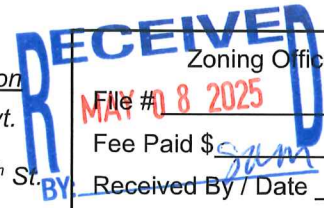




ZONING APPEAL APPLICATION

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 # 8 2025
Fee Paid \$ 500.00
Received By / Date _____
Tentative Hearing Date _____

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 560 Randolph Avenue - FCC Environmental Services Site Plan
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 May 2, 20 25 File Number 25-015-397

GROUND 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

☐ 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

Date 5/8/2025



West 7th / Fort Road Federation

395 Superior Street

Saint Paul, MN 55102

651.298.5599

www.FortRoadFederation.org

City Council Appeal: Site Plan for 560 Randolph Avenue

FILE # 25-015-397

Submitted by the West 7th / Fort Road Federation

The West 7th / Fort Road Federation opposes the proposed site plan for 560 Randolph Avenue because it represents a fundamental conflict with Saint Paul's long-term vision for this corridor. This plan would entrench an industrial waste hauling facility in a location explicitly identified by multiple city-adopted plans as a future site for mixed-use and residential redevelopment. The proposal undermines key policies in the 2040 Comprehensive Plan and its formally adopted addenda—including the Great River Passage Plan, the Mississippi River Corridor Plan, and the Fort Road Development Plan—all of which emphasize environmental stewardship, pedestrian-friendly design, equitable access to the Mississippi River, and vibrant neighborhood development.

This project would introduce heavy industrial traffic and environmental risks to one of the city's most sensitive and strategically located sites, jeopardizing its potential to serve as a river-oriented, transit-supportive neighborhood node. It fails to protect public access to the river, ignores critical infrastructure challenges, and imposes disproportionate burdens on a historically underserved neighborhood that is already overburdened by urban highways and industrial development such as the Xcel's High Bridge Energy Plant.

The public comment that follows is largely unaltered from what was submitted to the Planning Commission. The focus is on several key areas of concern, including the **inconsistency of this proposal with adopted city plans, the negative impact on neighborhood livability and future development potential, and the safety risks to pedestrians and cyclists**. We will also highlight especially **troubling issues related to sewage and stormwater management**, including insufficient information about how the facility will handle waste runoff, its potential impact on Fountain Cave, and the risk of contamination to the Mississippi River. These concerns underscore the need for far greater environmental diligence and reinforce why this site plan should not be approved.

Before we expand upon this information, we'd like to call attention to the 60-day zoning decision deadline of **May 28, 2025**. Through our previous appeal process for the Determination of Similar Use, we saw the mechanics of this timeline play out when Mayor Carter chose to veto the unanimous council decision to grant our appeal on the evening before the deadline. This decision followed public testimony and careful deliberation by the Council. Allowing FCC to proceed under the same rejected use classification, without a new statement of clarification due

to a timing issue, directly contradicts the Council's ruling and undermines public process. With the importance of procedural integrity in mind, we turn now to the current public hearing and Planning Commission approval process for the site plan.

First, we'd like to discuss the process of the public hearing and the Planning Commission approval process for the site plan.

In addition to our public comment submitted for the Zoning Committee public hearing, 11 people spoke and 25 letters were submitted. Community members echoed our concerns and expanded upon concerns related to traffic safety, the potential for growth at the site (up to 80 trucks), and effects from the CNG station (air pollution, noise, contamination). Upon closing of the public hearing, the Zoning Committee discussed the site plan for approximately three and a half minutes, making no mention of any of the Federation's or community's concerns. The number one condition to approve a site plan is consistency with the comprehensive plan. The Zoning Committee chose not to discuss this item. The bulk of the discussion focused around the improvements this site plan would bring, such as a partial sidewalk along Randolph Avenue. (The stretch of Randolph Avenue between West 7th and Shepard Road currently lacks sidewalks on both sides of the street and per city code, sidewalks would be required as part of the new site development).

