



UNION PARK DISTRICT COUNCIL

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An Affirmative Action, Equal Opportunity Employer

January 7th, 2019

Fay Simer
1400 City Hall Annex,
25 West Fourth St.,
St. Paul, MN 55102

Dear Ms. Simer,

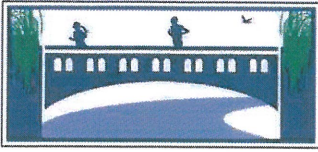
At its January 2nd, 2019 meeting the **full Union Park District Council voted in favor of supporting the draft St. Paul Pedestrian Plan**, but requests that the plan discuss

- 1) the importance of zoning to pedestrian safety/access (driveway and building placement, wheel stops for cars in parking lots, etc.), and
- 2) the importance of vegetation including trees to pedestrian comfort and appeal.

Please let me know if you have any questions.

Sincerely,

Brandon Long, Executive Director
Union Park District Council



Payne-Phalen

COMMUNITY COUNCIL

567 Payne Avenue, St. Paul MN 55130 www.paynephalen.org 651-774-5234 district5@paynephalen.org

February 8, 2019

VIA EMAIL

City of Saint Paul City Planning Commission
c/o Fay Simer
25 West 4th Street, 1400 CHA
St. Paul, MN 55102

RE: St. Paul Pedestrian Plan, draft dated November 11, 2018

Dear Commissioners:

On behalf of the Payne-Phalen Community Council (District 5), I am writing to provide review and comment from our organization on the *Saint Paul Pedestrian Plan*, draft dated November 11, 2018. We are appreciative that the City took on this important work and we are very encouraged by the level of thinking and the amount of hard work and engagement that has been folded into the project along the way. We are also glad to see a document that tackles pedestrian issues on a citywide basis; doing so seems like exactly the right approach for ensuring that investments are prioritized appropriately as-needed.

Our comments are divided into two sections. First, we offer comments on specific items as mentioned in the document, page by page. After that, we offer more general comments about the document as a whole.

Specific comments:

1. Page 4: We agree with the three goals at the outset of the plan. They make sense and start off on the right foot, so to speak.
 - a. For the second goal, “connect vibrant communities...” we encourage you to consider that while a strong pedestrian circulation system connects vibrant communities, it is also critical for strengthening communities that are not yet so vibrant or may have lost some of their vibrancy over the last forty or fifty years of the automobile era. In other words, a well-designed pedestrian system is very much a part of bringing forth revitalization of places that exist now as well as those places that are envisioned in the city’s future but are not yet developed or built. It’s a small language change, but the nuance is important, particularly for commercial corridors and nodes that might need attention.
 - b. For the third goal, “Get it done...” we applaud the intention and strong purpose in this statement. Please consider adding St. Paul’s Community Councils to the list in the statement about parties for coordinating activities.

2. Page 5: The map of “High-Priority Areas for Pedestrian Investment” is very strong and to the point. We appreciate the straightforward intention of this map and we agree with the three priorities stated: Equity, safety, connectivity. With that in mind, we have several suggestions for further consideration:
 - a. For the first priority, Equity, the intention is to make investments in neighborhoods that rely on walking the most. This is great. Please also consider that relying on walking often means making easy connections between home and work. With that in mind, we suggest that the high-priority area (green) should be enlarged to include all of the Phalen Corridor east of Arcade Street and north to the intersection of Maryland Avenue and Johnson Parkway. This corridor is now and will continue to be the location of many jobs – jobs that in an ideal world would be much more easily accessible to local residents. Though the street grid in this stretch of Phalen is interrupted, that need not mean that the pedestrian circulation system is also disconnected. Presently there are very few pedestrian connections (sidewalk extension, trails, etc.) that connect the residents living in neighborhoods on either side of Phalen to the jobs in the corridor.
 - b. This same concern along Phalen Boulevard is captured by the other two priorities as well: Safety and connectivity. In all, we find it problematic that the businesses along Phalen are really only accessible by car (and they all have large surface parking lots). If the pedestrian grid was stronger here, these businesses – and the employment opportunities they offer - could be much more accessible to residents of nearby neighborhoods – residents who might be able to forego the expense of owning and operating a car because they can safely and conveniently walk to work.
3. Page 7, Table 1: Please consider including language that indicates the need for, and benefits of coordinating with St. Paul’s Community Councils on the various design and development efforts in this list. For the Payne-Phalen Community Council, we would very much like to collaborate with the City as improvements are being contemplated, designed, and implemented.
 - a. For instance, how do these activities fit into the City’s new Capital Budget process?
 - b. Also, it would be good to know more specifically how District Councils can be helpful by ensuring strong engagement advice and consultation on this list of actions?
4. Page 9: The broad definition of “walking” that is included here is great. Thank you!
5. Page 11: In regard to the section on “Equity in Prioritization...” please keep in mind that the City’s draft Comprehensive Plan includes a series of maps, all of which include the designation of Areas of Concentrated Poverty (ACP). As an analytical framework, this is quite useful in sorting out where future investment should be made on all matter of projects in order to forge equitable spending across the city. The “high-priority areas for investment” map in this document need not have the same boundary. We understand that there are considerations and benchmarks for the priorities in this plan that are slightly different. That said, because the intentions are generally the same across both plans and because this document is intended as

an appendix to the City's Comprehensive Plan, the maps in this plan should also indicate the ACP designation.

