



ZONING APPEAL APPLICATION

To/From Board of Zoning Appeals

Dept. of Safety & Inspections
Zoning Section
375 Jackson Street, Suite 220
Saint Paul, MN 55101-1806
(651) 266-9008

To / From Planning Commission

Dept. of Planning & Econ. Devt.
Zoning Section
1400 City Hall Annex, 25 W 4th St.
Saint Paul, MN 55102-1634
(651) 266-6583

Zoning Office Use Only
File # CC #25-015-636
Fee Paid \$ 462
Received By / Date 3/5/2025
Tentative Hearing Date 3/19/2025

APPELLANT

Name(s) West 7th/Fort Road Federation
Address 395 Superior Street City Saint Paul State MN Zip 55102
Email julia@fortroadfederation.org Phone 651-298-5599

PROPERTY LOCATION

Project Name FCC Environmental Services Solid Waste Truck Center
Address / Location 560 Randolph Avenue Saint Paul MN 55102

TYPE OF APPEAL: Application is hereby made for an appeal to the:
 Board of Zoning Appeals, under provisions of Zoning Code § 61.701(c), of a decision made by the Zoning Administrator.
 Planning Commission, under provisions of Zoning Code § 61.701(c), of a decision made by the Planning Administrator or Zoning Administrator.
 City Council, under provisions of Zoning Code § 61.702(a), of a decision made by the Board of Zoning Appeals or the Planning Commission.
Date of decision February 21, 20 25 File Number 25-005-778
(Zoning Code § 61.701 & § 61.702 require appeals to be filed within ten days after the date of decision.)

GROUND FORS FOR APPEAL: Explain why you feel there has been an error in any requirement, permit, decision or refusal made by an administrative official, or an error in fact, procedure or finding made by the Planning Commission or Board of Zoning Appeals. Attach additional sheets if necessary.

See attached.

RECEIVED
MAR - 3 2025
BY: S.L.

If you are a religious institution you may have certain rights under RLUIPA. Please check this box if you identify as a religious institution.

Appellant's Signature [Signature] Date 3/3/2025



West 7th / Fort Road Federation

395 Superior Street

Saint Paul, MN 55102

651.298.5599

www.FortRoadFederation.org

March 3, 2025

City Council
c/o Dept. of Planning & Economic Development
Zoning Section
1400 City Hall Annex, 25 W 4th St.
Saint Paul, MN 55102

Re: City Council Appeal: Determination of Similar Use for 560 Randolph Avenue – #24-102442

Dear Councilmembers,

On behalf of the West 7th/Fort Road Federation, I am writing to formally appeal the Planning Commission decision to deny our appeal and uphold the Determination of Similar Use issued on January 10, 2025, regarding the proposed use of 560 Randolph Avenue by FCC Environmental Services as a truck dispatch, compressed natural gas refueling station, and maintenance facility.

In addition to details outlined in our primary appeal, we will also be addressing significant concerns regarding missing testimony from the Planning Commission meeting packet and the inclusion of inaccurate documents within the city staff report that was included in the Planning Commissioners' meeting brief packet. These issues are a serious procedural error and further underscore the need for a thorough and fair review of this case.

Omissions and inaccuracies in the Planning Commission meeting packet

As you know, on February 21, 2025, the Planning Commission voted to deny the Fort Road Federation's appeal of the city's Determination of Similar Use for the proposed FCC industrial trash truck facility. Several members of the Fort Road Federation board and staff, as well as community members attended to observe. This was not a public hearing, so we did not expect time to speak. However, we were surprised when Zoning Committee Chair Taghioff began explaining the Zoning Committee discussion and some of the complexities of this issue but was interrupted for a staff report. Although a staff report may be typical, it was inappropriate to stifle the initial discussion around the committee recommendation. The conversation that followed felt superficial, and did not seem to acknowledge deep community concerns. This project will shape the vitality and development trajectory of our neighborhood for decades, and we expected a

more substantive and thoughtful discussion. The process left many with the impression that community voices were sidelined rather than meaningfully considered.

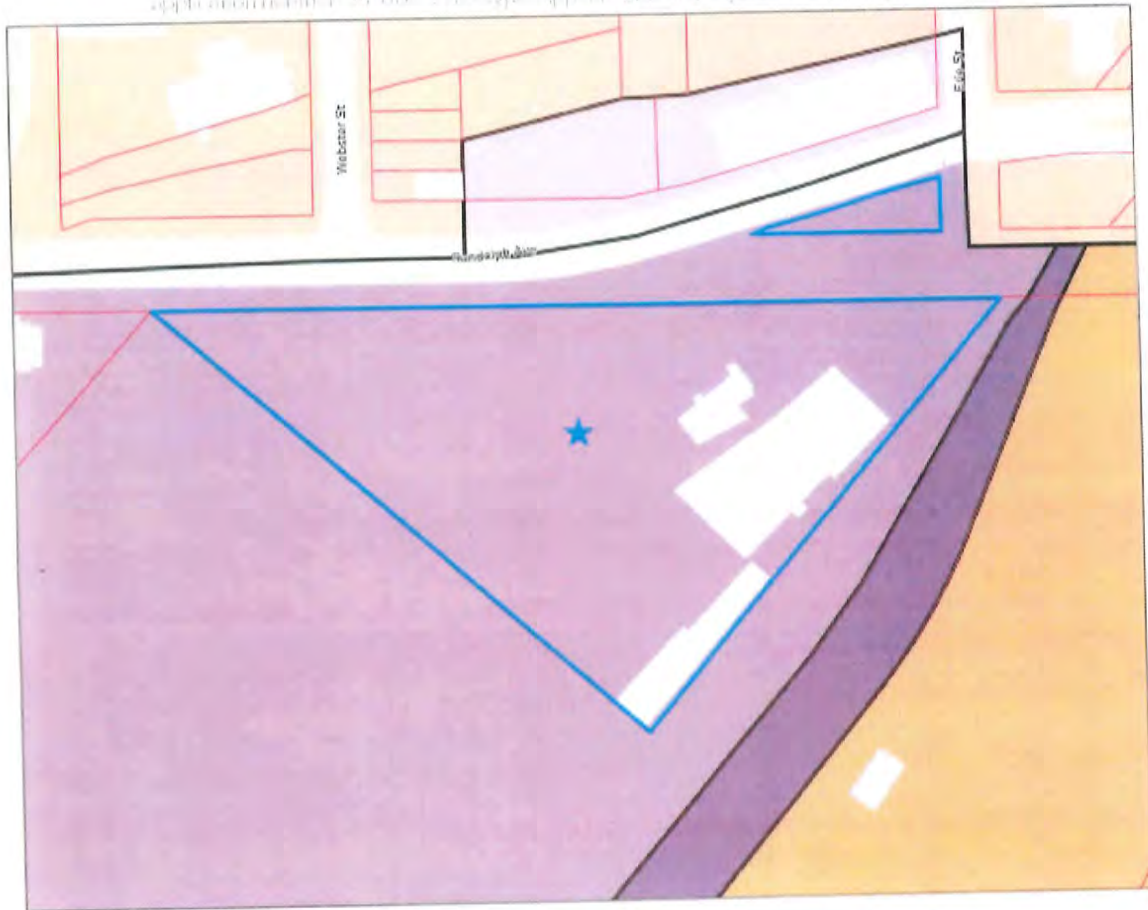
On February 24, 2025, the Federation discovered that the meeting packet provided to Commissioners was incomplete—omitting 19 written testimonies from community members as well as the Federation’s opening statement to the Zoning Committee. These missing documents contained key rebuttals to inaccuracies in the city staff report, meaning Commissioners lacked crucial context when making their decision. On February 25, 2025, a planning department staff member acknowledged via phone call that this was a “staff error” that “should not have happened.” This is not just a clerical mistake; it undermines the very process meant to ensure fair and open governance.

