer	Transportation	For example, my block hasn't been repaved since it was built in 1917, over 100 years ago. I have a picture of the brick and manhole covers with dates on them (used for this post). We still have a lead water line coming into my house. I'd like to update it when we get our street redone and save myself \$4000, but the city scrapped its RSVP program before it got to my street and now they're saying it might not be redone for another 10-20 years (after previously telling us it was going to be redone in 2014). My block is in a fairly affluent, white neighborhood. It is also not a bike or transit route (the other possible meaning of "equity" in this context). From the way this paragraph is currently written, I might therefore assume that my street is very low on the city's priority list. So clarity is important.	N	Equity is not about geographic balance.	None		
1036	Andrew Singer	Transportation	Finally, you don't say what "support of quality jobs" means. Yet, like "safety" and "equity", you place this above maintenance. So it's kind of important to define this. Do you mean "transportation access to quality jobs"? ...Or that you will prioritize a project if it pays city planners, engineers and contractors more money"? The term makes absolutely no sense. What is a "quality job?" One that pays more? More than what?	N	Comment was based on an earlier draft of the Plan. We've since revised to say "support of quality full-time, living wage jobs." It's not necessary to say "besides street construction jobs."	None		
1037	Andrew Singer	Transportation	We see this last problem in "Policy T-1". What does "equity" mean? What does "Support of quality, full-time, living wage jobs" mean? What does "Business support" mean? Does it mean that we will build a bunch of new streets, ramps and parking at taxpayer expense for some stadium developer? ...because that's what we've done for the MLS stadium and for CHS field. Is that more important than "condition and multi-modal usage rates" (in Policy T-2)?	N	We mean racial and social equity. The other items are better defined on a case-by-case basis.	None		
1038	Andrew Singer	Transportation	Personally, I think T-2 should be policy #1 ...and T-1 should be either T-2 or T-3 (and should be more carefully defined). If all three policies are to be considered equally and there is no hierarchy, you should state that at the outset of the plan chapter.	N	Hierarchy is pretty well established by the policies' language. Ranking of policies is not needed.	None		
1039	Andrew Singer	Transportation	For Policies T-1 and T-2, you need crash data and usage data to prioritize "safety", "multimodal usage rates" and "equity" (depending on what you mean by equity).	N	Better usage data for pedestrians and bikes would be great. Crash data is not an ideal measure for pedestrian/bike safety due to chronologically irregular crash patterns, as explained more fully in the 2016 Roadway Safety Plan. Safety is clearly established as a policy - the policy does not need to provide a ranking formula.	None		
1040	Andrew Singer	Transportation	Data collection and analysis or "Evaluation" is the most important part of "The Four E's" (Evaluation, Engineering, Enforcement and Education). The city now collects and maps some bicycle and pedestrian crash data, and it collects and lists some very limited pedestrian/bike count data. By contrast, car usage data is much more extensive— literally every street in the city gets counted and mapped.	N	Agreed. We're working on that.	None		

1041	Andrew Singer	Transportation	Bike/pedestrian count data is limited to just a dozen spots in the city. So I’d add a new policy for Goals #1 and #2 that says: “The City will endeavor to improve its collection of multimodal crash and count data, especially as regards pedestrians and cyclists. This includes adding the travel directions of crash participants as a reporting requirement for the Public Safety Department, because this will greatly assist the city in designing safer streets. It also includes expanding bicycle and pedestrian counts to more streets and intersections so we can assess the ‘Crash Per Crossing’ rates on different streets and intersections and prioritize ‘safety’ based, in part, on this data.”	N	No need to change the Transportation Chapter language. Data collection can be improved as needed to pursue these policies (safety, shift in modes).	None		
1042	Andrew Singer	Transportation	We also need data to evaluate how effective our engineering measures have been. On Marshall, for example, bike and pedestrian crashes have actually risen somewhat since we rebuilt the street with medians and bike lanes. Is this due to increased bike and pedestrian usage rates or a flaw in our design? Since we don’t have count data longer than half a year before project implementation (and only for a few spots), we have no idea whether our infrastructure spending improved safety or made it worse.	N	Comment acknowledged.	None		
1043	Andrew Singer	Transportation	The above discussion of data collection, analysis and “Evaluation” should also be mentioned in Policy T-5 under “components of the program.”	N	That's implied. Also covered by Implementation Chapter revision above.	None		
1044	Andrew Singer	Transportation	Policy T-13, break into two sentences so it reads: “When street design changes involve the potential loss of on-street parking spaces, prioritize safety for all transportation modes. Explore mitigation of lost spaces where feasible.”	Y	OK	Policy T-13, break into two sentences so it reads: “When street design changes involve the potential loss of on-street parking spaces, prioritize safety for all transportation modes. Explore mitigation of lost spaces where feasible.”		
1045	Andrew Singer	Transportation	Policy T-13, you say: “...freight transportation improvements in and near industrial areas of regional economic importance, particularly West Midway, the Great Northern corridor, river industrial areas, and the portion of West Side Flats east of Robert Street, to improve safety and connections to the regional transportation network.” What do you mean by “safety”? Safety for trucks? How about for pedestrians since Midway truck routes like Pierce Butler Avenue is also a bikeway and has numerous important, often unsignalized pedestrian crossings, including at least one for kids going to school. What do you mean by “connections”? Is this referencing a possible “Pierce Butler Extension” in Map T-14?	N	It's mainly about safety for pedestrians and bikes, which is a clear emphasis throughout this chapter. A revision wouldn't change policy and would add clutter and awkward phrasing. "Connections" is more general and not referencing the Pierce Butler extension.	None		
1046	Andrew Singer	Transportation	Policy T-15, add the words “and provide safety to pedestrians, cyclists and other road users.”	Y	OK	Policy T-15: "...support businesses and provide safety to pedestrians, <u>bicyclists</u> and <u>other</u> road users."		

