

June 13, 2019

Mr. Michael Wade City of Saint Paul Department of Planning and Economic Development 1400 City Hall Annex, 25 West Fourth Street Saint Paul, MN 55102

Dear Mr. Wade:

Thank you for your inquiry regarding the Port Authority's position on the proposed rezoning of 84 Water Street.

The Port Authority's strategic plan call for the protection of industrial zoned property and if rezoned, to identify alternative sites for conversion to industrial zoning to create an explicit No Net Loss of Industrial zoned land policy.

It is incredibly important for the Port Authority and other stakeholders and policymakers to understand the impact of this and other conversions of industrially zoned land to residential uses. Industrially zoned land is our most consistent provider of development with well-paying jobs with low barriers to entry, which are critical to furthering equity goals and the reduction of poverty in Saint Paul.

It will take an explicit policy stand to protect our industrial land for job creation and retention, and business growth. The continued loss of the land that allows for these types of jobs directly contradicts the City's own policies and priorities related to social equity and the reduction of racial and economic disparities.

In this specific case, the subject parcel lies within a functioning industrial node that was only recently rezoned to IT (industrial transition), with numerous nearby parcels rezoned to T3, which would allow for this type of redevelopment for a residential use. These IT parcels were not rezoned to T3, likely in a conscious effort to reinforce their continued use for job producing commercial/industrial uses. The parcel is adjacent to several other large industrial buildings that, if in need of expansion and/or occupied by job dense "maker space" and



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"creative office" uses encouraged in the 2040 Comprehensive Plan, have lost potential parking or expansion opportunities, and additionally introduced an incompatible use into an otherwise industrial zone.

While market and neighborhood forces may push towards higher density residential uses over industrial, we must ask, "where will the City then compensate for the loss of land for industrial job opportunities with low barriers to entry, and loss of net positive tax base?" Thank you for the outreach and opportunity to comment on the proposal.

Sincerely,

Monte Hilleman

Senior Vice President of Real Estate Development