In addition, pages 52-54 of the Planning Commission packet contain three maps with varying degrees of misinformation and disinformation. Oddly, the maps are also included after the (partial) written testimony from West 7th community members and appear disconnected from the staff materials, which are found on pages 17-25 and 36-39. All three maps contain a heading that says “Application of West 7th/Fort Road Fed” then a label for what type of map it is. The West 7th/Fort Road Federation **did not** submit these maps which are inaccurate and inappropriately scaled. It is unclear why these maps were labeled this way and also included at the end of the document, rather than connected to the city staff documents.

Page 52 contains a zoning map of 560 Randolph (Figure 1, below) and its highly limited surroundings. Because the image is zoomed in so far, a reader only sees the sites immediately across the street, which are zoned Transitional Industrial and Traditional Neighborhood. If this map was scaled slightly larger, one would also see that immediately east of the site, less than 550 feet away, is a residential area. The site is surrounded by residential and commercial use, and the river corridor. The scale of this map misleads viewers to conclude the entire character of the area is industrial.

Application of
West Seventh/Fort Road Fed
 Zoning map

application number: 24-000 / 886 type: Appeal date: 02/12/2024 planning staff: J



- | | | | |
|---|---|---|--|
| <p>Subject parcel(s) are outlined in blue</p> | | <p>Other parcels are outlined in pink</p> | |
| <p>RL One-Family Large Lot</p> <p>H1 Residential</p> <p>H2 Residential</p> <p>RM1 Multiple-Family</p> <p>RM2 Multiple-Family</p> <p>RM3 Multiple-Family</p> | <p>T1 Traditional Neighborhood</p> <p>T2 Traditional Neighborhood</p> <p>T3 Traditional Neighborhood</p> <p>T3M T3 with Master Plan</p> <p>T4 Traditional Neighborhood</p> <p>T4M T4 with Master Plan</p> <p>OS Office-Service</p> <p>B1 Local Business</p> <p>BC Community Business (converted)</p> <p>B2 Community Business</p> | <p>B3 General Business</p> <p>B4 Central Business</p> <p>B5 Central Business Service</p> <p>IT Transitional Industrial</p> <p>ITM IT with Master Plan</p> <p>I1 Light Industrial</p> <p>I2 General Industrial</p> <p>I3 Restricted Industrial</p> | <p>F1 River Residential</p> <p>F2 Residential Low</p> <p>F3 Residential Mid</p> <p>F4 Residential High</p> <p>F5 Business</p> <p>F6 Gateway</p> <p>VP Vehicular Parking</p> <p>PD Planned Development</p> <p>CA Capitol Area Jurisdiction</p> |



Figure 1: Zoning map generated by city staff and included in Planning Commission meeting packet

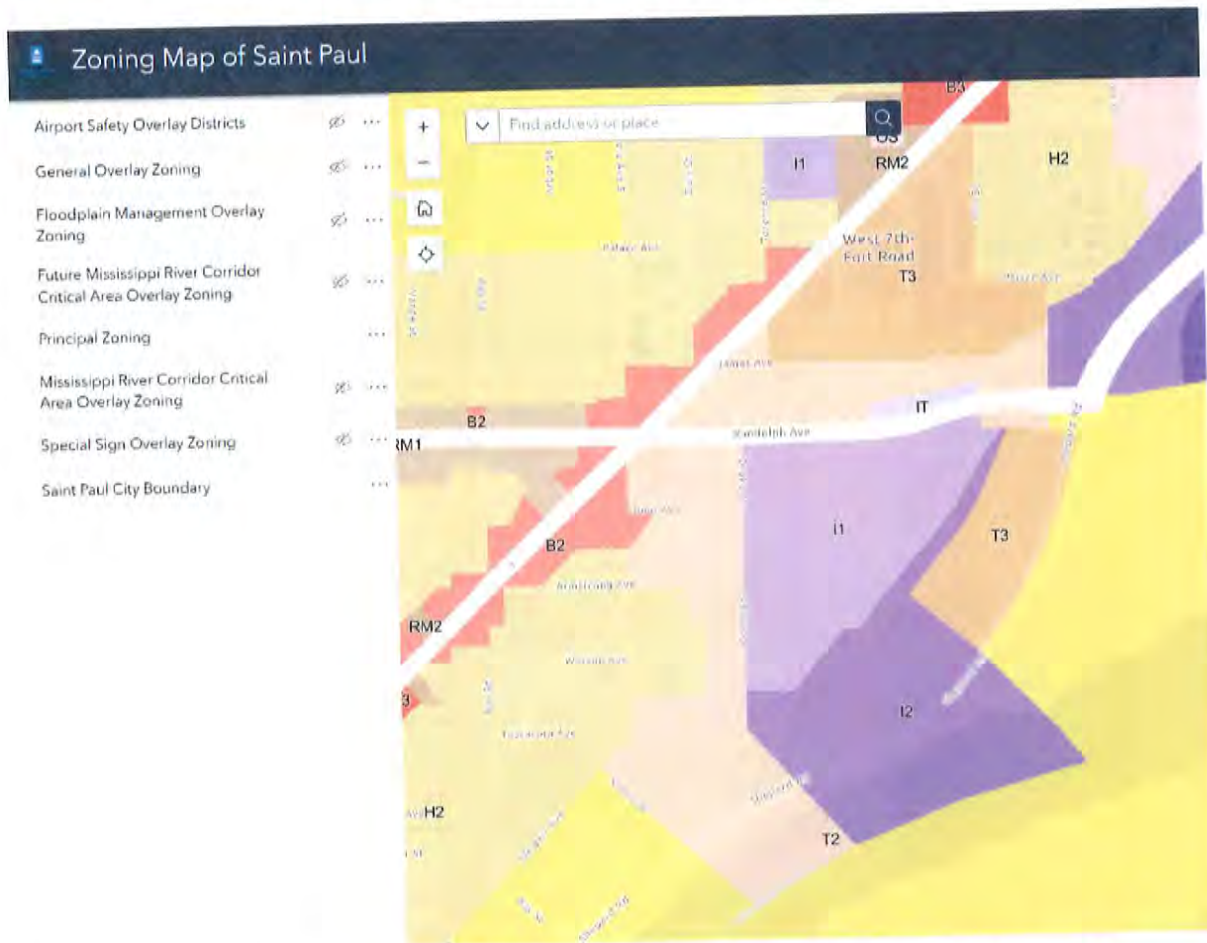
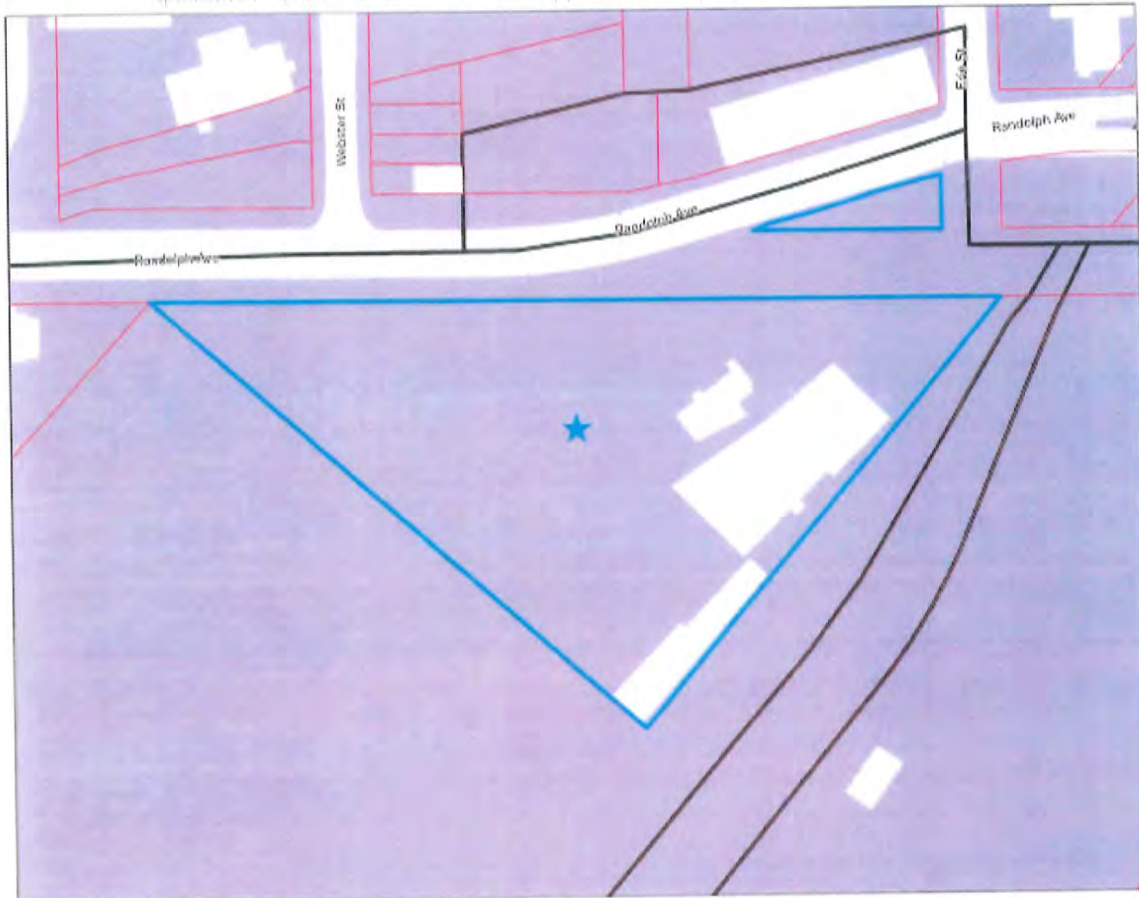


