ZONING COMMITTEE STAFF REPORT

1. **FILE NAME:** Site Plan Review for FCC Environmental Site Improvements **FILE #** 25-015-397

2. **APPLICANT:** Civil Site Group **HEARING DATE:** April 24, 2025

3. **TYPE OF APPLICATION:** Site Plan Review

4. **LOCATION:** 560 Randolph Ave

5. **PIN & LEGAL DESCRIPTION:** 122823320016 Section 12 Town 28 Range 23 A 24,300 Mol Sq Ft Lease Located On ...Govt Lot 4 In Sec 12 Tn 28 Rn 23

6. **PLANNING DISTRICT:** 9 – West 7th/Fort Road Federation **PRESENT ZONING:** I1, RC4

7. **ZONING CODE REFERENCE:** §61.402(c)

8. **STAFF REPORT DATE:** April 14, 2025 **BY:** Tia Anderson

9. **DATE RECEIVED:** Jan 28, 2025 **DECISION DEADLINE: 05/28/25**

A. **PURPOSE:** Site plan review for a public works yard or maintenance facility including a compressed natural gas garbage truck filling facility, truck fleet storage, and off-street parking.

B. **PARCEL SIZE:** 4.706 acres, ~ 204,972 sq ft

C. **EXISTING LAND USE:** Towing and accessory storage, office building to support related operations, and off-street parking. (I1 light industrial district, RC4 River Corridor Overlay)

D. **SURROUNDING LAND USE:**
North: Vacant land (T2), industrial uses (IT)
East: Railroad company (I1)
South: Railroad company (I1)
West: Industrial uses (I1)

E. **ZONING CODE CITATION:** § 61.402(c) Findings for site plan review.

F. **HISTORY/DISCUSSION:**

A Site Plan Review (SPR) Application was received by the Zoning Administrator on January 28, 2025 (SPR File #25-008-212). The applicant reviewed and discussed the site plan with the cross-department Site Plan Review Committee and received feedback on February 21, 2025 (see attached SPR Staff Comments Report). Based on staff's iterative feedback (see attached SPR Staff Comments and Responses) an updated Site Plan file was received for a public hearing and decision by the Planning Commission.

On March 24, 2025, FCC Environmental Services (FCC) provided additional information of their operations and indicated they are applying for Site Plan Review as a *public works yard or maintenance facility*, which is a permitted use in the I1 Light Industrial zoning district. Given there is no zoning definition for *public works yard or maintenance facility*, the zoning code indicates in Leg. Code Sec. 65.001. - Land use definitions and development standards. "they shall have ascribed to them their ordinarily accepted meanings and/or such as the context herein may imply." The description provided

by FCC for their proposed use aligns with ordinarily accepted meaning for a *public works yard or maintenance facility*: a space used to store, maintain, repair equipment, vehicles, materials, tools necessary for public services, the building and maintenance of public infrastructure and the public right of way whether operated by a municipality or under contract. It includes but not limited to activities in MN statutes 440-446A, for road repairs, snow and winter maintenance operations, street lighting, traffic signaling, municipal water, storm/sanitary sewer systems, parks maintenance, solid waste management and related administrative functions. Physical space includes areas for vehicle storage, maintenance shops, material warehouses, and fueling stations. These facilities often house staff offices, breakrooms, and other amenities for operational employees.

The additional information provided by FCC regarding their land use on March 24, 2025, supports the conclusion that the proposed use is, in fact, listed in the Zoning Code.

Previously, on December 16, 2024, FCC applied for a Statement of Clarification regarding the land use. As authorized by Leg. Code Sec. 61.106, the Zoning Administrator approved a Statement of Clarification based on required findings that the use was operationally similar to a *public works yard or maintenance facility*. The Zoning Administrator's decision was appealed to the Planning Commission by the West 7th/Fort Road Federation district council, whose unanimous decision was in turn appealed to the City Council. The City Council granted the appeal and overturned the Planning Commission's decision on March 19, 2025.

Site Plan Review staff thoroughly evaluated the submitted site plan for technical compliance. As part of this review, all City departments' review staff signed-off on the site plan, including department representatives from Safety and Inspections (including Fire Safety, Plumbing, Water Resources and Zoning), Planning, Parks Forestry, St. Paul Regional Water, and Public Works (including Transportation Planning and Safety, Streets and Construction, Traffic Engineering, and Sewers). Ramsey County Public Works also reviewed and consulted with City staff on the site plan.