1047	Andrew Singer	Transportation	In general, GOAL 3 lacks any discussion of truck routes, or what priority is going to be given to trucks on the arterial and collector streets that Ramsey County or MnDOT have decided are truck routes and need to be designed with wider lanes, no bump-outs, and slip turns for higher-speed truck turning radii. These streets, like Seventh and Snelling are among the most dangerous for pedestrians and cyclists in our city, and a lot of this has to do with their design. Not only are these streets three and four lanes but they are three and four lanes that are designed for high speeds and larger turning radii. Other than Map T-15, Policy T-35 is the only place in the plan where truck route consolidation/identification is talked about and only in the context of pavement condition. It should also be discussed in the context of how designing for trucks impacts the safety of non-motorized users.	Y	The Street Design Manual provides guidance, but staff agrees it is reactive to existing truck traffic and not proactive about exploring ways to move large truck accommodations away from pedestrians and bikes. The SDM, it should be noted, discourages slip turns.	New Implementation Chapter item in Figure I-2: " <u>Evaluate how and where trucks should be accommodated in street and site design to maintain economic vitality while prioritizing pedestrian and bicyclist safety. Then revise the truck route map, Street Design Manual, City ordinances and other official policies accordingly.</u> "		
1048	Andrew Singer	Transportation	Policy T-25, how will you “anticipate” high pedestrian activity? You should spell this out a little bit. I suggest that combining crash and count data to get ‘crash per crossing’ can give you an idea about latent demand, particularly at unsignalized intersections. When people are repeatedly crossing (and getting hit) in dangerous areas, combined with other factors (like the existence of a school, bus stop, stores or other destinations), it tells you that there is latent demand for better or more numerous crossings on a given street.	N	First of all, this policy will probably be replaced by "Implement the Pedestrian Plan" if that plan gets adopted in ~April as anticipated. Secondly, anticipated high pedestrian activity is meant to cover a variety of situations, including land use change, street geometry changes (e.g. 4-to-3 conversion on Rice), and increased transit provision. This does not need to be called out to have the proper policy coverage.	None		
1049	Andrew Singer	Transportation	More important than Policy T-26, is the lack of safe crossings on many of our city’s arterial and collector streets. We see this on 7th Street, Shepard Road, Snelling, Rice, Dale and numerous other streets that can go over a mile between signalized intersections. Because of low vehicle compliance rates in stopping for pedestrians (based on data from “Stop for Me”), traffic “control” is sometimes more important than “traffic calming”.	N	Ped crossing safety is emphasized by Policies T-1, T-3, T-5, T-9, and most especially T-7.	None		
1050	Andrew Singer	Transportation	With this in mind, you should add a new Policy: “Policy T-23.5, Guarantee signalized or safety-enhanced pedestrian crossings of all three and four lane streets at least every quarter mile, because being able to safely cross city streets is a human right.”	N	This is being considered for inclusion in the Pedestrian Plan, which is the proper place to get into these details. The Comprehensive Plan provides sufficient guidance on pedestrian safety.	None		
1051	Andrew Singer	Transportation	Policy T-29, point #3, add “snow-removal” ...or a “Consider public-private partnerships for snow removal on bike lanes and sidewalks”. Because the city is unable or unwilling to do the job, perhaps some of the Universities, churches or major companies could sponsor snow removal along certain stretches of sidewalk or bike lanes.	N	Snow removal details are too specific for the Comprehensive Plan. The draft Pedestrian Plan deals with snow removal in more detail.	None		