Figure 2: Zoning map of area shown at slightly larger scale, indicating the surrounding T2 and T3 Districts

The "Land Use Map" on page 53 (Figure 3 below) is also misleading. It is zoomed in to the same scale that removes any actual neighborhood context, but even worse, this map incorrectly codes the properties across the street as "Industrial and Utility" land use. They are not. A land use map is intended to show the current overall use of the land and by incorrectly illustrating the current use, it provides the impression that the surrounding area in its entirety is industrial. In fact, the small businesses across the street are in a T2 Traditional Neighborhood zoning district and are incorrectly portrayed as "industrial uses" in this map, a misrepresentation that skews the understanding of the site's context and makes the FCC site seem more appropriate than it actually is. This context is critical because *I1 Light Industrial uses are to have no external impact on surrounding sites* and because the actual zoning of adjacent parcels supports a vision for mixed-use, pedestrian-friendly development, further reinforcing the inconsistencies of FCC's proposal with the city's Comprehensive Plan, plan addenda, and adopted small area plans.

Application of
West Seventh/Fort Road Fed
 Land use map

application number: 25-000-721 - Issue Approval - date: 01/21/2025 - zoning district: 9



Subject parcel(s) are outlined in blue Other parcels are outlined in pink

- | | | | |
|---|--|--|--|
| <p>Single Family Residential</p> <ul style="list-style-type: none"> Farmstead Seasonal/Vacation Single Family Detached Manufactured Housing Park | <p>Multifamily Residential</p> <ul style="list-style-type: none"> Single Family Attached Multifamily <p>Commercial</p> <ul style="list-style-type: none"> Office Retail and Other Commercial | <p>Mixed Use</p> <ul style="list-style-type: none"> Mixed Use Residential Mixed Use Industrial Mixed Use Commercial and Other <p>Other Uses</p> <ul style="list-style-type: none"> Industrial and Utility Extractive Institutional | <ul style="list-style-type: none"> Park, Recreational or Preserve Golf Course Major Highway Railway Airport Agricultural Undeveloped Water |
|---|--|--|--|

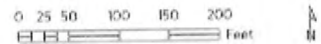


Figure 3: Land use map generated by city staff and included in Planning Commission meeting packet



Figure 4: Google Earth image confirming that the actual surrounding land use is a diverse mix of small businesses, housing, and community spaces.

In addition, the staff report contains a flawed visualization of small area plans and other formally approved river corridor plans that address the subject site. It is misleading because it suggests that the Mississippi River Corridor Plan and the Great River Passage Plan, which both outline very specific visions for mixed used redevelopment and green space of the 560 Randolph area, are no longer valid because they were linked to “decertified” comprehensive plans from previous decades. This is not true. The Mississippi River Corridor Plan and the Great River Passage Plan are city approved plans and they are still in effect, enforceable, and listed as formal addenda to the current 2040 Comprehensive Plan. As addenda to the Comprehensive Plan, these plans are part of the Comprehensive Plan; they are not secondary or outdated.

Given these procedural errors and inaccuracies, it is highly likely that commissioners were never meaningfully exposed to our arguments, if at all. It is essential to reexamine the Determination of Similar Use with full transparency and accurate information.

Zoning Implementation

There was no zoning study to implement the 2040 Comprehensive Plan.

Plans Historical Timeline

The following graphic shows the timeline for Comprehensive Plans and Comprehensive Plan Addenda that address land use and apply to the subject site.

	Plan	Comprehensive Plan in Place	Zoning Action to Implement
2000	Brewery/Ran-View Plan Summary	2020 Comprehensive Plan*	Brewery/Ran-View 40-Acre Study (ORD 00-993)
2002	Mississippi River Corridor Plan		
2005	Fort Road Development Plan		Fort Road Development Plan Zoning Study (ORD 05-99)
2010, 2013	District 9 Area Plan Summary	2030 Comprehensive Plan*	District 9 Commercial Zoning Study (ORD 11-75), District 9 Residential Zoning Study (ORD 11-76), District 9 Gateway Zoning Study (ORD 12-25)
2013	Great River Passage Plan		
2019	2040 Comprehensive Plan	2040 Comprehensive Plan	

*The 2020 and 2030 Comprehensive Plans were decertified when the successive Comprehensive Plan was adopted.

Figure 5: Table from page 24 of the Planning Commission Packet: Comprehensive Plan Summary for 560 Randolph Avenue, submitted by city staff



Figure 6: Screenshot of city web page confirming Comprehensive Plan addenda

Zoning Appeal

The Saint Paul zoning code does not list “waste hauler” as a “use”, so in order to classify the use, the City is required to examine the uses that are listed in the code, then choose one which fits best. As outlined in the City's zoning code, four specific conditions must be met for a use to be considered similar in nature to permitted uses within the district. Below, we provide a detailed analysis of how the proposed FCC facility fails to meet these criteria and why the City Council should overturn the current determination.

