



Date: December 14, 2011

To: City of St. Paul City Council

From: Isabel Broyld, University Avenue Business Preparation Collaborative (U7),  
U7 Project Manager

Ref: City of St. Paul – Proposed City Wide Signage Ordinance

First, thank you to all the Councilmembers for your continued commitment to the City of St. Paul and the safety of its neighborhoods. Secondly, as staff of U7, we are writing this correspondence to provide our feedback and concerns about the proposed City-wide window signage ordinance. We also have feedback on the proposed window signage compromise referenced in a memo from Ricardo X. Cervantes, DSI Director to the St. Paul City Council.

U7 is a collaborative business preparation project that is housed at Neighborhood Development Center. U7's work is to provide opportunities and free to low cost services to over 500 small mom and pop businesses along the Central Corridor in St. Paul. U7 services include branding, design, marketing and promotions, accounting/bookkeeping and overall business management assistance. U7's service areas include Lowertown, Downtown and University Avenue, up to the Minneapolis border. To date, U7 has provided services and assistance to over 200 businesses along the corridor. U7 does not represent the voice of small business or mom and pop business owners. However, U7's grassroots work over the last two years with small business owners does provide us with experience and more insight of the small businesses' perspective on the hardships, challenges and opportunities they encounter.

The feedback the U7 staff is providing comes from the perspective of the small business owners, especially those business owners that have businesses in low-income communities and who are, in many cases, low-income business owners. Although, we agree that each business district in the city should have its own signage regulations and that quality design is a good indicator of a healthy and vibrant local economy, we do not agree that at this time the City of St. Paul is ready to impose a City-wide window signage ordinance on all business owners for the following reasons:

1. **We agree that negative marketing and the bombardment of the marketing of tobacco in low-income communities of color needs to be greatly reduced.** We agree that this is a problem that needs to be solved. **However, this ordinance goes way beyond this foundational issue.** There were originally two rooted issues that motivated this city-wide ordinance: 1) safety and 2) tobacco companies targeting low-income communities by marketing their ads through local businesses. How these two issues cause the urgent need for a larger city-wide signage ordinance is not clear.
2. **It is best practice in public policy that those stakeholders who will be the most affected by a change should be engaged in the process of that**

- change.** We do not have a sense that the smaller mom and pop business owners, especially those in low-income communities, have had a real opportunity to be part of this discussion or the solution. In our very brief review, this is an underrepresented group of stakeholders in this decision. We feel that this ordinance could potentially have the largest negative impact on these small mom and pop business owners who operate in areas where no current sign ordinance exists. Once more, the small mom and pop businesses should be highly engaged in this discussion.
3. **We would fully support a city-wide window signage solution that makes the most sense for the business community and the neighborhoods.** However, we would do so only if a larger representation of small business and mom and pop business owners are engaged in the effort. We believe that the best way to create sign ordinances that will gain the highest-levels of buy-in from the businesses owners is to provide each business district the opportunity to cultivate its own, like Grand Avenue.
  4. **Quality design and solid marketing is very expensive and is not a service affordable or even accessible to the majority of the small mom and pop businesses.** Also, there is a lack of marketing avenues affordable to mom and pop business owners. Radio ads, direct marketing campaigns and TV ads are very expensive; the internet and social media are tools that can be more affordable but there is a lack of knowledge about how to get and utilize these types of marketing tools. We found that the lack of access to these essential business marketing tools is the main reason that many businesses clutter their windows with ads. **The business owner's windows are the only marketing "real estate" they have, and window signage has been excessive. We are just one group that is working towards educating business owners on quality, affective and affordable marketing alternatives.**
  5. **We understand the safety concerns associated with particular businesses, that choose to have the windows of their establishments covered from top to bottom with ads; however, we feel that the good efforts to limit these types of behaviors by specific types of businesses are now being imposed on all types of businesses.** There are hundreds and hundreds of small businesses that will never be interested in selling tobacco in their establishments, so they would never have negative or harmful tobacco or liquor ads to display in their windows.
  6. We are hoping that the all of the parties already engaged in this process have done their due diligence and researched what other cities in the U.S. have done to address window signage issues and what the effects those policies



- have had on low-income business communities. This would be valuable information to have before proceeding with such a city-wide effort. This is also an economic development issue as well: we want to support small businesses and their growth.
7. We are against the 25% rule. We do not understand its relevance to the concerns brought forth. We feel this limitation causes more hardships to small business owners for many of the reasons we already stated in this memo.
  8. We are much more positive of the compromise presented by Mr. Cervantes, to have the solution be on a case-by-case basis, through licensing reviews. However, we still encourage the direct involvement of small mom and pop businesses in the further elaboration of this solution. We feel that the concerns about how much space and what space within windows can be used for signage is much easier to understand in his proposal and easier to enforce. We also appreciate that not all businesses will be seen or treated the same and that there will be exceptions to the rules.

If we can be of any assistance in formulating a solution we will make our time available to the effort. We are in full support of an educational campaign to promote the benefits of signage districts in low-income communities. We also feel that the Central Corridor is a nice place to begin such educational efforts.

We do have one important additional request. If for some reason the City Council approves this window signage ordinance as is, we are asking that the City Council wave the Central Corridor businesses from having to adhere to the ordinance until after the lightrail construction is fully completed, which will be in 2013. We are very willing to discuss this particular request further, if needed.

Gracias,

A handwritten signature in black ink, appearing to read 'Isabel Broyld', written over a horizontal line.

Isabel Broyld  
U7 Project Manger