6. Page 11: In regard to "engagement practices," please consider adding language that indicates how St. Paul's Community Councils can be helpful and included.
7. Page 20 and 21: The graphs depicting survey responses indicate percentages, but they do not add up to 100. Does that matter? It seems a bit confusing.
8. Page 24, Table 2 and Page 25, Figure 4: This table, the accompanying map, and the analytical sorting represented are great! It's a perfect example of combining data analysis with community considerations. Generally speaking, it makes a lot of sense. There are a couple of places we hope you will consider for inclusion:
 - a. Please consider adding the eastern portion of Phalen Boulevard, see comments 2a and 2b, above. There's very likely no coincidence that participants in the engagement process *did not* identify this area precisely because it is a part of the city that currently has few if any pedestrians – particularly those that are walking *between* the jobs in the corridor and residences in the adjacent neighborhoods (as opposed to recreational users *moving along the length* of the trail from one end to the other).
 - b. The apartment district in the NW corner of District 5 between Arlington and Larpenteur, I-35E and the Gateway Trail has several sidewalk gaps, and, in several places, there is a disconnect between the trail and city sidewalks.
 - c. Along East 7th Street, between Downtown and Metro State, there is ample possibilities for new transit-oriented development (TOD) that connects the fabric of three or four existing neighborhoods. Ensuring well-connected pedestrian infrastructure along and across this spine will be critical. Currently, only one side of the street is indicated as a priority area.
9. Page 27-35: The section on crossing busy streets and crossing treatments is great! It's really nice to see this level of detail in thinking about the pedestrian experience. It's particularly useful that its written from the point of view of the pedestrian (as opposed to designers and engineers). Thank you! With that in mind though, we have a couple of suggestions and questions: Keeping in mind the goals and priorities of the plan, we strongly encourage the City of St. Paul to ensure that the plan and implementation of the plan include and incorporate all County State Aid Highways (CSAH) and MnDot Highways as well as all city streets. The vast majority of pedestrians have no knowledge of or concern with what entity of government controls the design and maintenance of various routes through the city. (Nor should they need to worry about such things). For pedestrians, they are all streets and roads and the necessity for equity, safety and connectivity are critical throughout.
 - a. Table 5, Action 1-1 would seem to allude to this, but given the complexity and logistics of intergovernmental coordination, this statement reads a bit weak.
 - b. For example, for District 5 we hope that the City is as committed to strong pedestrian infrastructure along Arcade Street (MN 61) and along the length of East Maryland Avenue (CSAH) as it is on Payne Avenue.

- c. For the purposes of transparency and community education, it would be helpful if the plan document included a map to indicate where intergovernmental jurisdictions meet within the everyday experience of St. Paulites walking around their city; which streets are governed by which jurisdiction. Case in point, in a recent public meeting Ramsey County held on the reconstruction of Maryland Avenue (between Arkwright and Edgerton Streets), some community members were confused and frustrated that the proposals being shown were inconsistent with the language and proposals of the city's draft pedestrian plan.
 - d. Likewise, we suggest adding Ramsey County and MnDOT to the list entities that will need to be coordinated in order to ensure that these goals and priorities are met when implementing the plan.
 - e. For the real-world experience, it would be very helpful to know that the City is committed to ensuring seamless pedestrian infrastructure across all manner of city streets. For instance, is it reasonable to expect that such things as crossing treatments, signal timing, and the like will be consistent across the system? Will Ramsey County Public Works and MnDOT be as open to the need for bump-outs/sidewalk extensions as St. Paul Public Works has been in the last decade or two? Who is responsible for snow removal on County roads and will that be undertaken in a manner that is consistent with the City's intentions for equity, safety, and connectivity along and across county roadways in the winter months?
10. Chapter 6, page 59: Please consider including language that indicates the need for and benefits of coordinating with St. Paul's Community Councils in the process of monitoring progress on the walking network.
11. Maps on Pages 65-71: When viewed as a collection here – all assembled in one place – there are several comments and questions that arise:
- a. It would be helpful if these maps were numbered as they are in the previous parts of the document.
 - b. The NW corner of District 5 indicates a high number of sidewalk gaps (page 68), and this part of the city has a medium to high density of residents, so why wasn't it included as a high-priority area for investment (page 67, 69, 70 and 71)?
 - c. Based on their respective titles, it's not clear what the difference is between the map on page 69 and the one on page 70.
 - d. For the map on page 71, in the so-called "Swede Hollow and Capital Heights" cluster, see our comments about substantive connections and types of ped infrastructure in comments #15, below.
 - e. With regards to the naming of the cluster, we suggest this should be called the "Payne-Phalen, Dayton's Bluff, and Swede Hollow cluster." I think the neighborhood directly north of the capital building is called "Capital Heights" (i.e. in the vicinity of Mt. Airy and Jackson Streets).
 - f. For the map of clusters identified on page 71, is there and anticipated time table for when and in what order each of these will be addressed?
12. For the tables on pages 73-78: The information contained in these tables is very useful and it's great to see it all in one place. That generates a few questions though:

- a. Which one of each of these actions identified in these tables will be correlated to the geographic-based information in the maps on pages 65-71? Is this something that will be sorted out in the final version this document or is that something that District Council should sort out when we update our District Plans?
- b. How does this list get folded into the City's Capital Budget Process?
- c. How should communities and District Councils help in sorting out this list relative to providing community input and feedback about these projects relative to the City's new capital budget process?
- d. Has this list been correlated to the implementation components of the City's draft Comprehensive Plan? If not, it would make a great deal of sense to do that now before either document goes through the final adoption process.