Determination of Similar Use Condition 1.) The use must be similar in character to one (1) or more of the principal uses permitted

The city's determination of compatible use is based on the assumption that the proposed FCC trash truck storage, dispatching, and compressed natural gas refueling site is similar to a public works or maintenance yard, a permitted use in a light industrial (I1) district. They refer to the St. Paul Public Works facility at 891 Dale Street as their example. There are multiple flaws with this comparison and several ways in which the FCC facility does not align with the 'Public Services and Utilities' zoning category.

FCC is a private company that operates as part of a multinational, multi-billion dollar conglomerate headquartered in Spain, with stated goals of expanding its municipal contracts

across the Twin Cities metro area. While the company requires 30-36 trucks to fulfill its current contract with the City of Saint Paul, the General Manager of FCC indicated in a public meeting on December 4, 2024 that its 4.27-acre facility on Randolph Avenue could comfortably accommodate up to 80 trucks. Additionally, a company representative stated in a meeting with the Federation on January 9, 2025 that FCC would consider purchasing surrounding parcels if expansion was possible. FCC's aspirations are not mere neighborhood speculation. Dan Brazil, CEO of FCC's Texas-based American subsidiary stated in March 2024 in an industry publication called 'Waste Dive': "This will really expand our Midwest presence. That was always our goal from winning the Omaha contract. There's a lot of other municipal targets around the Twin Cities area that we'll definitely be considering."

Public works facilities are designed to serve a municipality's direct needs and remain scaled accordingly. Private enterprises, by contrast, are structured for growth and profitability, which often leads to increased operational scope, vehicle traffic, and infrastructure impact beyond the scale of a municipal facility. This distinction is relevant to zoning considerations, as public works facilities are associated with essential government services and given greater flexibility in the zoning code, while private logistics hubs such as FCC's introduce commercial expansion dynamics that exceed the intended scope of the zoning classification. FCC has been very transparent about their goals for expansion. This would not be the case if the proposed use was truly similar to a municipal public works yard.

The I1 light industrial district is intended to accommodate wholesale, warehouse, and industrial operations whose external physical effects are restricted to the area of the district and in no manner affect surrounding districts in a detrimental way. The I1 district is intended to permit, along with other specified uses, the manufacturing, compounding, processing, packaging, assembly, or treatment of finished or semifinished products from previously prepared material. The proposed FCC operation does not align with these parameters, as it involves a high volume of heavy truck traffic, compressed natural gas fueling, and maintenance activities that extend well beyond the district boundaries. Given that the surrounding areas are zoned T2 and T3 Traditional Neighborhood, the external impacts of the FCC facility—including noise, pollution, and safety concerns—directly contradict the intent of the I1 zoning designation. Even if FCC keeps its operations limited to 36 trash trucks, our community will see a minimum of 150 vehicle trips per day coming and going from the site (40 or more personal vehicles of the FCC staff and drivers entering and leaving the site each day, plus 36 heavy trash trucks departing from and returning to the site every work day). A public works yard such as St. Paul's Dale Street site may see similar heavy traffic volumes only in correspondence with infrequent events such as snow emergencies. With FCC in our community, we will experience a snow emergency-like volume of truck traffic 5-6 days a week, year round.

Unlike the Dale Street Public Works Yard, FCC proposes to construct a compressed natural gas (CNG) fueling station to power its fleet. This introduces additional risks and environmental concerns that further underscore the incompatibility of the proposed FCC facility with the I1 zoning district. CNG stations require high-pressure storage and dispensing systems, which increase the risk of gas leaks and potential fire hazards, particularly in densely populated or

mixed-use areas. While CNG is often touted as a cleaner alternative to diesel, it still produces methane emissions (a potent greenhouse gas that contributes to climate change), volatile organic compounds, nitrogen oxides, and particulate matter. Additionally, CNG fueling operations generate noise from high-powered compressors and refueling activities, adding to the already significant disturbances caused by heavy truck traffic. Studies have also shown that emissions from CNG vehicles, while lower in particulate matter, still contribute to air quality degradation due to nitrogen oxides (NOx) and other pollutants. The presence of a CNG station in close proximity to residential and pedestrian-focused areas increases safety risks and environmental burdens, further highlighting the inappropriateness of this facility within an I1 light industrial zone.

The scale and intensity of FCC's operations, including the CNG fueling component, far exceed the intended scope of I1 zoning and introduce detrimental external effects that directly impact the surrounding community. Public works facilities prioritize municipal service delivery with limited external impact, whereas FCC's private waste-hauling operations would generate industrial-scale disturbances five to six days a week in a transit-oriented, mixed-use neighborhood adjacent to the Mississippi River corridor. Given these factors, the proposed use is not sufficiently similar in character to permitted public works or maintenance yard uses and does not meet the criteria for a Determination of Similar Use.

Determination of Similar Use Condition 2.) The traffic generated by such use is like one (1) or more of the principal uses permitted

The city's assertion that the proposed facility's traffic patterns resemble historical use is inaccurate. While the site previously housed a tow yard with 4–6 intermittently operated tow trucks, FCC proposes a fleet of 36 to 80 garbage trucks operating daily. This drastic increase in truck volume will create excessive congestion, noise, and wear on local streets, far exceeding what is typical of I1 zoning and what the site previously supported.

While the location near Shepard Road and West 7th Street may be convenient for FCC's operations, it is not an equitable placement for the surrounding community. The area is already burdened by high-speed vehicle throughways designed to move suburban commuters, freight traffic, and airport travelers through the neighborhood as quickly as possible. Interstate 35E, the four-lane divided Shepard Road, and West 7th Street (Highway 5) have historically prioritized vehicular traffic over local accessibility, limiting safe mobility options for residents. Adding high-volume industrial truck traffic to this already overburdened corridor exacerbates existing inequities and contradicts the city's long-term vision for balanced, multimodal transportation.

Moreover, Randolph Avenue—the primary access route for FCC's facility—is a county-owned road, meaning the City of Saint Paul does not have direct control over its investment and improvements. Unlike city-controlled streets, which can be adapted to support multimodal transportation priorities, Randolph's maintenance, upgrades, and redesigns are subject to Ramsey County's jurisdiction. This severely limits the city's ability to implement traffic calming measures, pedestrian improvements, or dedicated bike infrastructure that could mitigate the impacts of increased truck traffic beyond the bare minimum required through site plan review.

Without local control over the roadway, residents and businesses in the area will bear the burden of the increased industrial traffic without the necessary infrastructure improvements to offset its effects.

Furthermore, the 2040 Comprehensive Plan prioritizes pedestrian-friendly design and transit-supportive density in Neighborhood Nodes like Randolph-W. 7th/Schmidt (Policy LU-30). The Saint Paul Pedestrian Plan (Pg. 68) identifies this area as a priority for walking investments, and the Saint Paul Bike Plan (Pg. 9) proposes dedicated bike paths along Randolph Avenue. Introducing dozens of heavy trucks making multiple daily trips into this area creates new safety hazards for pedestrians and cyclists, directly undermining the city's transportation goals and neighborhood connectivity efforts.

This development does not merely continue a historic use—it represents a dramatic intensification of industrial traffic in an area that should be transitioning toward a safer, more accessible, and more equitable urban environment.

Determination of Similar Use Condition 3.) The use is not first permitted in a less restrictive zoning district

The operations of FCC's facility are more appropriately situated within an I2-General Industrial zoning district, rather than in an I1-Light Industrial district. While the I1 district allows for certain industrial activities, FCC's proposed facility exceeds the scope of operations permissible within this zone. The scale and intensity of their activities go beyond the established limits of the I1 district, suggesting that the facility's operations would be better suited in the I2 district, which accommodates heavier and more expansive industrial uses.