1052	Andrew Singer	Transportation	In general, you need a policy statement about snow removal— that the city will spend more time studying the “best practices” (in equipment and techniques) from other cities and commit to keeping at least some of its major bikeways free of snow and ice during the winter. Policy T-34 is the only place I see snow mentioned and just for alleys.	N	Snow removal details are too specific for the Comprehensive Plan. The draft Pedestrian Plan deals with snow removal in more detail.	None		
1053	Andrew Singer	Transportation	Policy T-37, see comment above about “GOAL 3” and trucks.	N	Comment acknowledged	None.		
1054	Andrew Singer	Transportation	Policy T-41, add “...without increasing its costs.”	N	There may or may not be City costs. The City cannot yet be bound by this. Following our land use and transportation priorities is the more important part of this policy.	None		
1055	Andrew Singer	Transportation	Policy T-41, add “...unless designing for automated vehicles significantly increases city costs.” Many automated vehicles currently require signage, signals and other infrastructure that electronically communicates with the vehicles. Implementing some of these technologies would greatly increase infrastructure costs for the city at a time when it is unable to maintain its existing infrastructure. There is a lot of evidence that widespread use of driverless vehicles is a lot farther away than the auto industry would have us believe. The city should avoid spending extra money on it until it’s proven and in widespread use around the rest of the country.	N	"Significantly" doesn't provide much guidance, but, in any case, there may or may not be city costs. The City cannot yet be bound by this. Following our land use and transportation priorities is the more important part of this policy.	None		
1056	Andrew Singer	Transportation	Map T-13 “Forecasted 2040 Average Daily Traffic (ADT)” has not yet been included with the plan but the methodology by which this forecast is conducted needs to be included. I realize the city is getting this data from the MET Council but it needs to request the data’s methodology because past forecasts have been grossly inaccurate and failed to take energy costs into account. The 2008 Comprehensive Plan’s ADT map predicted major traffic growth on Saint Paul city streets that never came to pass. These projections were often used as justifications for widening intersections or refusing to do 4-to-3-lane or 5-to-4-lane safety conversions of streets that were well within federal guidelines for such conversions.	N	Met Council will control what Map T-13 looks like. With no policies pointing to this required map, but several others supporting reducing the # of lanes for safety reasons, the concerns about Map T-13 justifying lane additions going forward are unfounded. Adding info on the Met Council's methodology would not change the policy impact.	None		