At the Planning Commission meeting, the discussion was slightly longer but still failed to expand upon any of the community concerns or make any reference to comprehensive plans. There were limited questions around the mechanics of a CNG station from Commissioner Ortega, who stated he didn't remember a CNG station being a part of the first proposal that came before them (during the Determination of Similar Use process). Through both the public hearing and the Planning Commission meeting, the Planning Commission failed to discuss relevant factors in relation to the approval of the site plan. There was no consideration given to the points below and zero expansion upon community concerns. This gap in process is a serious error.

In order to approve the site plan, the planning commission shall consider and find that the site plan is consistent with eleven conditions. We've highlighted our top concerns below.

1. The city's adopted comprehensive plan and development or project plans for sub-areas of the city

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.

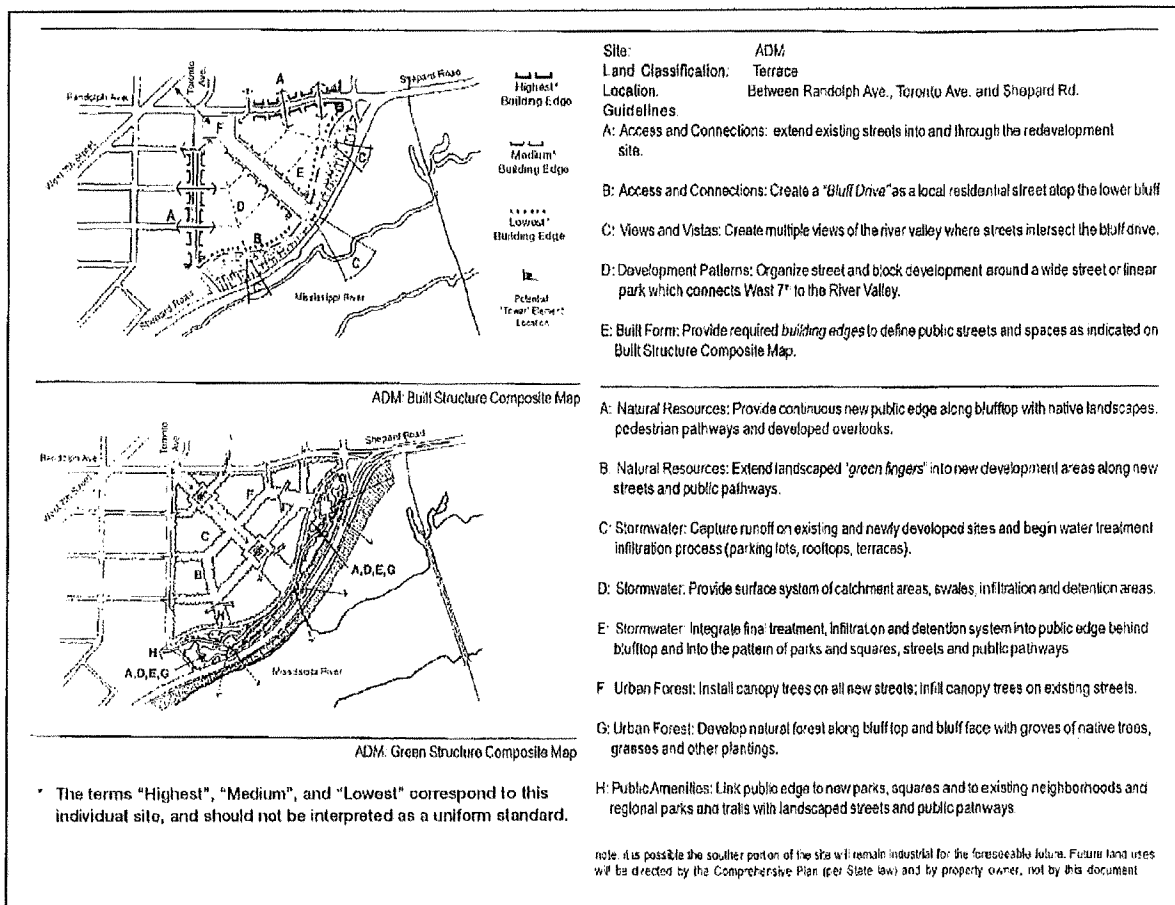


Figure 7: Mississippi River Corridor Plan vision for key redevelopment sites along the river.