Furthermore, the proposed FCC facility does not meet the standards for initial approval within a zoning district, such as I1. The nature of the operations extends beyond the typical scope intended for I1, which is designed for lighter industrial activities with fewer impacts on surrounding neighborhoods/districts. By placing this facility within I2, a district designed to handle operations of this magnitude, it ensures that the activities are aligned with zoning regulations intended for such uses.

This argument is further reinforced by zoning practices in other jurisdictions. In Minneapolis, for example, "waste hauler" is an explicitly defined land use that requires a **conditional** use permit in I2 General Industrial and I3 Heavy Industrial zones. This suggests a broader recognition of the potential neighborhood impacts associated with waste-hauling operations. Unlike Minneapolis, the City of Saint Paul has not designated waste hauling as a distinct use within its zoning code, which raises concerns about whether the current determination appropriately accounts for the facility's full impact on the surrounding area.

In essence, the current location in the I1 district does not align with the scale of FCC's operations. Instead, the I2 district would provide a more fitting framework to mitigate potential impacts on the surrounding area, ensuring that zoning laws are adhered to in a way that balances industrial needs with the well-being of the community.

Determination of Similar Use Condition 4.)The use is consistent with the Comprehensive Plan.

We have been consistently informed by city staff, attorneys, and members of the Planning Commission that “the Comprehensive Plan trumps all.” On this point, we agree. The 2040 Comprehensive Plan, along with its formally adopted addenda—such as the Great River Passage Plan and the Mississippi River Corridor Plan—establishes a clear policy direction that conflicts with the development of an industrial trash truck facility at this critical neighborhood node.

However, the claim that “the Comprehensive Plan trumps all” is often used to justify prioritizing a single section of one map in the plan’s appendix over the numerous conflicting policies and formally adopted addenda that specifically guide the future of this site. This narrow interpretation fails to account for the broader intent of the Comprehensive Plan—to provide a cohesive and balanced vision for land use across the city. Relying solely on the future land use map while disregarding the plan’s established policies results in an incomplete and misleading application of the city’s long-term goals. Using this single map as the definitive ruling shuts down meaningful discussion about the broader objectives of the Comprehensive Plan; and it has been used that way throughout this process.

This approach also ignores several key contradictions within the 2040 Comprehensive Plan itself, as well as the addenda to the plan (most notably the Great River Passage Plan and Mississippi River Corridor Plan, but also the Fort Road Development Plan and the Brewery/Ran-View Plan). These addenda, while acknowledging the potential for industrial use “for some time,” specifically foresee residential development as a long-term use for this site. In fact, as Bill Dermody, Planning Manager, noted in his February 7, 2025 memo to Farhan Omar, the plans—including the Brewery/Ran-View Plan and the Great River Passage Master Plan—identify this location for eventual residential use, contingent on site cleanup and redevelopment. As Dermody states, “The four Comprehensive Plan addenda that address this site’s future land use foresee residential as a possible long-term use,” and the Great River Passage Master Plan and Brewery/Ran-View Plan explicitly acknowledge that industrial uses are slated to continue temporarily.

While industrial uses may continue for some time, allowing FCC’s operations on this site will further entrench the property’s industrial character, making it more difficult, if not impossible, to transition the site or surrounding parcels to the mixed-use or residential purposes envisioned in the city’s long-term plans. These plans, authored in partnership with the community, represent a consensus of multiple city-adopted strategies and reflect a clear preference for future residential or mixed-use development that aligns with the broader vision for neighborhood connectivity, environmental quality, and pedestrian-friendly spaces. By allowing industrial operations to persist without addressing these forward-looking policies, the city would undermine its own stated goals for the site and delay or complicate future efforts to transition this critical property into the vibrant, sustainable neighborhood the city and community envisions.

Policy LU-46 of the Saint Paul 2040 Comprehensive Plan states:

“Retain and protect current industrial land from conversions to residential or institutional uses unless guided otherwise in a City of Saint Paul adopted plan.”

While Policy LU-46 advocates for retaining industrial land, the site in question is explicitly guided toward alternative uses by several city-adopted plans. These plans, which are still in effect, consistently identify 560 Randolph Avenue as a critical site for redevelopment with mixed-use housing or river-oriented projects that enhance public access and neighborhood connectivity.

- The **Great River Passage Plan** (2013) explicitly designates 560 Randolph Avenue as a key river oriented redevelopment site, emphasizing its role in reconnecting the West 7th corridor to the Mississippi River. The plan outlines a vision for transforming former industrial areas along the river into vibrant, mixed-use spaces that enhance public access, neighborhood livability, and environmental stewardship. Specifically, the plan prioritizes integrating green infrastructure, improving roadway aesthetics, and fostering development that maximizes proximity to the river while maintaining public access. It further identifies this site as critical to the Island Station redevelopment area, reinforcing the importance of pedestrian-friendly design and river-oriented land use.
- The **Mississippi River Corridor Plan** (2002) identifies the site as part of a broader vision for urban redevelopment, emphasizing river access and connections to the surrounding neighborhood.
- The **Fort Road Development Plan** (2005) supports rezoning of this site and prioritizes this location for creating public green spaces and integrating pedestrian-friendly streetscapes along Randolph Avenue.
- The **District 9 Small Area Plan** supports rezoning this site to better reflect changing land use patterns.

While the site remains zoned industrial today, multiple city-adopted plans—including the Great River Passage Plan, Mississippi River Corridor Plan, Fort Road Development Plan, and Brewery/Ran-View Plan—clearly envision its transition to mixed-use and residential development.

The failure to formally rezone the site does not indicate that industrial use remains appropriate, but rather that city processes have not yet caught up with the city’s own long-term vision. Delays in rezoning may have resulted from competing priorities, staffing constraints, or administrative processes, but these factors do not override the planning documents that explicitly guide this site’s future use. The continued industrial zoning of 560 Randolph Avenue is an oversight—one that must be corrected to align with adopted policies. If the city is committed to implementing its long-term planning vision, this site should be rezoned accordingly to prevent an incompatible industrial use from undermining decades of strategic planning and community engagement.

Even the staff report prepared for the Zoning Committee acknowledges that the Great River Passage Plan envisions redevelopment of this site “as opportunities arise”—which is exactly what we are arguing for today. These plans are not “de-certified” or of lesser importance than

what is written in the current plan. They remain formally adopted addenda to the 2040 Comprehensive Plan and continue to hold full policy weight.

