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February 6, 2025

Dear Commissioners of the Zoning Committee:

Thank you for the opportunity to share our concerns about the proposed rezoning of 10 River Park Plaza. We believe that industrial use on this site would disregard well-documented community goals and may repeat a harmful history for the West Side community.

We are disappointed that the city approved the comprehensive plan amendment for this site over community objections and against the clear guidance in the West Side Flats Master Plan. We oppose this rezoning request because our concerns remain the same.

Two of the items on the Zoning Committee's February 13 meeting agenda display the same pattern: city disregard for neighborhood and riverfront plans that guide specific Mississippi riverfront sites to be redeveloped as mixed-use, people-oriented, and walkable.

City staff have apparently decided that these plans—developed with extensive community engagement and included as 2040 Plan addenda—are no longer valid, but without consulting the district councils involved in their creation. For both of these properties, the city is recommending industrial development that perpetuates environmental injustice and a disconnect between residents and the Mississippi River.

Friends of the Mississippi River has long been involved with development planning on the West Side Flats. We were an active participant in the 2015 West Side Flats Master Plan creation, we championed the Mississippi River Corridor Critical Area rules and forthcoming city ordinance, we have advocated on many West Side development issues, and our offices are located on the West Side.

### **Incompatible with Master Plan**

The 10 River Park Plaza comprehensive plan amendment application was approved based on a flawed analysis of the existing comprehensive plan guidance for this site. The applicant's narrative mentioned some compatibilities with the 2015 West Side Flats Master Plan (an official addendum to St. Paul's 2040 comprehensive plan), but completely disregarded the plan's clear goals for this specific parcel.

The Plan recognizes the value of industrial uses within the larger neighborhood, but clearly prioritizes this and neighboring riverfront parcels for walkable, mixed-use development.

For instance, from the Plan's Urban Design Strategy 4:

"The Esplanade represents a significant public investment and provides public access to the riverfront. The Plan promotes building uses and forms along the Esplanade that will create a memorable and vibrant public experience. Restaurants, shops and services that generate foot traffic and provide places for people to gather and socialize along the riverfront are encouraged."

The 2015 Plan already incorporates more flexible land-use recommendations over the prior 2001 Plan. This rezoning proposal asks the neighborhood to make even further sacrifices to its long-term vision by eliminating (for decades to come) the possibility of mixed-use development that appropriately complements the riverfront environment.

### **Community engagement still lacking**

We are also concerned about the lack of meaningful community engagement with the WSCO regarding this proposal. WSCO is a leader in community planning, including through its use of its Equitable Development Principles and Scorecard. It is inexcusable for city staff to make decisions about this community—decisions that are out of alignment with the neighborhood's master plan and documented goals—without proper engagement first.

This is particularly concerning for an industrial development proposal. As the city just recently acknowledged, St. Paul has a long history of displacing residential and mixed-use development on the West Side for the benefit of industrial uses. This proposal could be a repeat of that painful history.

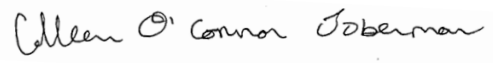
We appreciate Councilmember Noecker's interest in a Community Benefits Agreement (CBA) for this project, but that doesn't guarantee anything. CBAs are limited in what they can accomplish, especially if the city is not willing to be a party to a legally enforceable contract. CBAs without government agency backing leave underfunded neighborhoods responsible for pursuing costly legal challenges should the property owner not uphold its commitments. It is rarely a truly powerful tool for allaying community concerns.

This is even more true when St. Paul is planning to grant this rezoning before a CBA is even negotiated—then what reason does the applicant have to participate in the CBA process? What leverage does the community retain?

We oppose this rezoning request that will repeat historic environmental injustices against the West Side community.

Thank you for your consideration.

For the river,

A handwritten signature in black ink that reads "Colleen O'Connor Toberman". The signature is written in a cursive style and is enclosed within a light gray rectangular box.

Colleen O'Connor Toberman  
Land Use & Planning Director