Island Station Vision Plan

GOALS & OBJECTIVES

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

The peninsula 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 not-for-profit environmental and art organizations, including the National Park Service regional office, hotel, restaurants, shops and cafe. Offices can occupy upper floors, while industrial-scale artists' 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 ALM site will provide a major missing piece to provide public access to and along the river between downtown and the Valley View area. Greater connections between the peninsula and Shepard Road extend to the neighborhood and to the West 7th Street business district. Enhanced streetscapes support redevelopment opportunities and pedestrian friendly neighborhood expansion along Randolph Avenue.



Ice Climbing attracts outdoor enthusiasts in the winter.



Mountain Bikes support economic development and provide a desirable leisure activity.



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:*
 - (a) *Increase density toward the center of the node and transition in scale to surrounding land uses.*

- (b) 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.

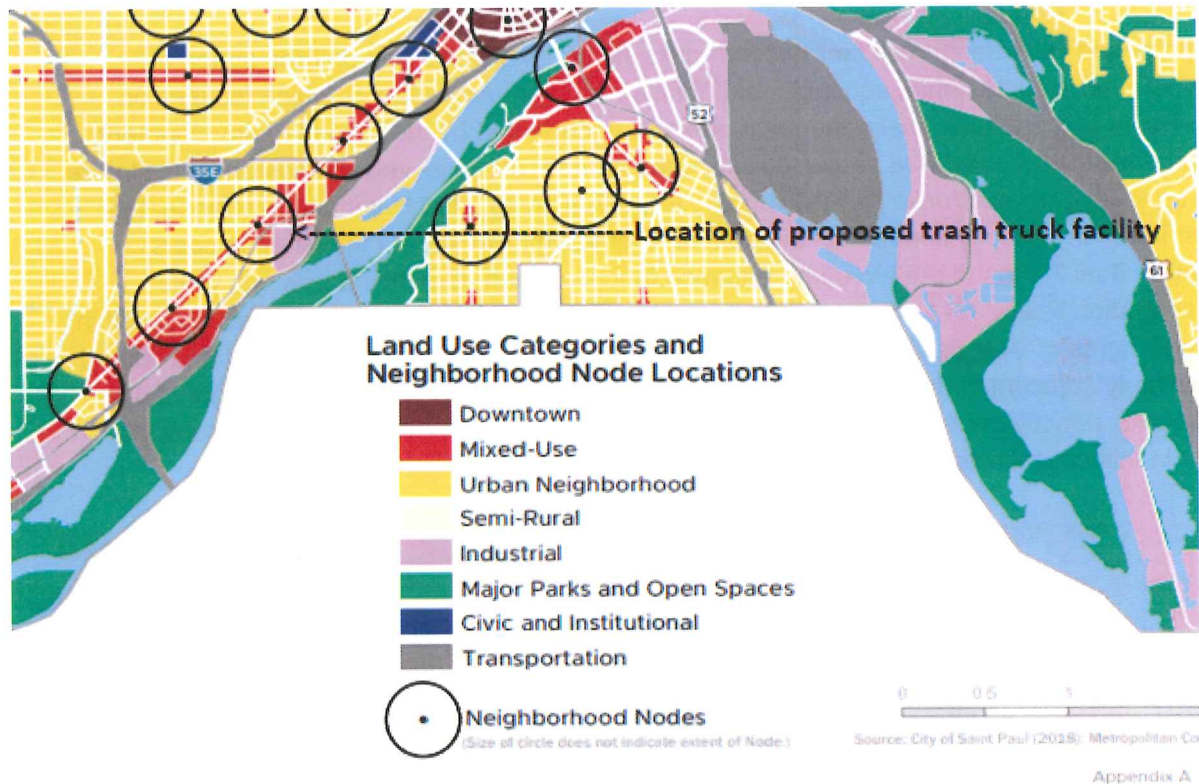


Figure 10: 2040 Comprehensive Plan map of neighborhood nodes and proposed FCC site

- 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.