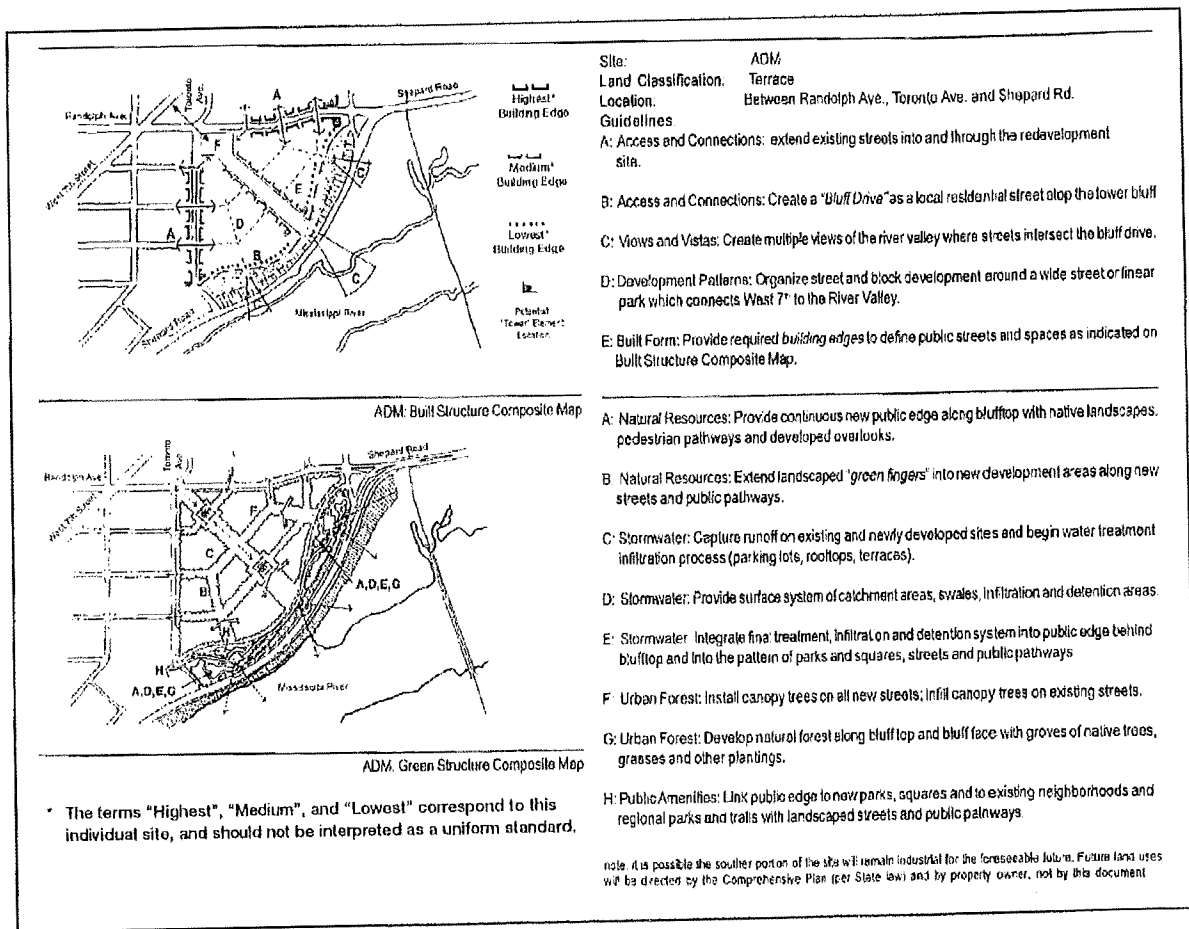


Figure 7: Mississippi River Corridor Plan vision for key redevelopment sites along the river

Island Station Vision Plan
GOALS & OBJECTIVES

Redevelop Island Station to become a center for river-oriented arts and leisure activities

The premises on which the old Island Station power plant is located will be transformed, through a public-private partnership, into a mixed-use center for adventure, recreation, visitor services, residences, offices, and a community park with public access to the River. The repurposed building can become a center for non-for-profit environmental and art organizations, including the National Park Service regional office, hotel, restaurants, shops and cafes. Offices can occupy upper floors, while industrial-scale studios, river-oriented cottage industries and adventure sports activities can occupy the lower and ground levels, attracting people year round.

Utilize redevelopment to link the West 7th Street corridor to the river

Redevelopment of Island Station and the ADM site will provide a major missing piece to provide public access to and along the river between downtown and the Valley reach. Green connections between the peninsula and Shepard Road extend to the neighborhoods and to the West 7th Street business district. Enhanced streetscape support redevelopment opportunities and pedestrian friendly neighborhood expansion along Randolph Avenue.



67
GREAT RIVER FEDERATION

Figure 8: Page 67 of the Great River Passage Plan

Furthermore, numerous other policies within the 2040 Comprehensive Plan—spanning Land Use, Transportation, Housing, and the Parks, Recreation, and Open Spaces chapters—reinforce the incompatibility of the proposed facility with the city’s long-term vision. While these policies may not reference this site explicitly, they collectively establish a framework that prioritizes pedestrian-friendly, mixed-use redevelopment and environmental stewardship—principles that stand in direct contrast to the proposed industrial use.

- Land Use Policy LU-1: *Encourage transit-supportive density and direct the majority of growth to areas with the highest existing or planned transit capacity.*
- Land Use Policy LU-2: *Pursue redevelopment of Opportunity Sites (generally sites larger than one acre) as higher-density mixed-use development or employment centers.*
- Land Use Policy LU-4: *Invest in measures that minimize displacement in neighborhoods where the proximity to high-frequency transit has increased redevelopment pressure and/or housing costs.*

560 Randolph Avenue, located within the Randolph-W. 7th/Schmidt Neighborhood Node, is a 4.27-acre site that aligns with multiple key land use policies in the 2040 Comprehensive Plan. Land Use Policy LU-1 encourages transit-supportive density and directs growth to areas with high existing or planned transit capacity. This site, with its proximity to a vibrant community node, transit access, parkways, and a river valley view, is ideal for residential development, not industrial use. Land Use Policy LU-2 prioritizes the redevelopment of sites over one acre for higher-density mixed-use development or employment centers, making 560 Randolph an optimal candidate for such transformation. Additionally, Land Use Policy LU-4 calls for minimizing displacement in neighborhoods experiencing redevelopment pressure and rising housing costs. As West 7th is set to benefit from planned transit investments, this site presents a prime opportunity to build new housing, particularly multi-family and mixed-use development, which the community supports. Instead of contributing to displacement through the demolition of historic working-class and immigrant-built homes, the city should focus on redeveloping underutilized properties like 560 Randolph, ensuring alignment with transit-oriented growth and community stability.



Figure 9: 2040 Comprehensive Plan Map of planned and potential transit ways

- Land Use Policy LU-21. *Identify, preserve, protect and, where possible, restore natural resources and habitat throughout the city*

The city's adopted land use policies emphasize protecting natural resources and sensitive environmental areas, particularly along the Mississippi River corridor. Placing a high-impact industrial facility—with a 4.67-acre parking lot for trash trucks and a CNG refueling station—within 1,200 feet of the river and 800 feet of a floodplain forest directly contradicts these priorities. This development would introduce increased stormwater runoff, vehicle emissions, and potential hazardous waste byproducts, all of which pose environmental risks to the river ecosystem and surrounding green space.

Furthermore, the 2024 Comprehensive Plan places significant focus on Neighborhood Nodes, which includes Randolph-W. 7th/Schmidt Intersection and the area that encompasses the proposed FCC site.

- Land Use Policy LU-30. *Focus growth at Neighborhood Nodes using the following principles:*
 - Increase density toward the center of the node and transition in scale to surrounding land uses.*
 - Prioritize pedestrian-friendly urban design and infrastructure that emphasizes pedestrian safety.*

- (c) Cluster neighborhood amenities to create a vibrant critical mass.*
- (d) Improve access to jobs by prioritizing development with high job density.*

This site serves as a gateway to West 7th's historic and evolving commercial corridor, making its use especially important in shaping the neighborhood's future. Placing an industrial truck yard here directly contradicts the city's stated goals for neighborhood development. A trash truck dispatching facility is not a community amenity—it is a significant detractor from residents' quality of life.

Using valuable land within a designated Neighborhood Node to store and refuel trash trucks is a missed opportunity for higher-density housing and mixed-use development at a key transit hub. The 2040 Comprehensive Plan prioritizes walkable, pedestrian-friendly urban design, particularly in Neighborhood Nodes like Randolph-W. 7th/Schmidt, where accessibility, safety, and connectivity between homes, businesses, and transit are essential. However, the FCC facility would introduce high-volume industrial traffic, increasing safety hazards, noise, and air pollution, making the area less safe and less accessible for pedestrians and cyclists. Instead of fostering a vibrant, walkable district, this development would undermine the city's investments in pedestrian infrastructure and transit accessibility, limiting the area's long-term potential.