13. For Table 18-23 on pages 85-89: Please consider adding a column that locates each project based on the corresponding name or number of the District Council in which the project lies. This will improve legibility and clarity for neighborhoods across the city.

General comments:

As mentioned earlier, it's great to see a document that tackles pedestrian issues on a citywide basis. Likewise, we applaud the approach to the topic that couples community feedback with a consistent analytical framework that helps to sort out parts of the city most in need. That combination seems like an excellent way to ensure that investments are prioritized and will be in the appropriate places first. That said, there are some ideas or considerations that might not have come up through the engagement process that are still germane to the interests of the walking public. With that in mind, we offer some suggestions for additional items that could be included to strengthen the existing document. We also offer some items that could be included as part of the scoping for future work related to this important topic.

14. Most of the Appendices are focused on filling in sidewalk gaps. This is important because that work is a high-priority. But it's not clear how the priority of safety fits in because there are no appendices associated with that priority. Likewise, the priority of equity is only implicit. We suggest that the highest priority would be given to those clusters identified in this plan that also correspond to the Areas of Concentrated Poverty (ACP) identified in the draft Comprehensive Plan.
15. Not all pedestrian facilities are sidewalks that parallel existing city streets. In many parts of the city there is a need to connect interrupted parts of the grid; places where vehicular connections may not be crucial but where new or improved pedestrian connections are essential for good access by walking.
 - a. For example, in Payne-Phalen, there are ample sidewalks in many of the blocks immediately west of Swede Hollow, but only on or two access points from the street-facing sidewalk system into the park and its train system. Stairs, ramps, and other connective infrastructure should also be included and prioritized in this plan.

- b. Likewise, there is a need for pedestrian bridges that help connect Railroad Island (in lower District 5) with the jobs and services in the Lower Phalen Corridor Business Center. In particular, there is an opportunity to directly connect residents of Railroad Island to the benefits gained through the region's investments in the Rush Line BRT, but there is a need for pedestrian bridges in order to make such connections. The County's Rush Line project office has indicated this is not in their budget. We would like to work with the City to ensure such connectivity to high-volume transit is possible to this neighborhood.
 - c. As mentioned previously, neighborhoods north and south of Phalen Boulevard could and should be re-knit with the boulevard through pedestrian infrastructure – even if vehicular access is limited. On the north side of Phalen, such additions would need to be extensions of sidewalk beyond the extent of existing city streets. On the south side of Phalen, consideration should be given to the possibility of adding one or two pedestrian bridges over the mainline rail trunk.
 - d. Re-knitting the pedestrian grid in this stretch is important for connectivity between job centers and adjacent neighborhoods with relatively high unemployment. In addition, it should be kept in mind that the neighborhoods along the Gateway Trail would benefit from great access between street-facing sidewalks and the elevated trail.
 - e. In all of the cases mentioned above (#15-a-15d), enhancing connectivity is not only a matter of access and convenience, it's a matter of enhancing crime prevention through environmental design (CPTED).
 - f. Within and beyond District 5, there are a series of places around the city where walkers connect from a street-facing sidewalk to a trail in a park or along some other sort of amenity. Such connections should be considered across the city, but especially for those locations noted as clusters for priorities for investment.
16. Keeping in mind the goals and priorities of the plan, we strongly encourage the City of St. Paul to ensure that the plan and implementation of the plan include and incorporate all County State Aid Highways (CSAH) and MnDot Highways as well as all city streets. The vast majority of pedestrians have no knowledge of or concern with what entity of government controls the design and maintenance of various routes through the city. For pedestrians, they are all streets and road and the necessity for equity, safety and connectivity are critical throughout.
- a. In particular, for District 5 we hope that the City is as committed to strong and consistent pedestrian infrastructure along Arcade Street (MN 61) and along the length of East Maryland Avenue (CSAH) as it is on Payne Avenue (a city street).
 - b. For the plan document, it would be helpful to include a map that indicates where intergovernmental jurisdictions meet within the everyday experience of St. Paulites walking around their city.
 - c. Likewise, we suggest adding Ramsey County and MnDOT to the list entities that will need to be coordinated in order to ensure that these goals and priorities are met when implementing the plan (as noted above).
 - d. For the real-world experience, it would be very helpful to know that the city is committed to ensuring seamless pedestrian infrastructure across all manner of city streets. For instance, is it reasonable to expect that such things as signal timing and ped crossing cycles will be consistent across the system? Will Ramsey County Public Works and MnDOT be as

open to the need for bump-outs/sidewalk extensions as St. Paul Public Works has been in the last decade or two? Who is responsible for snow removal on County roads and will that be undertaken in a manner that is consistent with the City's intentions of equity, safety, and connectivity along and across county roadways in the winter months?

17. There is an important consideration that could or should be amplified in this plan – future development. The plan itself is very strong in identifying existing shortfalls in the pedestrian system and recognizing the deficit in existing conditions. But in the course of the next ten or twenty years, a great deal of growth and redevelopment is expected – redevelopment that might help to transform parts of the city that could be so much more than they are today. Unfortunately, this plan doesn't have a strong sense of anticipation of those future needs. More importantly, the plan could be strengthened to anticipate the future benefits of redevelopment around TOD locations as well as intended investments to the transportation infrastructure. How pedestrian circulation is integrated into both public- and private development projects will be critical to ensure that such investments are maximized. The following projects are examples:

- a. The Rush Line Bus Rapid Transit Line and the TOD potential at each of its stations.
- b. The Gold Line Bus Rapid Transit Line and the TOD potential at each of its stations.
- c. Streetcar on West 7th Street – and perhaps one day on East 7th Street too.
- d. Though it's not TOD, MnDot has embarked on a huge, once in a generation project along Interstate 94 between Highway 61 on the East and Highway 55 on the west. This project offers a wonderful opportunity to incorporate pedestrian infrastructure that re-connects neighborhoods on either side of that corridor.

