

From: [Victoria Downey](#)
To: [*CI-StPaul>Contact-Council](#)
Subject: Comment for 43 RLH SAO 23-26
Date: Wednesday, July 26, 2023 12:02:26 PM

Hello,

I will unfortunately not be able to make the City Council Meeting this afternoon after all, so I would like to submit my public comment via email (see below). This is regarding Appeal of Victoria Downey to a Summary Abatement Order at 761 HOWELL STREET NORTH.

Thank you,
Victoria Downey

Comment: I installed my raised beds during the pandemic in 2020 and checked the city's website regarding boulevard plantings prior to doing so. The website says nothing about raised beds being prohibited, only that plantings should not exceed 36" in height. As such, I was surprised to be cited this summer for having them. Boulevard soils have the potential for contamination due to proximity to the road, and both the Minnesota Department of Health and the EPA recommend that if contamination is a concern, raised beds should be used. This is particularly of concern if edible plants are being placed in the boulevard, which is something that our code currently allows. If we are a city that pretends to care about sustainability then we should be allowing these. The St. Paul Climate Action Resiliency Plan includes, under Economic and Social Well Being: "Encourage equitable spatial distribution of community assets to improve food security, including urban farms, community gardens, food markets and healthy food options." Additionally, raised beds are less disruptive to boulevard trees, which are of course city owned, and boulevard plantings encourage biodiversity, something that a monoculture of turf grass does not. I fully expect to lose my appeal today, but if my appealing this moves us closer to allowing this safer, more sustainable option for all residents (not just me), I will consider that a win.

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Victoria S. Downey
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