1057	Andrew Singer	Transportation	<p>Maps T-14 and T-16: I am totally opposed to the “Ayd Mill Road Redevelopment Project” mentioned in Map T-14 “Future Right of Way Needs” and in Appendix B. No where in the plan is this project spelled out. This road was unilaterally and illegally connected at the south end by former mayor Randy Kelly, over community opposition and without a supplemental Environmental Impact Statement. To include it in a city comprehensive plan without proper public review is illegal and contrary to the notion of “public planning.” Mayor Norm Coleman’s task force on Ayd Mill Road chose a “Linear Park” option as did the Lexington-Hamline and Snelling-Hamline Community Councils. The Merriam Park Community Council selected “No Build”. Yet, since 1960, your agency and the city’s elected officials keep trying to ram through an Ayd Mill highway connection from I-35 to I-94 over public opposition. It’s much the same thing with the Pierce Butler and Kittson Extensions (referenced in Map T-14 and T-16). While other cities are tearing down urban freeways, redeveloping the land, and making money by doing so, Saint Paul is proposing to build new highways. It’s byzantine, automobile-addicted thinking of the highest order. How can the Transportation Chapter of this plan state that it prioritizes maintenance, pedestrians and all its other lofty goals when it is planning more roadways that will further divide and segment our communities, increase maintenance costs and Vehicle Miles Traveled, and remove valuable land from possible residential, retail or industrial development?</p>	Y	<p>The map shows future ROW - it does not dictate design, which could be a bike/pedestrian way as suggested. Design will be done through future study. Some language change is appropriate to ensure clarity.</p>	<p>Change title of Map T-14 to "<u>Potential Future Right-of-Way Connections.</u>" Change labels to "<u>Ayd Mill Corridor,</u>" "<u>Kittson Corridor,</u>" and "<u>Pierce Butler Corridor.</u>"</p>		
1058	Peter Berglund	Transportation	<p>In support of 2040 Comp Plan Transportation Goal No. 4 to shift away from single-occupant vehicles: (Limit parking and you limit cars) If new development brings more housing but doesn't limit the number of new cars, we're going to have more serious traffic congestion. As I understand the city's policies, a new apartment building must provide a minimum of off-street parking spaces. While increased density is good for mass transit, if more density brings more cars, the buses won't be able to function on streets choked with cars. Some say put the new multifamily housing at major intersections to better connect with transit. However, new apartment buildings may result in the same number of cars regardless of their location.</p>	Y	<p>It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.</p>	<p>Edit Policy LU-13: Change "minimums" to "overall." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u></p>		
1059	Peter Berglund	Transportation	<p>My proposal is to eliminate the city's minimum off-street parking requirement for new multifamily housing and replace it with a maximum off-street parking requirement. Residents living in the new multifamily housing would not get permits to park on the street, if there would be only a limited number of permits issued. Existing area residents would be granted parking permits. Permit parking program costs could be paid for with fines for violators. And if the city is making so much more in property taxes, this would help offset the administration of a permit parking program. If developers know the rules and constraints prior to developing, they can choose to undertake a project or not. Future residents would need to know the parking limitations before move in.</p>	N	<p>The policy nexus between the commenter's ideas is not clear. Policy T-17 ("Use pricing to manage parking demand...") already supports charging market rates for permit parking in areas with high demand.</p>	<p>None</p>		

1060	Peter Berglund	Transportation	Senior citizens, college students and many young adults are happy to live without cars, so there should be a market for such housing. We've been told at a meeting on the Ford site that it can cost \$10,000 or more for each parking stall within a multifamily apartment building. If the developers can reduce the number of parking stalls, these savings could be passed on to the new tenants.	Y	Comment acknowledged	Edit Policy LU-13: Change "minimums" to " <u>overall</u> ." Add City-wide Policy LU-XX. <u>Reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes.</u>		
1061	Payne-Phalen Community Council	Transportation	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 Metro Transit. 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.	Y	Equity is a priority per Policy T-1. Could also update the future transit map to add more transitways with equity benefits, including red arrows on Maryland in D5 and on E 7th Street just south of D5.	Revise Map T-8 Planned/Potential Transitways: o The Marshall/Selby proposed transitway red arrow should not go up to University. It should be an arrow from Marshall/Snelling to downtown (or vice versa), that reads as an extension of the planned transitway on Lake/Marshall. o Extend Red Rock’s red arrow south along 61 to City border. o Add an east-west red arrow on Maryland Ave between Como/Phalen. o Add a north-south red arrow on White Bear Ave between I-94 and Larpenteur. o Add a red arrow on E 7th.between downtown and Arcade. o Add an east-west red arrow on Randolph between W 7th and Snelling.		

1062	Payne-Phalen Community Council	Transportation	<p>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.</p>	N	Comment acknowledged	None		
1063	Payne-Phalen Community Council	Transportation	<p>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.</p>	N	Policy T-27 calls for improving quality transit in all parts of the city through strategic establishment of transit-supportive land use intensity. Policy T-1 calls for prioritizing equity in project selection. No need to create a formula involving transit dependency - existing policies get you to the same place. Per other comments, will consider revisions to Map T-8 to better serve transit dependent areas with improved transit.	None		
1064	Payne-Phalen Community Council	Transportation	<p>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.</p>	N	Comment acknowledged.	None		