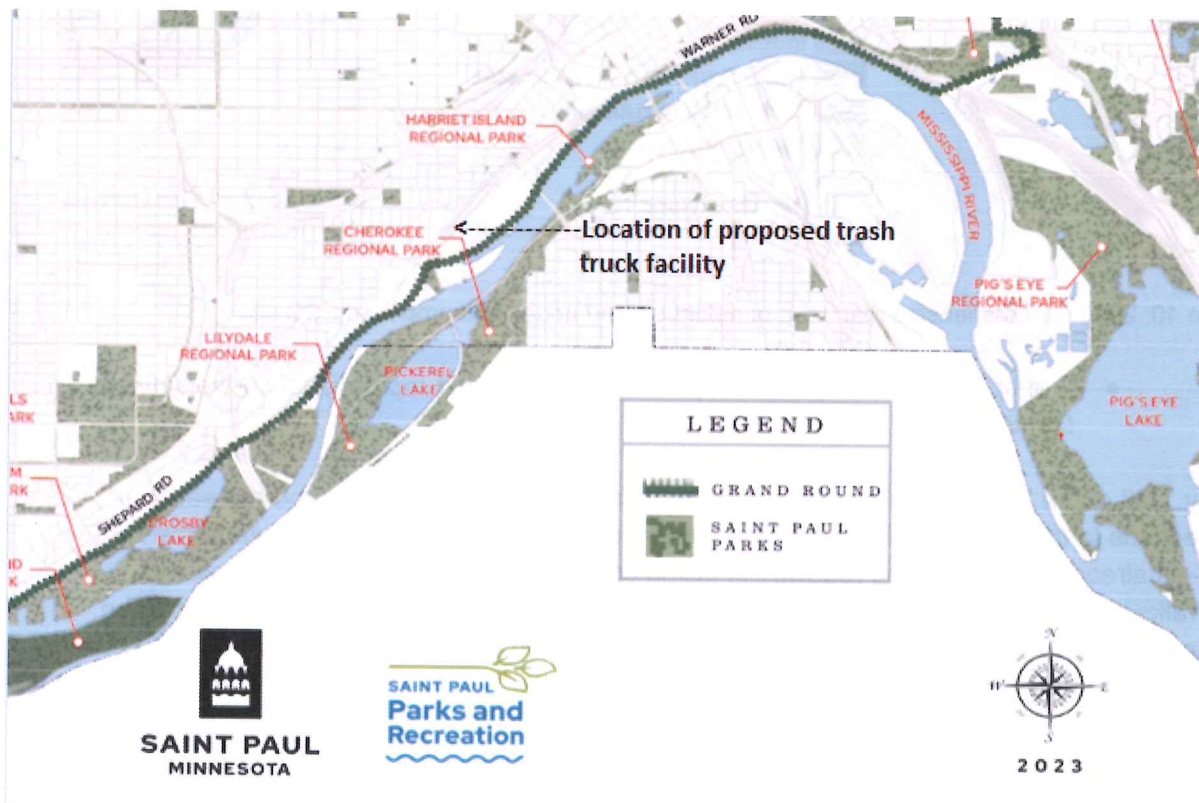


Figure 11: Map of the Grand Round scenic byway through St. Paul

- 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.