For each and all of these projects, there are enormous opportunities to connect and re-weave the fabric of St. Paul's neighborhoods together through additions to and enhancement of the city's pedestrian system.

18. There is an important feature of how the city's pedestrian system is improved and expanded that is not yet fully covered – the design of the system's component parts. While we recognize that some of this is covered in Chapter 5 (page 32-33), we encourage the City to develop a more robust set of typologies and standards. We understand that this may have been beyond the scope of this particular project but suggest it as a useful next step. Ideally, such typologies would be developed in conjunction with Ramsey County and MnDOT so that there can be consistency for end users across the city. Several examples come to mind:

- a. It would be great to see this work married to street typologies for the various kinds of road environments in and across the city: Residential streets, commercial/retail streets, streets in industrial districts, streets that faces parks, parkways, trails, etc.
- b. Similarly, there are a great number of urban design standards, features and practices that aren't yet considered. Such features are predicated on a strong sidewalk/pedestrian system for their very being as well as the character and amenity they add throughout the city. There are many such design features and component parts that could or should be included. Among the list the following come to mind: Street trees, planted medians, sidewalk cafes, parklets, etc.

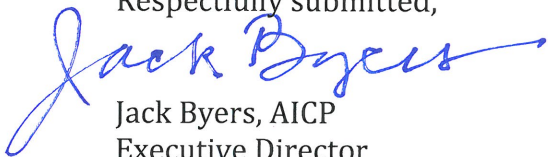
- c. In all, there would be great benefit to sorting out some design standards based on best practices so that each project would not have to “re-invent the wheel” so to speak. Standards could include things such as the benefits of (a) establishing a ‘pedestrian clear path’ on busy commercial streets that fill up with all sorts of street furniture and accessibility features, the conflicting uses of verges and boulevards for location of necessities like utilities as well as amenities such as street trees.
- d. In all, the current strength of this plan would be enhanced dramatically if a catalogue of design components could be established.

19. Finally, in addition to the strong considerations of winter conditions, thanks for including photos of St. Paul sidewalks in the winter. They may not be picture-perfect like photos shot in the summer, but they are a reality in this city for many months of the year. Kudos for acknowledging that important reality in substance and in presentation!

Thank you again for the opportunity to provide feedback on this important project. On behalf of the Payne-Phalen Community Council, we are grateful that the City recognizes these challenges and takes them seriously. We appreciate all of the hard work, effort, and thoughtfulness of the document. As we set about the process of updating our District Plan in the coming year, we will use this document as a springboard for the transportation and circulation chapter.

If you have any questions or require further clarifications, please feel free to contact me.

Respectfully submitted,



Jack Byers, AICP
Executive Director

- cc. Kathy Lantry, Director, St. Paul Public Works
- Fay Simer, Project Manager, St. Paul Public Works
- Luis Pereira, Planning Director, St. Paul Planning and Economic Development Department
- Bill Dermody, Principal Planner, St. Paul Planning and Economic Development Department
- Athena Hollins, President, Payne-Phalen Community Council
- Board Members of the Payne-Phalen Community Council

February 4, 2019

District 1 Community Council's Land Use Committee has put together the following notes, questions or concerns for your review. Overall we are thrilled to see a policy document like this and appreciate future implementation of approved policy decisions. We represent a part of the city that has fewer multi-modal transit options than the rest of the city, and express concerns on a number of safety, accessibility, and equity issues below.

Page-specific comments:

1. Page 4: "Get it done. We will achieve our vision of a walking city by coordinating activities across city departments, pursuing opportunities for low-cost interim solutions and updating this plan every five years." This statement doesn't provide any sense of work that needs to be done and work accomplished. A plan by itself does nothing without implementation and measuring goals and creating timelines.
2. Page 5: District 1 is not considered a "high priority" area for walking investments, likely because of our lack of population density. However, we have a high percentage of people who rely on walking, we have some critically-serious safety issues, as highlighted with the recent death and injury on McKnight just south of Burns, and we have many areas of our district that lack sidewalks.
3. Increased lighting at major intersections with higher density populations, and near bus stops is absolutely needed (note this comment was originally drafted before the crash/death at McKnight south of Burns).
4. We would welcome the opportunity to host more "Stop for Me" events in 2019 in our district.
5. Page 15: I don't think that "Prioritize pedestrian safety in street design" should be first. It might be a general, non-priority list but by listing it first, it seems like it's the most important. We're not saying it isn't, but it's the most challenging to accomplish compared to the other elements, and can **only** be done when a street is being designed/redesigned. Most streets will not be designed or redesigned, so to me that emphasis seems not appropriate..
6. Page 25: Because the lower portion of our district (south of 94) has also low bus connectivity, should the city considering raising the priority level? People don't even have safe ways to cross the street to GET to the bus! (again, this statement was drafted before the crash/death at McKnight south of Burns)
7. We need more safe crossings on McKnight Road and Lower Afton Road. We need reduced speeds on these roads, even though we know they are county roads. They're still residential roads too. School buses and Metro Transit buses travel on these roads, people walk, bike, wheelchair and push strollers along these roads (or sometimes IN the road when no sidewalk is available. Yes, we've seen people use wheelchairs in the street on south McKnight Road.