1065	Payne-Phalen Community Council	Transportation	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.	Y	General concept of this comment has been fleshed out by an inter-departmental work team focused on Arterial BRT, but encompassing all potential transitway improvements.	Revise Map T-8 so that: 1. The Marshall/Selby proposed transitway red arrow should not go up to University. It should be an arrow from Marshall/Snelling to downtown (or vice-versa) that reads as an extension of the planned transitway on Lake/Marshall. 2. Extend Red Rock's red arrow south along 61 to city border. 3. Add an east-west red arrow on Maryland between Como/Phalen. 4. Add a north-south red arrow on White Bear between I-94 and Larpenteur. 5. Add a red arrow on E 7th between downtown and Arcade. 6. Add an east-west red arrow on Randolph between W 7th and Snelling.		
1066	Payne-Phalen Community Council	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.	N	Comment acknowledged	None		
1067	Payne-Phalen Community Council	Transportation	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).	N	We have tried to call out the crossover between Land Use and Transportation issues in those chapters. A chapter on cross-policy goals would confuse more than elucidate, and would not improve implementation.	None		
1068	Payne-Phalen Community Council	Transportation	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.	N	Per above comments, staff recommends considering delivery's impact on curb space through a revised Policy T-42. Also agreed that freight traffic needs more attention, via new Implementation Chapter item calling for a separate new evaluation of large vehicles, with potential updates to the truck route map and Street Design Manual. Both suggested revisions shown above in response to similar comments.	None		

1069	Payne-Phalen Community Council	Transportation	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.	N	The goal's intention on "priorities" is spelled out in its underlying policies.	None		
1070	Payne-Phalen Community Council	Transportation	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.	N	Employment density to support transportation investments is assumed under several policies in the Land Use chapter.	None		
1071	Payne-Phalen Community Council	Transportation	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).	Y	We currently mention downtown in a "such as" clause. Business/industrial parks could easily be added to the "such as" statement, as could 3M and U of M. No meaning is lost by deleting "downtown," and this change avoids loading up a very word-dense policy with even more words. This change - removing the downtown emphasis - is also appropriate given E Metro Strong's study that suggests that a less radial/spoke transit system may be the future.	Revise Policy T-1: "...connection of residents to job centers such as downtown . Priorities will..."		
1072	Payne-Phalen Community Council	Transportation	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.	N	Snow removal details are too specific for the Comprehensive Plan. The draft Pedestrian Plan deals with snow removal in more detail.	None		
1073	Payne-Phalen Community Council	Transportation	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.	N	Policy T-7 calls for implementing intersection safety improvements such as these.	None		
1074	Payne-Phalen Community Council	Transportation	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."	N	See other responses re Map T-8.	None		

1075	Payne-Phalen Community Council	Transportation	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:	N	Comment acknowledged.	None		
1076	Payne-Phalen Community Council	Transportation	a. 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!	N	The Introduction maps include all these maps, and show that ACP50 is a good stand-in for them. Adding these layers to Map T-5 would unnecessarily clutter an already busy map.	None		
1077	Payne-Phalen Community Council	Transportation	b. 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!	Y	OK	Change colors on Map T-5 for legibility.		
1078	Payne-Phalen Community Council	Transportation	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.	N	Policy T-7 already calls for this.	None		
1079	Carol Kist	Transportation	Regarding walkability, sidewalks should be shoveled in the winter.	N	Snow removal details are too specific for the Comprehensive Plan. The draft Pedestrian Plan deals with snow removal in more detail.	None		
1080	Carol Kist	Transportation	Cleveland and Cretin should be one-way streets from Marshall to Ford Parkway. With the Ford site being redeveloped it might make it easier to cross the streets when cars are only going one-way North and South as opposed to the rush of cars going both ways.	N	The Transportation Chapter prioritizes pedestrian safety and calls for crossing improvements. No need to call out specific streets.	None		
1081	Pat Thompson	Transportation	Increasing density of all uses to create walkability and make transit realistic for many more people, including bus shelter.	N	Comment acknowledged.	None		