2. Applicable ordinances of the city

The proposed use at 560 Randolph does not meet the definition of a Public Works Yard or Maintenance Facility under Sec. 66.521 and is therefore not a permitted use in the I1 Light Industrial zoning district. On March 19, 2025, the Saint Paul City Council granted an appeal overturning the City's previous determination that FCC's proposed waste hauling facility was substantially similar to a public works yard. This decision followed public testimony and careful deliberation and made clear that FCC's operations are **not** comparable in character, function, or impact to a municipal facility. FCC is a private, for-profit waste hauler, not a city agency, and their site includes a private CNG fueling station—a significant industrial use not found at City facilities such as 891 Dale Street. That facility is publicly owned and operated, supports a wide range of city services, and does not include CNG fueling. 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 Planning Commission resolution states *“Furthermore, existing facilities such as the City of Saint Paul’s Public Works Yard at 891 Dale Street, serve as active examples of this use in an I1 Light Industrial zoning district, with spaces for employee offices, fueling equipment, fleet parking, and a maintenance garage. The operations at 891 Dale St provide essential public utility services to the residents of Saint Paul, mirroring the proposed use of the 560 Randolph Ave property by FCC Environmental Services”* This is incorrect as the Dale Street location does not have a CNG fueling station.

Allowing FCC to proceed under the same rejected use classification, without a new statement of clarification due to a timing issue, directly contradicts the Council’s ruling and undermines public process. The City must uphold its own ordinance and require a new determination of use before advancing this site plan. It is inadmissible for the City to accept a reassertion of the same use classification that was overturned through a public appeal. This action circumvents the formal zoning process including an opportunity for public input. The West 7th/Fort Road Federation urges the City Council to recognize this breach of process and to deny the site plan.

3. Preservation of unique geologic, geographic or historically significant characteristics of the city and environmentally sensitive areas.

The proposed development at 560 Randolph fails to meet the requirement to preserve unique geologic, geographic, and historically significant characteristics, as well as to protect environmentally sensitive areas. While this parcel may not carry a formal historic designation, multiple sources—including community members and local historians—have raised serious concerns that the site sits above or adjacent to Fountain Cave, a landmark of early Saint Paul history and one of the city’s most significant lost natural features. Fountain Cave was a central destination in early tourism and exploration of the Mississippi River and remains part of the city’s historical identity.

In addition, this property lies within the Mississippi River Critical Overlay District, a designation that calls for heightened environmental scrutiny due to the site’s proximity to the river and its impact on water quality and habitat. It has been reported that stormwater from this site drains directly into Fountain Cave and ultimately into the Mississippi River, with limited or no stormwater filtration or treatment.

The proposed use—a waste hauling depot—introduces a high volume of garbage trucks and industrial vehicles, which are known to carry pollutants such as oil, grease, brake dust, road salts, and leachate. These contaminants inevitably accumulate on site and are washed into the stormwater system during rain and snowmelt events. Without robust containment and treatment

systems, these substances are likely to reach the cave and river, posing a risk to groundwater, aquatic life, and downstream communities. This is especially concerning given the unique subsurface geology of the area, where karst formations and underground channels can rapidly carry pollutants long distances with minimal natural filtration.

In short, the combination of historic and geologic sensitivity, along with the risk of stormwater contamination in a Mississippi River Critical Area, demands far greater environmental diligence than this site plan reflects. The City should not approve the project without a full environmental review and clear evidence that these critical features will be identified, preserved, and protected.

4. Protection of adjacent and neighboring properties through reasonable provision for such matters as surface water drainage, sound and sight buffers, preservation of views, light and air, and those aspects of design which may have substantial effects on neighboring land uses.

While it may be true that compressed natural gas (CNG) trucks produce fewer emissions and less noise compared to traditional diesel vehicles, these relative improvements do not negate the fundamental issue: West 7th is being asked to accept a level of industrial activity that this site—and this corridor—has never seen before, solely to serve the city's broader waste collection needs. We did not previously have over 36 garbage trucks originating from a centralized facility in our neighborhood every day — regardless of their fuel type.