8. Page 40: There are few sidewalks in some of the south part of our district, and yet it didn't make it on the list of "stand alone" suggested projects.

General comments:

1. Make sure that the south side of Suburban is included in the priority area - it looks like the north side is but the south might not be.
2. We support sidewalks for every part of Saint Paul but we believe we have a higher percentage of streets without sidewalks. The southern side of Suburban should be one of the highest priority sidewalks in the district. The semi-rural and suburban-style developments of the southern part of our district are way under-sidewalked and there's probably push-back from folks complaining about how they feel the right of way is theirs to use. It isn't! A non-car based city must have sidewalks. Some of these areas are 3-6 miles from downtown and yet they're still treated as either second-class parts of the city or like a suburb, even where there are multi-unit dwellings and high residential density.
3. We are concerned about why St. Anthony Park and Highland that are designated high priority areas - based on what, exactly? Those areas already HAVE a lot of amenities are part of the city has never had!
4. We are split but lean slightly toward recommending that the city conduct a study for snow removal by the city, to determine a cost-benefit analysis to see if the effort would be worth the costs. We are concerned about ADA compliance issues. We know that some people who get around in wheelchairs do not leave the house often because of unsafe sidewalk conditions.
5. We think that the "road diet" on Maryland n really helped. We would like to see that on other 4-lane streets in our district, starting with McKnight.
6. We recommend training for pedestrians too. Just like in drivers ed — we learn about defensive driving, because you can't always trust the other driver. That is even more important when it is pedestrian vs car because the pedestrian is almost always the loser. Yes, drivers should always follow the rules and watch for pedestrians but empowering them with safe habits would be good too.
7. We encourage reducing speed limit for autos in standard residential streets from 30mph to 25 mph.
8. We encourage consistent speed limits on the same road. For example, McKnight changes speeds often from south of 94 to Carver several times.
9. We would like to see an increase in stop signs at some residential neighborhoods, Hazel & Old Hudson Road.
10. We would like to see safer crossings throughout all of our district. For example, Ruth and Old Hudson Road, McKnight and Larry Ho and every other major intersection on McKnight that has a bus stop and higher population density.



Thank you for reading and considering these comments. We would be happy to provide additional clarification if you desire.

Regards,

District 1 Community Council

Cc: Councilmember Jane Prince



North End Neighborhood Organization (District 6)
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Saint Paul, MN 55117
651-488-4485
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February 5, 2019

Betsy Reveal
Chair, Saint Paul Planning Commission

Fay Simer, AICP
Pedestrian Safety Advocate
City of Saint Paul | Department of Public Works

The North End Neighborhood Organization (NENO) works to serve, support, and promote our community as an equitable place for everyone to live, work, and play. NENO promotes the North End as an equitable, relevant, influential, and engaged neighborhood by:

- Supporting community equity and engagement.
- Helping the community live and work together to achieve success.
- Proactively supporting a diverse, sustainable, and connected community.
- Publicizing the North End as a safe, economically developing, and welcoming neighborhood.
- Bringing vitality to the North End by improving businesses.
- Marketing the North End as a desirable neighborhood for everyone.

NENO appreciates the work the Saint Paul Pedestrian Plan (SPPP) steering committee and project team performed to develop the draft plan of the SPPP. NENO appreciates the SPPP correctly selecting the North End as an area that needs additional investment in its pedestrian network, having disproportionately more sidewalk gaps (36.6 miles) than other High Priority Areas for Walking (SPPP, page 91). Although the SPPP generally explains Saint Paul's pedestrian system's history, current status, and shortcomings---as well as the authors' selection process of "High Priority Areas for Walking"---the SPPP fails in numerous instances to be transparent and equitable.

In the spirit of collaboration, equity, and transparency, NENO provides the following comments in the hopes that the SPPP's steering committee and project team, Saint Paul Public Works, Saint Paul City Council, and other organizations and government entities will make beneficial changes to the SPPP.

Lack of Consideration for Visually Impaired

Situation: Community members have come forward at NENO meetings to indicate that the

downloadable draft of the SPPP is not ADA compliant, creating accessibility challenges for visually impaired users. Furthermore, the SPPP does not account for visually impaired persons: “People walking should clearly indicate that they would like to cross by making eye contact with approaching drivers and standing at the edge of the roadway” (page 31).

Analysis: This problematic statement indicates that the authors of the SPPP did not consider (1) that visually impaired persons cannot make eye contact with drivers, and (2) that eye contact is not used the same way in many cultures, and (3) that eye contact is an easily misconstrued physical communication method that is entirely inadequate for signaling a need to cross.

Recommendation: NENO requests that the final version of the SPPP is composed and checked for ADA compliance, to include graphics, image metadata, and colors that visually impaired stakeholders can use more easily. NENO also recommends that the SPPP uses the physical act of a pedestrian standing on a corner or crosswalk as the only necessary body language to communicate to drivers that the pedestrian is going to cross the street.

Repeatability Difficult without Open GIS Data

Situation: The SPPP and its accompanying website does not provide the GIS data sets that were used to compile the GIS analysis.

Analysis: Reconstructing the analysis is not possible for outside groups wishing to check the project team’s work. The repeatability of the GIS analysis and availability of the data used in the analysis is necessary for the plan to be considered transparent.

Recommendation: NENO requests that all GIS data sets used to compile the GIS analysis be placed on Saint Paul’s Open Data portal.