1082	Michael Russell	Transportation	Quality of life affects equity, community it needs to be truly walkable.	N	Comment acknowledged.	None		
1083	Bill Dermody	Transportation	Delete sidebar on p56. Re-use photo if possible.	Y	Recent research, released by some of the same original researchers, reverses the previous understanding that millennials lack cars more than previous generations. A correction or deletion is required. This takes the main punch out of the sidebar.	Delete sidebar on p56. Re-use photo if possible.		
1084	Bill Dermody	Transportation	Update ped crash data for p55 sidebar.	Y	Hopefully, 2018 data will be available soon (only available to Oct 2018). 2017 is still an improvement over the 2016 data currently there.	Revise sidebar on p55: "...In Saint Paul in 2016 <u>2017</u> , there were 314 <u>305</u> vehicular crashes involving pedestrians and bicyclists alone, including 4 <u>5</u> fatalities and 242 <u>240</u> injuries (163 <u>161</u> requiring hospital attention).		
1085	Bill Dermody	Transportation	There are two policies labeled T-34.	Y		Renumber Transportation policies to avoid repetitions.	58	
1086	Bill Dermody	Transportation	Staff realized that the Kittson line is too long on Map T-14.	Y	It was a carryover from the 2030 Comp Plan, which was completed prior to the 52/I-94 interchange project that clarified the likely Kittson scope.	Revise Map T-14 so that the Kittson Corridor extends only from E 7th Street to Lafayette.		
1087	Bill Dermody	Transportation	Staff realized that the Street Design Manual refers to the truck routes map in the Comp Plan, which is not in the current draft.	Y	The map should be included to allow continued utility of the SDM for truck design. Adding to the Comp Plan is considerably easier than creating a workaround within the SDM.	Add latest truck routes from Public Works to Map T-15. See Figure T-1 from 2030 Comp Plan for potential formatting.		
1088	Bill Dermody	Transportation	Staff recognized that Map T-14 (Future ROW) has no bike/pedestrian/transit priorities. This somewhat ties into comments above about how Ayd Mill extension should not have cars.	Y	The various transitways' ROW acquisitions are looking to be minor - no new corridor is being created. Also, there are various minor bike/pedestrian connections needed that clearly are not equivalent to the road version of "arterials." These connections are more appropriate for area plans and modal plans. However, the one bike/transit ROW that could be considered to rise to the Comp Plan level is the Ford Spur.	Add Ford Spur to Map T-14.		

1089	Bill Dermody	Transportation	As Map P-3 was being updated based on public comment, it became apparent to staff that parallel updates would be needed to Map T-4.	Y	Map T-4 should be the RBTN map, and Map P-3 should be the Trails map. There will be significant overlap in geography, but with two different subjects and purposes.	For Map T-4: - Please change the label “Proposed Regional Trail Search Corridor” to “ <u>Proposed Regional Bicycle Transportation Network (RBTN) Search Corridor</u> ”, and change its symbol from hatched red to hatched blue. - Add the trail corridor Mike requested for P-3 to this map, but as a “Proposed Regional Bicycle Transportation Network (RBTN) Search Corridor”, giving Map T-4 a total of two such corridors.		
1090	District 1 Land Use Committee	Water	Add a new Industrial policy that reads “require future uses of riverfront industrial parcels be those where access to and use of a surface water feature is an integral part of normal business operations.”	N	Policy CA-21 in the draft Mississippi River Corridor Critical Area chapter limits commercial and industrial uses along the river to those having an economic or operational need for a river location, provided that they do not: 1) have a significant adverse impact on water or air quality in the river corridor; or 2) substantially impair the visual character of the corridor from adjacent neighborhoods or the river itself.	None		
1091	Tom Dimond	Water	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 mitigate in Saint Paul. Wetland lost in the National Park should be replaced in the National Park.	Y	Staff have discussed this idea previously. However, there are practical difficulties to replacing wetlands in Saint Paul, namely a lack of suitable locations and publicly-owned land where wetlands can be recreated.	Add a short-term item to the Implementation Chapter: <u>Conduct a study to explore the feasibility of a "no net loss" of wetlands policy.</u>		
1092	Nancy O'Brien Wagner	Water	Where is the reference to protecting the natural assets of parks? The water resources? The animals and wildlife?	N	Policies and operational directives for protecting water quality are found in the Local Surface Water Management Plan (LSWMP), which is an appendix to the Water Resources Chapter. The other things mentioned in this comment are not germane to the WR Chapter.	None.		

1093	Nancy O'Brien Wagner	Water	Where improve public knowledge and awareness of water quality issues and best management practices?	N	There is already policy language in the WR Chapter addressing the topics cited in the comment. The Local Surface Water Management Plan (LSWMP) also addresses these topics.	None		
1094	Nancy O'Brien Wagner	Water	Where improve access to and protection of natural bodies of water?	N	Water body protection is already addressed in LWSMP and WR Chapter. Water access is a Parks and Recreation issue.	None		
1095	David Sullivan- Nightengale	Water	Water resource management (starting on page 179) must include enforcement of existing ordinances for homeowners and businesses exceeding allowable impermeable surface construction. The city has not taken appropriate action to mitigate runoff in several neighborhoods. As a result of this, several houses have flooded and continue to experience flooding.	N	Saint Paul does not currently regulate amount of impervious surfaces directly. Where new construction exceeds 10,000 square feet, post-construction site conditions must comply with SPLC Ch. 52 requirements for site discharge rates. City staff are currently evaluating criteria for determining allowed site discharge rates. Localized flooding problems should be reported to the Department of Safety and Inspections.	None.		
1096	David Sullivan- Nightengale	Water	Only one reference to response to disasters on page 31. Where's the rest?	N	It is assumed the comment refers to a lack of policies addressing disaster response in other chapters of the Comprehensive Plan. Disaster response is an important governmental function, but is generally not part of the long-term, physical planning that is the core function of a Comprehensive Plan. However, due to the unique importance of a safe, reliable water supply and distribution system and requirements for water supply planning, discussion of disaster response readiness in regard to the domestic water supply was included in the 2040 Saint Paul Comprehensive Plan.	None		