The staff report itself states that CNG trucks offer only a 20% reduction in greenhouse gas emissions compared to diesel, and it's important to note that not all of FCC's fleet is even CNG-powered. The claim of environmental benefit is therefore overstated. A slightly cleaner garbage truck is still a garbage truck, and 36 or more of them represent a major daily increase in heavy vehicle traffic. These trucks will navigate through residential and mixed-use parts of West 7th, where streets are already narrow, often poorly maintained, and lack basic pedestrian safety features. This raises serious concerns about pollution, traffic congestion, and safety—especially for children, cyclists, and transit users.

We have gotten a preview of FCC's operations at this site. Many drivers are using a "cut-through" through the historic brewery district on Webster Street. Residents don't have access to FCC Dispatch and GPS data that would show how many trucks are travelling by that route because FCC is a limited liability company not subject to provisions of the Minnesota Data Practices Act. If it was actually a public works yard, residents would be able to access such city data and with it could request a route change through an appeal to the Mayor or City Council.

Moreover, the facility is expected to generate additional employee traffic, further increasing the transportation burden on local roads. And for what long-term benefit? By siting a high-intensity waste facility at 560 Randolph, the City is not just adding short-term traffic and disruption—it is

locking in an industrial use that will stunt any future reinvestment or redevelopment along this key corridor. The presence of a large-scale garbage facility sends a clear signal to other property owners and potential developers: this is not a corridor for housing, mixed-use development, or neighborhood-scale retail. The opportunity cost is enormous—lost potential for housing density, walkable streets, business growth, and sustainable tax revenue for Saint Paul.

This proposal sacrifices the future of Randolph Avenue to solve a present-day problem, and in doing so, it burdens a historically underserved neighborhood with long-term negative impacts. West 7th is not a dumping ground for industrial solutions that other parts of the city would never accept. To frame this as a climate-forward investment while ignoring its inequitable siting and harmful land use consequences is disingenuous.

7. Safety and convenience of both vehicular and pedestrian traffic both within the site and in relation to access streets, including traffic circulation features, the locations and design of entrances and exits and parking areas within the site.

While the staff report emphasizes technical compliance with site plan requirements and traffic engineering standards, it misses a crucial point: Randolph Avenue is far more than a collector road. For the West 7th community, it is the only direct access to the Mississippi River for the majority of our community— a cherished public resource and a defining feature of our neighborhood.

Critically, this gateway is already functioning without adequate safety infrastructure. There is currently no sidewalk and no designated biking infrastructure along this stretch of Randolph — yet residents use it daily to access the river, Crosby Farm Regional Park, and adjacent trails. Neighbors utilize this dangerous roadway because there simply are no alternatives.

Adding a fleet of 36+ garbage trucks and dozens of employee vehicles to this corridor — entering and exiting the site during peak morning and afternoon hours — will only magnify the risks for those who rely on Randolph for non-motorized transportation. The site plan's modest proposal for infill sidewalk on one parcel does not resolve this deeper issue, nor does it address the need for safe, continuous multimodal connections along the corridor.

This isn't just about turning radii or curb cuts — it's about preserving and enhancing a critical community gateway that connects people to nature, recreation, and the river. Unlike Dale or Burgess Streets, which serve larger industrial zones with fewer residential impacts, Randolph Avenue passes directly through a mixed-use neighborhood already under strain from traffic, poor street conditions, and a lack of pedestrian safety measures.

A facility of this scale — serving the entire city's waste needs — belongs in an area already zoned and equipped to handle high-intensity, industrial traffic. It should not be sited at the expense of one of the West 7th community's most important, yet vulnerable, public connections.

8. The satisfactory availability and capacity of storm and sanitary sewers, including solutions to any drainage problems in the area of the development

In email correspondence between a community member and the Civil Engineer for FCC, Mr. Knaeble notes they could not find a sanitary sewer connection from the building and indicates the building drains into a drain field (*April 7, 2025*). St. Paul City code seems to prohibit discharge of commercial sewage into drain fields.