Temporary Measures Presupposed as Solutions

Situation: The SPPP skirts the issue of long term maintenance costs, especially in sections with actual dollar amounts displayed. These actual dollar amounts only reflect the initial installation but do not indicate any of the maintenance costs or socio-economic costs over longer periods of time. The current draft of the SPPP proposes no rubric or other criteria and simply presupposes “low-cost interim” products as the optimum solutions.

Analysis: The SPPP misleads readers into thinking that “low-cost interim solutions” are more cost effective than more permanent pedestrian infrastructure. Rather than “low-cost interim solutions,” the SPPP should pursue opportunities based on the most efficient, effective, and sustainable solutions over the life of the infrastructure installed. All solutions should be considered in terms of socio-economic return-on-investment (e.g., lives and property saved, property values increased, fewer accidents, fewer police and emergency responses) and cost-benefit to the public, which is not clear with the current language.

Recommendation: NENO recommends developing socio-economic return-on-investment and cost-

benefit measures to better select pedestrian solutions. NENO also recommends that all short and long term costs, including maintenance, for pedestrian solutions are listed in a clear and easily comparable format.

Purposefully Opaque Language

Situation: Although the SPPP shows some transparency in the lengthy descriptions of the development of the High Priority Areas for Walking Investments, the SPPP fails to explain in any significant detail how the “constructability” of projects were determined, devoting only a few sentences in the last appendix (Appendix D):

“The constructability rating was assigned by Saint Paul Public Works staff based on general estimates of existing conditions such as right-of-way availability and current conditions within the right-of-way like slopes, trees, railways and utility structures that impact construction costs. Constructability ratings range from 1 to 5, with gaps rated 1 as the easiest to construct and gaps rated 5 as having the most design constraints.” (SPPP, page 84)

The SPPP continues to place the North End’s pedestrian network as a lower priority to other areas because of an opaque “constructability” determination by nameless “city staff.”

Analysis: By burying this “rating” in the furthest appendix and using two sentences to describe the process, the authors of the SPPP have effectively hidden their plans behind the seemingly transparent public outreach and analysis. More disturbing is that this “rating” is buried in in the last appendix within the SPPP and was not presented to the NENO Board or North End residents during the City’s public presentation during the November NENO board meeting.

The “constructability rating” continues to reinforce the city’s historic lack of investment in the North End’s sidewalks and justifies it by summarily indicating that low hanging fruit (short distances with simple solutions) should be picked first. The problem with picking low hanging fruit is that the SPPP will continue to put off the needs of the North End while improving other areas simply because the North End has unique challenges. If funding or political will dries up, the North End will have no improvements, and continued lack of investment puts North End residents in worse shape than other parts of the city that have better connected sidewalk networks.

Recommendation: To ensure full transparency, NENO requests a direct and public response from the SPPP steering committee and project team addressing how the final SPPP will not repeat the City’s historic failures of avoiding building sidewalks in the North End, to include a complete and transparent accounting of the process behind the “constructability” determination, to include rubrics, scoring guidelines, and results. NENO requests that the rubrics, if they exist, and any other decision making aids and scoring of the “constructability” determination of specific projects be made public, attached to the SPPP, and presented and explained in the body of the SPPP in the same or greater detail than the current GIS analysis.

No Technological Innovation or Market Competition

Situation: The SPPP mentions a lack of quality data for tracking sidewalk gaps and other pedestrian issues, to include vehicles striking pedestrians. The SPPP makes little to no mention of (1) using private organizations to help innovate and drive the cost of constructing sidewalks down; (2) how to evaluate pilot projects or take advantage of new technologies, like precast sidewalks, frost and sulfate resistant concrete, or crowdsourcing data gathering; or (3) partnering with K-12, technical, or collegiate schools in the area to help gather and organize data.

Analysis: By relying on datasets that lack quality, the SPPP may be targeting the wrong areas for development. If the SPPP ignores advances in sidewalk technology and pilot projects, the SPPP will continue to waste precious funds on inefficient sidewalk methods. Furthermore, the SPPP should encourage bidding on sidewalk construction by private organizations to help drive down the cost of construction through free market competition, which will in turn create jobs and economic stimulus.

Recommendation: NENO advocates that market forces should be tapped to help solve the problems of cost and “constructability.” Additionally, NENO proposes that the SPPP encourage pilot projects, especially tracking concrete mix design and long term performance, and precast sidewalk technology. Crowdsourcing data gathering and partnering with K-12, technical, and collegiate schools in the local area can help fill data gaps and further drive innovative solutions. Finally, NENO recommends formally organizing neighborhood “snow patrols” in addition to neighborhood watch groups to help cover areas with homeowners who cannot physically handle snow removal.

Update Process Ambiguous and Vague

Situation: The SPPP update process is unclear. The SPPP does not indicate

- the timeline for updates (e.g., funding, team selection, drafting, public comment, adoption);
- lessons learned by the authors and collaborators who helped compile the SPPP;
- a process on how to perform the updates (e.g., alter the original draft, compile new data); and
- whether updates to the SPPP will be in line with the Saint Paul for All 2040 comprehensive plan.

Analysis: By not providing a clear path for updating the SPPP, the SPPP will likely not be updated in a timely fashion and may repeat the mistakes of previous authors.

Recommendation: NENO recommends that the SPPP lay out dates (month and year) for future updates, to include milestones like obtaining funding, team selection, drafting, and public comment. NENO also recommends that the SPPP points to specific line items in the Saint Paul for All 2040 comprehensive plan to ensure the SPPP aligns with the language of the comprehensive plan.