1097	Center for Economic Inclusion	Water	Policy WR-9 provides a positive example of this approach: “Apply an equity lens to policy and funding decisions relating to providing assistance to or coordinating with owners to improve private water connections to the public distribution system.” This policy effectively states how an equity lens will be applied to an aspect of water resources. Other areas of the plan, most notably the housing chapter, also provide a high level of detail about how the policies will foster equity. The Center encourages the City to include a similar level of specificity on how an equity lens will be applied to other areas of economic inclusion.	N	Comment acknowledged.	None.		
1098	Center for Economic Inclusion	Water	Saint Paul for All includes several commitments to use an equity lens in decision-making and evaluation, including: • “Apply an equity lens to policy and funding decisions relating to providing assistance to or coordinating with owners to improve private water connections to the public distribution system” (WR-9).	N	Comment acknowledged.	None		
1099	Tom Dimond	Water	Wherever you go in Saint Paul we should feel safe including clean air, clean water, clean soil, and safe hiking and biking paths.	N	Comment acknowledged.	None		
1100	Tom Dimond	Water	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.	N	Comment noted.	None		
1101	Tom Dimond	Water	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.	N	Comment noted.	None		
1102	Saint Anthony Park Community Council (SAP)	Water	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.	N	Policies of the WR Chapter support rainwater infiltration where appropriate.	None		
1103	Saint Anthony Park Community Council (SAP)	Water	Minimum Impact Design Standards should be required, wherever possible, rather than simply encouraged, as stated in Policy WR-18.	N	MIDS provide a good framework for site design. However, MIDS may not always be feasible for small, intensely-developed urban sites.	None		

1104	Saint Anthony Park Community Council (SAP)	Water	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).	N	Proposed WR Chapter policies encourage rainwater gardens and other BMPs. These policies will guide stormwater management decisions regarding City-controlled property. The City has and will continue to encourage use of stormwater BMPs where appropriate and where City affordable housing funding is used.	None		
1105	Saint Anthony Park Community Council (SAP)	Water	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 City of Saint Paul’s 2017 Stormwater Permit Annual Report. 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.	Y	Policy WR-8 addresses groundwater supply. However, groundwater quality is also an important issue, and in the context of the comment is related to brownfield issues. Re-establishment of the City's Brownfields Working Group should be an identified action item in the Implementation Chapter.	Add a short-term item to Figure I-5: <u>Re-establish the City's inter-departmental Brownfields Working Group.</u>		
1106	Saint Anthony Park Community Council (SAP)	Water	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.	N	This comment will be shared with the Saint Paul Water Resources Working Group. The Comprehensive Plan is not the appropriate document for addressing policy at the level suggested. However, identifying priority areas for reduced use of road chemicals, to the extent it is not addressed in the City's Local Surface Water Management Plan, should be considered for the Implementation Chapter.	None		
1107	Saint Anthony Park Community Council (SAP)	Water	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.	N	Educational efforts are already part of the City's activities pursuant to the City's MS4 stormwater permit.	None.		

1108	Saint Anthony Park Community Council (SAP)	Water	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”.	Y	Comment acknowledged.	Change "plans" to "plants."		
1109	Saint Anthony Park Community Council (SAP)	Water	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?	N	The other water-related plans adopted by the City have more detail on implementation.	None		
1110	Kathy Sidles	Water	3. All parts of the metro area can have a protected neighborhood corridor. Give Rail Roads, highway right of ways, buried stream and waste water green spaces names, protect them, pick up the trash and enhance them.	N	Comment acknowledged	None		
1111	Payne-Phalen Community Council	Water	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.	N	Comment acknowledged.	None		
1112	Payne-Phalen Community Council	Water	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.	N	The City of Saint Paul coordinates and prioritizes work on water resources through the Water Resources Working Group. City staff meet monthly, with partner agency (WMAs and WDs) joining every other month.	None		