- Land Use Policy LU-31. *Invest in Neighborhood Nodes to achieve development that enables people to meet their daily needs within walking distance and improves equitable access to amenities, retail and services.*
- Land Use Policy LU-32. *Establish or enhance open space close to Neighborhood Nodes, such as public parks, publicly-accessible private open spaces, and school playgrounds.*
- Land Use Policy LU-33. *Promote amenities that support those who live and work in Neighborhood Nodes, including frequent transit service, vibrant business districts, a range of housing choices, and neighborhood-scale civic and institutional uses such as schools, libraries and recreation facilities.*

The proposed industrial trash truck facility at 560 Randolph Avenue directly contradicts key principles outlined in the 2040 Comprehensive Plan. Land Use Policy LU-31 calls for investments in Neighborhood Nodes that provide equitable access to amenities, retail, and services, yet this development fails to offer any of these benefits, burdening the West 7th neighborhood without contributing to its vibrancy. Similarly, Land Use Policy LU-32 promotes enhancing open space near Neighborhood Nodes, but this facility will only detract from nearby parkland, making access to the river and surrounding green spaces more difficult and dangerous. Furthermore, Land Use Policy LU-33 encourages amenities that support residents and workers, such as transit service, vibrant business districts, and diverse housing options, none of which this facility provides. Instead of contributing to the neighborhood's growth and well-being, this development undermines existing resources and opportunities for revitalization in the area.

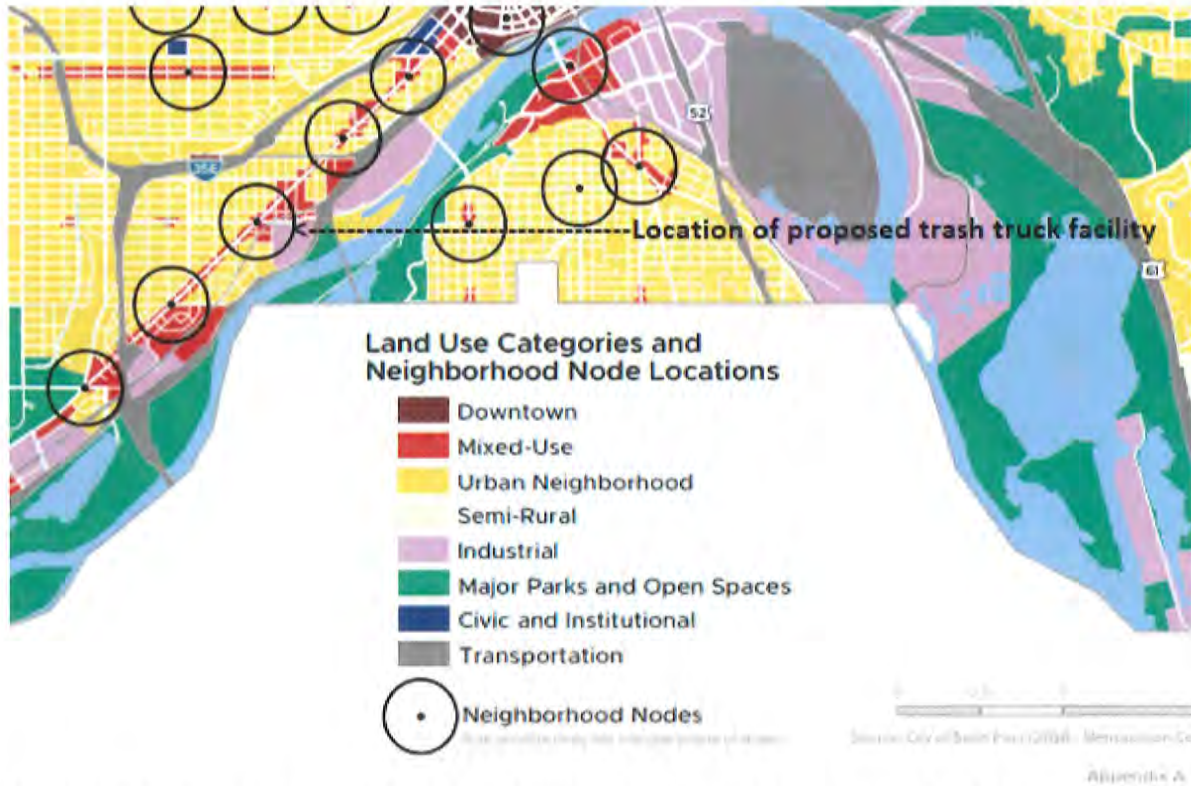


Figure 10: 2040 Comprehensive Plan map of neighborhood nodes and proposed FCC site

- Transportation Policy T-33. *Improve pedestrian and recreational connections to the Mississippi River.*

Policy T-33 of the 2040 Comprehensive Plan calls for improving pedestrian and recreational connections to the Mississippi River. However, Randolph Avenue—a primary route to the river—is already a high-volume roadway in failing condition, with significant areas missing sidewalks on both sides of the street and no bike lanes between West 7th and Shepard Road. The introduction of dozens of heavy industrial trucks making daily trips to and from the FCC site would make conditions even more dangerous for pedestrians and cyclists. Rather than strengthening pedestrian connections to the river, this development would further isolate the neighborhood from its waterfront.

Goal 5: Sustainable and equitable maintenance models.

- Transportation Policy T-38. *Reduce the number of heavy vehicle trips on local streets through measures such as consolidation, coordination and route designation/planning, in order to reduce maintenance costs.*

Goal 7: Functional and attractive Parkways.

- Transportation Policy T-41. *Maximize space for recreation and landscaping uses within Parkway rights-of-way, and prioritize recreation and landscaping in*

Parkway design in order to maintain a park-like feel, particularly on the Grand Round.

The proposed FCC trash truck facility contradicts several key goals and policies aimed at creating a more sustainable, equitable, and functional community. Goal 5, which focuses on sustainable and equitable maintenance models, is undermined by the proposed development, as Transportation Policy T-38 seeks to reduce the number of heavy vehicle trips on local streets. With up to 80 garbage trucks per day running through a designated Neighborhood Node, this industrial facility directly contradicts the goal of minimizing local street maintenance costs. Similarly, Goal 7 aims to preserve and enhance functional and attractive parkways, while Transportation Policy T-41 emphasizes maximizing space for recreation and landscaping within Parkway rights-of-way, particularly along the Grand Round. The proposed FCC facility, situated immediately adjacent to the Grand Round, introduces a heavy industrial use with high-volume truck traffic, directly undermining efforts to maintain a park-like feel and prioritize recreational space in this critical area.



Figure 11: Map of the Grand Round scenic byway through St. Paul

- Parks and Recreation-Policy 44: *Support facility improvements that better connect neighborhoods to the Mississippi River.*

Parks and Recreation Policy 44 emphasizes the importance of supporting facility improvements that better connect neighborhoods to the Mississippi River. However, locating a trash truck facility along one of the neighborhood's only access points to the river directly contradicts this policy. Rather than improving connectivity, this facility would exacerbate the existing disconnect between our neighborhood and the river, blocking access, disrupting the natural landscape, and hindering the community's ability to engage with this vital resource. The proposed development undermines the intent of this policy, which aims to strengthen ties between the neighborhood and the river, not further isolate them.