Scope Conflicts with Plan Update Timeline

Situation: The SPPP’s scope is “actions that can be implemented in the next five to ten years”; however, the SPPP indicates it should be updated “every five years.”

Analysis: The SPPP should focus its scope to match its update timelines, i.e., the SPPP should not suggest projects outside five years. By suggesting projects outside of the update window (five years), the SPPP

seems to be promising and planning for projects that might be unattainable given the cost constraints.

Recommendation: NENO requests that the scope of the SPPP is refocused to the update timeline (e.g., a five year scope with five years' worth of projects identified).

Vision Not Tied to SMART Goals

Situation: The SPPP's vision does not explicitly indicate that use of the pedestrian system is important: "Saint Paul is a walking city—we are healthier, resilient and connected when walking is safe and appealing for all."

Analysis: "Safe and appealing" does not equate to actual use. Reframing the vision to end with "...is safe, appealing, and performed by all" will direct appropriate measures (SMART goals—Specific, Measurable, Achievable, Relevant and Time-bound) to ensure the system that is constructed will actually be used.

Recommendation: NENO recommends that the vision be altered to include actual use and that the goals of the plan be rephrased into SMART goals with quantifiable actions (e.g., zero pedestrian deaths by automobiles by 2040).

Failure to Promote Responsible De-Icing

Situation: Salts and other de-icing chemicals are commonly overused or improperly used, leading to environmental degradation via storm water flows and concrete destruction of surrounding building foundations and infrastructure, to include the sidewalks the City is attempting to preserve. The SPPP does not mention these issues or solutions to these issues other than quoting a public comment referring to these concerns on page 43.

Analysis: Not addressing these issues continues to throw valuable money away as citizens improperly misuse de-icing chemicals and destroy sidewalks and their environment.

Recommendation: NENO suggests adding language about public education on the proper way to salt and what temperatures salt is actually effective under the SPPP's Top Near Term Actions (Table 9) under item 2-8. NENO also recommends that the SPPP educate citizens about the fact that an overabundance of salt can damage their homes, sidewalks, surrounding infrastructure, and environment.

Implied Correlations in DSI Compliance Statistics

Situation: The SPPP implies that the current snow and ice removal compliance for reported properties is due to the efforts of DSI crews:

"DSI crews inspect properties 48 hours after notice is mailed out. Typically, 80 percent of property owners who receive notice shovel their walks without further action from the city and are not assessed fees... Many have expressed concern that the current snow removal process is slow and results in sidewalks being unshoveled for too long. In response, the Saint Paul City Council revised city ordinance in 2015 to address problem properties with recurring snow and

ice violations. Property owners who have more than one violation in a calendar year are subject to immediate abatements for future valid complaints of snow and ice.” (page 43)

Analysis: The SPPP’s implication that there is a statistical correlation between the letters being mailed out and compliance is dubious. Many pedestrians do not understand the ordinance. Even if they do understand the ordinance, they do not have the time or ability to report the violation in a timely manner. Furthermore, the implication that the letters compel property owners to act might be a false signal; 48 hours might be enough time for most sidewalk issues to resolve due to weather or surrounding property owners assisting. Finally, the SPPP does not provide any statistics on the response rate of DSI crews and how many complaints are actually investigated. If DSI crews are not able to respond to every violation, then statistical sampling methodology should be provided in the SPPP to indicate that DSI crews are actually performing their tasks appropriately and effectively.

Recommendation: NENO suggests that all statistical methods that prove correlation between DSI efforts and snow and ice removal compliance are provided in the SPPP as well as the City of Saint Paul’s website. Additionally, these statistical methods should rule out weather effects (melt) and DSI crew sampling bias. Finally, NENO recommends that the SPPP encourage additional methods of reporting non-compliant properties, to include a simple email address or Twitter account where citizens can send photos of non-compliant properties, and that DSI responds in a systematic and statistically sound fashion to complaints. Considering the size of the City’s fleet and the amount of personnel traversing the City at any given time, City staff from other departments should also be required to report non-compliant properties.

Clarity

Situation: The SPPP defines terms like walking, pedestrian, constructability, and other key terms in small text boxes or in random sections throughout the document.

Analysis: Planning documents typically have a glossary because they are geared toward citizens who are not experts in all issues and do not use esoteric terms.

Recommendation: In order to increase readability, NENO requests that the SPPP define all important and uncommon terms at the beginning of the document in a glossary. This reorganization of the document will allow stakeholders who do not have a technical background to participate and use the document.

Conclusion

In the words of a former U.S. President John F. Kennedy, “we do not do these things because they are easy; we do them because they are hard.” NENO hopes that the SPPP authors will not hide behind technical jargon and opaque processes (e.g., “constructability”) simply because their task ahead is hard. Although NENO commends the SPPP authors for composing a document that takes steps in the right direction, NENO hopes that the SPPP authors will strive to create an updated SPPP that more transparently provides equitable infrastructure across the City and does not continue to repeat the

mistakes of the past.

NENO requests that (1) an additional public comment period of at least one month be opened for the second draft of the SPPP.