1113	Payne-Phalen Community Council	Water	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).	Y	OK	Add a new Policy WR-XX under Goal 3: <u>Apply and equity lens to policy and funding decisions relating to surface water quality.</u>		
1114	Payne-Phalen Community Council	Water	b. In addition, we also support looking at equity within the public drinking water system, as you have mentioned.	N	Comment acknowledged	None		
1115	Payne-Phalen Community Council	Water	42. Page 180: Spelling out the goal of integration in Goal 1: Integrated Water management is a great idea! Thank you!	N	Thanks!	None		
1116	Payne-Phalen Community Council	Water	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.	N	City staff have worked to promote more sophisticated approaches to stormwater management in areas where smaller lots and goals for efficient land use present challenges to meeting permitting requirements and water quality goals, such as in transit corridors. The City's use of green infrastructure is intended to support, not work against, efficient land use. In fact, shared stormwater systems may allow higher densities on contributing parcels, since stormwater does not have to be accommodated on each individual parcel.	None		
1117	Payne-Phalen Community Council	Water	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.	N	Comment acknowledged, and is understood to emphasize the importance of efficient land use along commercial corridors.	None		
1118	Payne-Phalen Community Council	Water	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.	N	The policy encouraging the use of MIDS was specifically written with the understanding the MIDS are not always feasible, or even desirable, in an urban environment where efficient land use is paramount.	None		

1119	Payne-Phalen Community Council	Water	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 a 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.	Y	WR-12 refers to system maintenance and upgrade priorities already identified by Saint Paul Regional Water Services. It is not clear what value such a map would bring. In regard to WR-16, the suggested map could be useful in identifying and tracking needs.	Include a map of known surface water impairments (303(d)/305(b)) in Saint Paul in the WR Chapter.		
1120	Payne-Phalen Community Council	Water	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.	N	Comment acknowledged. The comment will be brought to the Saint Paul Water Resources Working Group.	None		
1121	Payne-Phalen Community Council	Water	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.	Y	Agree.	Move sidebar from p. 183 to p. 181.		
1122	Payne-Phalen Community Council	Water	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?	N	Saint Paul, with a few limited exceptions, has more than adequate gray stormwater conveyance infrastructure. The focus of the sewer utility is on maintaining this infrastructure.	None		
1123	Payne-Phalen Community Council	Water	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?	N	The Metropolitan Council is responsible for maintenance of regional sewer interceptors. Please contact your Metropolitan Council representative.	None		

1124	Payne-Phalen Community Council	Water	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).	N	This is too specific of an issue for a high-level policy document.	None		
1125	Payne-Phalen Community Council	Water	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.	N	Such a map would be useful, but a defined list of potential future projects does not exist. This comment will be brought to the Saint Paul Water Resources Working Group.	None		
1126	Payne-Phalen Community Council	Water	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:	N	Map WR-2 is included to meet Metropolitan Council requirements. It is not expected to provide value to most plan users. The defined areas are sanitary sewer service areas, with each area being served by a common Saint Paul trunk sanitary sewer. The maps does not reflect age or condition of infrastructure.	None		
1127	Payne-Phalen Community Council	Water	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?	N	Map WR-2 is included to meet Metropolitan Council requirements. It is not expected to provide value to most plan users. The defined areas are sanitary sewer service areas, with each area being served by a common Saint Paul trunk sanitary sewer. The maps does not reflect age or condition of infrastructure.	None		

1128	Payne-Phalen Community Council	Water	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?	N	Map WR-2 is included to meet Metropolitan Council requirements. It is not expected to provide value to most plan users. The defined areas are sanitary sewer service areas, with each area being served by a common Saint Paul trunk sanitary sewer. The maps does not reflect age or condition of infrastructure.	None		
1129	Payne-Phalen Community Council	Water	Clearly a lot of the specificity in this map [Map WR-2] 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.	N	Comment acknowledged.	None		
1130	Payne-Phalen Community Council	Water	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?	Y	The map will be amended for greater clarity.	Revise Map WR-3.		
1131	Payne-Phalen Community Council	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.	Y	OK	Add text to p. 190 that provides more information on the content of the Local Surface Water Management Plan.		
1132	Payne-Phalen Community Council	Water	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 sin 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.	N	This comment will be shared with the Sewer Utility and Water Resources Working Group.	None		

1133	Payne-Phalen Community Council	Water	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	N	Comment acknowledged.	None		
------	--------------------------------------	-------	--	---	-----------------------	------	--	--