G. **DISTRICT COUNCIL RECOMMENDATION:** West 7th/Fort Road Federation hosted several community meetings to discuss the proposed facility at 560 Randolph Ave, including providing feedback on the previous Statement of Clarification. As of April 14, 2025, a formal recommendation regarding the site plan application has not been received.

H. **FINDINGS:**

Zoning Code § 61.402(c) states that in "order to approve the site plan, the planning commission shall consider and find that the site plan is consistent with" the eleven findings listed below. In accordance with this requirement, the Zoning Administrator, in consultation with the cross-department Site Plan Review Committee, thoroughly reviewed the proposed site plan and found it to be consistent with the listed findings. The site plan meets the necessary criteria for approval.

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

   The site plan meets this finding. The 2040 Saint Paul Comprehensive Plan (Comp Plan) designates the future land use of the site as Industrial, which aligns with the site's current I1 Light Industrial zoning. This zoning is consistent with the future land use designation outlined in the Comprehensive Plan.

   While four of the Comprehensive Plan's addenda that address this site foresee residential as a

possible long-term use, two of these plans—namely the Brewery/Ran-View Plan Summary and the Great River Passage Master Plan—recognize that industrial uses will remain for the foreseeable future. The Great River Passage Master Plan specifically focuses on transforming vacant and brownfield sites, rather than active industrial properties. Similarly, the Brewery/Ran-View Plan Summary states, "Pending the clean-up of the site, interim uses consistent with the current zoning of the property will be permitted." Notably, the zoning study associated with the Brewery/Ran-View Plan Summary left the subject site zoned for industrial use. Considering the timeline and context, the continuation of industrial uses on this site is consistent with both the Brewery/Ran-View Plan Summary and the Great River Passage Master Plan.

The Fort Road Development Plan and the District 9 Area Plan Summary both call for residential uses on the site. However, unlike other area plans, these do not include specific timeline caveats as in the other area plans. The Fort Road Development Plan does not actively call for an immediate change in land use but outlines guiding principles for potential residential redevelopment should it occur in the future.

The zoning study to implement the Fort Road Development Plan rezoned the subject site from one industrial district to another; it notably did not rezone the site to residential.

The Mississippi River Corridor Plan, adopted as a Comprehensive Plan chapter, identifies the site for further study without a firm land use outcome.

As the most recently adopted policy document, the 2040 Saint Paul Comprehensive Plan takes precedence over smaller area plans in the case of conflicts. This is reinforced by the Minnesota Court of Appeals ruling in Rel. Neighbors for East Bank Livability v. City of Minneapolis (915 N.W.2d 505, 511, Minn. App. 2018), which affirmed that the 2040 Comprehensive Plan prevails over conflicting small-area plans.

2. Applicable ordinances of the City of Saint Paul.

The site plan meets this finding. The proposed use as a *Public Works Yard or Maintenance Facility* as defined under Sec. 66.521, is a permitted use in an I1 Light Industrial zoning district. The plain and ordinarily accepted meaning of a *Public Works Yard or Maintenance Facility* is a space used to store, maintain, repair equipment, vehicles, materials, tools necessary for public services, the building and maintenance of public infrastructure and the public right of way. It includes areas for vehicle storage, maintenance shops, material warehouses, and fueling stations. These facilities often house staff offices, breakrooms, and other amenities for operational employees.

This type of facility is designed to support municipal public works operations, whether conducted by a municipality or under contract, as outlined in Minnesota Statutes Chapters 440-446A. These services may encompass road repairs, winter maintenance, street lighting, traffic signaling, signage, municipal water systems, storm/sanitary sewer systems, parks maintenance, and solid waste management, in addition to the administrative functions tied to these public works services.

The proposed facility's services and site plan application aligns with ordinarily accepted meaning of the functions of a *Public Works Yard or Maintenance Facility*. 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.

The proposed site improvements align with the I1 Light Industrial zoning district and the RC4 River Corridor Overlay. The proposed site improvements, including off-street parking, outdoor fleet vehicle storage, and compressed natural gas (CNG) fueling area complies with Zoning Code requirements including outdoor storage design standards as well as off-street parking design and dimensional standards.