While no single development can align perfectly with every policy in the 2040 Comprehensive Plan, the weight of the policies and adopted plans overwhelmingly support granting this appeal. The determination that FCC's proposed use is consistent with the Comprehensive Plan is based on a narrow interpretation that prioritizes one section of the Future Land Use Map while disregarding numerous conflicting policies, other maps, and formally adopted addenda. The Great River Passage Plan, Mississippi River Corridor Plan, and Fort Road Development Plan provide clear, forward-looking guidance that envisions this site transitioning to mixed-use or residential development. By approving FCC's industrial facility, the city would not only entrench the existing industrial character of the site but also actively obstruct the realization of its own long-term planning goals. The City Council has an opportunity to correct this misalignment, uphold the integrity of the Comprehensive Plan as a whole, and ensure that land use decisions reflect the broader vision for sustainable, transit-oriented, and pedestrian-friendly development at this critical neighborhood node.

Social and environmental equity

The Carter Administration claims to lead "with an unapologetic equity agenda." If that commitment were fully realized, we would not be arguing this appeal today. True equity would have been considered at every stage of the city's decision-making process, including the development of the trash collection request for proposals. Had equity been a guiding principle, the placement of this trash truck facility in the West 7th neighborhood would never have been considered.

West 7th, with its unique geography and history as a working-class immigrant enclave, has been disproportionately impacted by harmful infrastructure decisions, systemic disinvestment, and environmental burdens. In the 1940's the entire district was red-lined. The Hudson Maps labeled most of our area a Class D6 and D7 neighborhood, which meant it was so undesirable at the time it was classified as "hazardous." These maps were used to classify mortgage lending risk and helped usher in decades of disinvestment and blighted properties. In the 1950s, George Shepard, Chief Engineer for the Saint Paul Department of Public Works, further harmed West 7th neighborhoods to build a four lane, divided urban highway along our river's bluffs. This project cut off resident access to the Mississippi River, destroyed Fountain Cave, and reinforced the trend of prioritizing commuter traffic over neighborhood well-being. In the 1970's, a significant part of our community was destroyed when MnDOT forced Interstate 35E through our community. Through the construction of 35E, one-third of the housing stock in West 7th was demolished. Hundreds of working class homes and businesses were destroyed to make way for

this urban freeway. This damaged community institutions like schools and churches, disconnected our community from neighbors up the hill, and subjected residents to air and noise pollution and the on-street impacts of speeding vehicles approaching or departing on and off ramps.

Between 2000 and 2004 our neighborhood was home to the only urban ethanol plant in the country, Gopher State Ethanol, which operated at the former Schmidt Brewery site. Residents suffered from air and noise pollution, as well as noxious odors during its operation. The Fort Road Federation and community partners successfully shut the operation down and we now have a thriving site that provides low income housing for artists.

Our community remains home to Xcel Energy's High Bridge plant. Though it was upgraded to cleaner burning natural gas in 2008, this was a coal-fired plant from 1923 to 2008. Many community members still recall the days when black soot covered outdoor furniture and air quality was much lower. Even after the upgrade, air quality concerns associated with natural gas pipelines and gas combustion remain.

Despite these longstanding challenges, West 7th has remained a resilient and socioeconomically diverse community. According to Minnesota Compass data, 12.2% of households in the neighborhood lack access to private vehicles, with 7.6% of residents commuting via public transit and 24.2% walking, biking, or working from home. Furthermore, 28.5% of households earn less than \$35,000 per year, with an additional 11.7% earning between \$35,000 and \$49,999. These statistics highlight the critical need for safe, accessible, and multimodal transportation options that support all residents—especially those facing economic hardship.

Given this history of environmental injustices and systemic disinvestment, placing an industrial waste-hauling facility in West 7th is not just an issue of zoning—it is a fundamental equity issue. This community has repeatedly been forced to bear the burden of decisions that prioritize regional traffic flow and industrial expansion over local well-being. A truly equitable city planning process would recognize this history and actively work to prevent further harm.

Neighborhood and geographical context

FCC's site is less than a quarter mile from a major transit stop at Randolph and 7th and located within a neighborhood node. It sits a mere 1200 feet from the river, one block from the Schmidt Brewery Historic District, a thousand feet from our community clinic, and two blocks from a residential area.

Bridgeview School, St. Paul's specialized public school that serves the learning needs of students with severe and profound low-incident developmental disabilities is located $\frac{1}{3}$ mile from this site.

The Hazelden Betty Ford Foundation operates an addiction clinic and sober living campus less than a $\frac{1}{4}$ mile from the site.

The Schmidt Artists lofts, which provide low income housing for artists and support a highly diverse population is 650 feet from this site.

The City has suggested this site may sit above Fountain Cave, a significant geologic and historic asset for not only West 7th, but the city and state as well.

The site is 600 feet from the Sam Morgan Regional Trail and Grand Rounds, connecting Crosby Farm Regional Park to downtown.

Access to the Mississippi River: Although West 7th is bound by the Mississippi River, Shepard Road, railroad tracks, and the bluffs act as a barrier. Randolph is one of our neighborhood's only access points to the river and one of few places to cross Shepard Road. This area has been hostile to pedestrians, cyclists, and residents for many decades. Allowing a trash facility to be constructed here simply hardens the industrial, inhospitable character of the site.



Figure 12: Map of proposed site in relation to other community assets and housing

Conclusion

We urge the City Council to uphold the integrity of Saint Paul's long-term planning framework and grant our appeal. City staff have indicated throughout this process that some of these plans are "aspirational." But isn't that the purpose of planning? Plans guide our investment decisions and establish priorities for the city's future. Many so-called aspirational plans—such as Highland Bridge, West Side Flats, and The Heights—have received the necessary follow-through, with dedicated staff time, resources, and investment to bring them to life. West 7th deserves the same opportunity for thoughtful, strategic development that aligns with long-term city goals.

Choosing industrial use for this site may provide a short-term increase in tax revenue, but it comes at a significant long-term cost to the community. By allowing FCC's facility, the city would effectively foreclose future redevelopment at this site and surrounding parcels, eliminating the potential for higher-value residential and mixed-use development that would generate far greater tax revenue over time. This decision would not only limit economic growth in West 7th but also result in a lasting financial loss for the city as a whole.

While the FCC site will shape the long-term development trajectory of our entire neighborhood, this is not just about the West 7th community: ignoring planning and suppressing public input is a citywide issue. Think of the message this sends to your own constituents and all the communities throughout this city who have participated in the public planning and decision-making process. If our appeal is rejected, the message the city sends to its residents is that your work means nothing and your input does not matter. Constituents will remember the times when city plans were ignored because it was inconvenient to follow them. Previous city leaders and planners spent years building public trust through these processes—once that trust is broken, it will be exceedingly difficult to rebuild.

At its core, this appeal is about more than just land use—it is about maintaining the integrity of zoning principles and ensuring that similar uses are truly evaluated in good faith. The proposed FCC facility is not a public works maintenance yard. It is a private, for-profit industrial operation that is fundamentally different in scale, intensity, and impact. Public works yards are designed to serve the specific needs of a municipality, scaled accordingly, and located with community benefit in mind. FCC's facility, by contrast, will generate continuous industrial traffic, introduce safety hazards, and limit future redevelopment opportunities in a neighborhood prioritized for mixed-use growth.

We urge you to grant this appeal and reaffirm the city's commitment to thoughtful, community-driven planning that aligns with long-term goals, rather than allowing a misapplication of zoning to dictate the future of this critical site.

Sincerely,



Meg Duhr
Board President
West 7th/Fort Road Federation



Julia McColley
Executive Director
West 7th/Fort Road Federation