Initial FCC public submittals and statements did address the amount of sanitary sewage water that will be discharged from washing the 30 refuse trucks presently in operation at 560 Randolph Ave, or in providing for their employee restrooms. From research, it would appear that a former sanitary sewer connection to the Met Council Environmental Services (MCES) W. 7th St. interceptor line that runs underground below the property was abandoned. More research is needed and more details need to be provided.

The **Minnesota Pollution Control Agency** has indicated their agency is opening an **investigation** into potential contamination at the 560 Randolph site due to years of industrial waste draining untreated and unrestricted into the river. The Planning Commission was notified of this investigation being opened but yet failed to discuss this issue.

11. Provision for erosion and sediment control as specified in the Minnesota Pollution Control Agency's "Manual for Protecting Water Quality in Urban Areas"

The proposed site plan fails to adequately address erosion and sediment control, particularly in light of the significant environmental risks posed by the location. According to the Minnesota Pollution Control Agency's "Manual for Protecting Water Quality in Urban Areas," effective erosion and sediment control measures are essential to prevent harmful runoff from reaching nearby water sources. However, the plan fails to provide meaningful stormwater management solutions, particularly given that the stormwater at this site is proposed to drain directly into Fountain Cave and the Mississippi River with limited management.

Fountain Cave, a historically significant geologic feature in Saint Paul, is part of the same watershed as the Mississippi River, and stormwater runoff that reaches this cave carries contaminants that could directly pollute the river. Given that part of this area is already within the

Mississippi Critical Overlay District, any development that increases impervious surfaces without robust stormwater management exacerbates the risk of pollution. The addition of multiple acres of asphalt from surface parking and fleet storage significantly worsens the runoff problem, increasing the amount of sediment and pollutants entering the stormwater system.

This site's design and proposed operations, including daily truck traffic and fleet movements, will further contribute to the accumulation of contaminants in the stormwater runoff. Garbage trucks, in particular, bring debris and pollutants that are carried by the runoff into the cave and eventually the river, which is unacceptable from an environmental perspective. While the erosion and sediment control requirements outlined in the city's guidelines may be technically met, the lack of meaningful stormwater management that adequately mitigates the contamination risks to the river, cave, and surrounding environment highlights a critical gap in the proposed plan.

To meet both the letter and spirit of the criteria, the city must require far more comprehensive stormwater management strategies that address the long-term environmental health of the Mississippi River, reduce pollutants entering the watershed, and protect sensitive geologic features like Fountain Cave from further degradation.

Conclusion

The proposed site plan for 560 Randolph Avenue fails to meet multiple core criteria under Saint Paul's site plan review ordinance and directly contradicts the city's own adopted planning documents. It would entrench an incompatible industrial use in a location long identified for mixed-use and residential redevelopment, undermining the city's goals for environmental stewardship, neighborhood connectivity, and equitable river access. The plan disregards the intent and guidance of the 2040 Comprehensive Plan and its key addenda, while introducing significant safety, environmental quality, livability, and infrastructure concerns.

In particular, the absence of clear, compliant plans for sanitary sewage disposal, and the inadequate attention to stormwater management in a Mississippi River Critical Overlay District, raise serious environmental and public health risks. With the MPCA opening an investigation related to contamination at this site, we need to understand how to move forward with remediation without further contamination. These unresolved issues alone warrant a more thorough environmental review—and further highlight the inappropriateness of siting a high-intensity waste facility in this location.

This site plan does not reflect the values, priorities, or vision the city has committed to through years of planning and community engagement. 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.

The Planning Commission erred in their process to approve the site plan. There was a lack of thoughtful consideration given to the conditions needed to meet the site plan and no community concerns were expanded upon or addressed.

We urge the City Council to grant our appeal and **deny the site plan**. Reaffirm the commitment to long-term, sustainable, and community-centered development in the West 7th neighborhood and throughout Saint Paul.

Sincerely,



Meg Duhr
Board President
West 7th/Fort Road Federation



Julia McColley
Executive Director
West 7th/Fort Road Federation