Thank-you for your consideration,

Rich Holst

Rich Holst

Chair

North End Neighborhood Organization

CC: Council President Amy Brendmoen

Councilmember Dai Thao

Reuben Collins

February 8, 2019

Fay Simer, Pedestrian Safety Advocate
1400 City Hall Annex
25 West Fourth St.
St. Paul, MN 55102

SUBJECT: Saint Paul Pedestrian Plan Update
MnDOT Review # CPA19-002
City of Saint Paul, Ramsey County

Dear Ms. Simer:

Thank you for the opportunity to review the preliminary draft of the Saint Paul Pedestrian Plan dated 11/6/18. MnDOT offers the following comments:

Partner Agency Expectations

For several of the recommended actions, the plan lists MnDOT as one of several agencies that are “responsible entities.” There are also references to MnDOT and other agencies in coordinating and partnering roles. MnDOT welcomes further clarification of the city’s expectations of partner agencies and the processes that will be led by the city to advance and implement the recommended actions. MnDOT’s point of contact for ongoing coordination and partnering is our Steering Committee representative, Mackenzie Turner-Bargen, at 651-234-7879 or Mackenzie.TurnerBargen@state.mn.us.

ADA Transition Plan

MnDOT notes under the Pedestrian Plan’s Policy Framework the acknowledgment of the city’s ADA Transition Plan as a supporting document and encourages the city to seek opportunities to enhance connections with the priorities of that plan. For ADA program and policy issues, please be in touch with Kristie Billiar at 651-366-3174 or Kristie.Billiar@state.mn.us.

Safe Routes to School

MnDOT commends the substantial focus and information that the plan provides on Safe Routes to Schools, as well as the city’s adoption of a SRTS policy in 2017 and participation as a member of the SRTS Steering Committee. Additional information about Safe Routes to Schools programs and funding is available from MnDOT at: <http://www.dot.state.mn.us/saferoutes/>. For questions, please contact Dave Cowan, MnDOT Safe Routes to Schools Coordinator, at 651-366-4180 or Dave.Cowan@state.mn.us.

Drainage

MnDOT will review the plans for specific projects as they are developed in the future for compliance with agency drainage requirements. Future projects may or may not require a MnDOT drainage permit, depending on site conditions. For questions regarding drainage, please contact Nick Olson of MnDOT’s Metro District Water Resources Section at 651-234-7542 or Nicholas.Olson@state.mn.us.

Review Submittal Options

MnDOT’s goal is to review proposed development plans and documents within 30 days of receipt. Electronic file submittals are typically processed more rapidly. There are four submittal options:

1. Email documents and plans in .pdf format to metrodevreviews.dot@state.mn.us. Attachments may not exceed 20 megabytes per email. If multiple emails are necessary, number each message.
2. Upload .pdf file(s) to MnDOT's external shared internet workspace site at: <https://mft.dot.state.mn.us>. Contact MnDOT Planning development review staff at metrodevreviews.dot@state.mn.us for access instructions and send an email listing the file name(s) after the documents have been uploaded.
3. Mail, courier, or hand deliver documents and plans in .pdf format on a CD-ROM compact disc to:
MnDOT – Metro District Planning Section
Development Reviews Coordinator
1500 West County Road B-2
Roseville, MN 55113
4. Submit printed documents via U.S. Mail, courier, or hand delivery to the address above. Include one set of full size plans.

You are welcome to contact me with questions at 651-234-7795.

Sincerely,

David Elvin, AICP
Senior Planner

Copy sent via E-Mail:

Buck Craig, Permits
Brian Fossand, Water Resources
Nick Olson, Water Resource
Jason Junge, Traffic
Shelia Kauppi, Area Engineer
Ben Klismith, Right of Way
Cameron Muhic, Multimodal Planning
Jeff Rones, Design
Mackenzie Turner-Bargen, MnDOT representative to Steering Committee
Kristie Billiar, ADA Program and Policy
Dave Cowan, Safe Routes to Schools
Russell Owen, Metropolitan Council

January 23, 2019

Fay Simer, Pedestrian Coordinator
St. Paul Public Works Department
25 West 4th Street - 1500 City Hall Annex
St. Paul, MN 55102

Dear Fay Simer:

I am writing on behalf of the Minnesota Pollution Control Agency's (MPCA) Saint Paul office located at 520 Lafayette Road North, Saint Paul in the Lafayette Park neighborhood. As an agency with the core mission of protecting and improving the environment and human health, we received an invitation to comment on the draft Saint Paul Pedestrian Plan. The Plan supports the Agency's Mission of protecting and improving the environment and human health.

As outlined in the draft plan, there are three main goals: to make walking safe for everyone (Goal 1), connecting vibrant communities in all parts of Saint Paul (Goal 2), and get it done (Goal 3). We are encouraged by these goals as they are in direct alignment with our agency's Strategic Plan Objectives of improving air quality in population centers and reducing Minnesota's greenhouse gas emissions from transportation.

We also value the attention given to identifying walking investments in ways that equitably distribute resources and prioritizing locations with highest need. Part of the process to identify High Priority Areas for walking investments included consideration for areas of concentrated poverty and areas where 50% or more of residents are people of color, both of which are metrics used by MPCA to identify areas of Environmental Justice Concern. We appreciate that action item 2-2 recommends studying alternative funding structures to fund new sidewalk construction and equitably distributing costs; the fair treatment component of our Environmental Justice policy ensures that no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental, and commercial operations or policies.

The MPCA supports the city's efforts to develop a comprehensive long-term Pedestrian Plan. We administer several programs and committees that could potentially engage as partners if the opportunity arises.

Thank you for your time and consideration. If you have any questions, please contact me at 651-757-2221 or by email at david.j.benke@state.mn.us.

Sincerely,



David J. Benke
Division Director
Resource Management & Assistance Division

DJB:cbg