The proposed site plan complies with zoning design standards, including careful attention to outdoor storage screening, front yard landscaping, new in-fill public sidewalk and boulevard trees, and vehicle access.

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

The site plan meets this finding. The proposed site plan is consistent with the character of I1 Light Industrial zoning district, which permits a diverse range of uses, both by right and conditionally. For the portion of the property located within the RC4 Overlay District, the land use will adhere to the specified uses and standards of the corresponding underlying I1 Light Industrial district.

This property is not located within a heritage preservation district nor is it designated as having geologic or historical significance.

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.***

The site plan meets this finding. The effect of the proposed outdoor fleet vehicle fueling and storage and off-street parking on adjacent and neighboring properties is reasonable. Zoning standards specific to the findings:

- **Stormwater runoff** from the project site will be improved by best management practices (BMPs) to meet MPCA and CRWD water quality treatment requirements and City's stormwater run-off rate control. The system will consist of an underground detention system located under the off-street parking facility and connect to the City's storm sewer.
- **Setback** of parking areas from Randolph Ave will significantly exceed the minimum 4-foot setback requirement for off-street parking, buffering abutting properties from the facility.
- **Design Standards** for off-street parking and outdoor storage comply with the zoning code including such elements as:
  - Perimeter and interior landscaping and tree planting requirements
  - Screening along Randolph Ave by a 6-foot-tall decorative, obscuring fence
  - Lighting that will be shielded to minimize glare and arranged to meet standards for light spill-over standards.
- **Height** of the proposed 20-foot tall CNG fueling truss structure is below the 50-foot maximum height allowed in the zoning district.
- **Driveway** curb-cuts will be consolidated to a single driveway on Randolph Ave. providing access for off-street vehicular and bicycle parking and fleet truck storage.

Another consideration is that compressed natural gas (CNG) trucks emit less air pollution, are quieter, and more environmentally friendly than traditional diesel-powered trucks. CNG trucks can reduce greenhouse gas emissions by up to 20%. They contribute to improved air quality by

emitting lower levels of nitrogen oxides (NOx) and particulate matter. In addition to the environmental benefits, CNG trucks are much quieter than their diesel counterparts. These vehicles operate approximately 10 decibels quieter than diesel trucks, significantly reducing noise pollution in the area, resulting in a less disruptive environment. In further effort towards sustainability, three of the vehicles at the facility (two supervisor trucks and a bulky item collection vehicle) are electric, generating zero tailpipe emissions and offering additional benefits to both air quality and noise reduction.

Beyond the scope of site plan review, the compressed natural gas (CNG) operations shall be conducted, operated and maintained in accordance with any necessary permits of the state pollution control agency, the county and the city.

5. ***The arrangement of buildings, uses and facilities of the proposed development in order to assure abutting property and/or its occupants will not be unreasonably affected.***

   The site plan meets this finding. The effect of the specific site improvements on abutting properties, including off-street parking, vehicle dispatch, fleet maintenance, and compressed natural gas (CNG) fueling area is reasonable. The parking and storage areas will be paved, creating a durable dustless surface for vehicles. The proposed fleet vehicle storage and off-street parking location exceeds the minimum setbacks. The proposed boulevard trees and six-foot tall, decorative, obscuring fence, and site landscaping along the Randolph Ave property line provides an extensive visual buffer.

   Lighting is proposed in compliance with zoning code requirements that all parking facilities, including bicycle parking, shall be illuminated to a level to allow safe, secure access to the parking facility and within it. Additionally, outdoor lighting, including off-street parking facilities, shall be shielded to reduce glare and shall be so arranged as to reflect lights away from all adjacent residential districts or adjacent residences.

   Stormwater runoff from the property will be improved through best management practices (BMPs). An underground detention system located under the off-street parking facility will manage run-off rate control and improve the quality of stormwater run-off from the site.

6. ***Creation of energy-conserving design through landscaping and location, orientation and elevation of structures.***

   The site plan meets this finding. The design of the parking facility and fleet storage areas complies with Zoning Code requirements, addressing screening, setbacks, landscaping, and stormwater management. In addition to boulevard trees, the Landscape Plan and planting schedule includes more than 20 deciduous trees and ornamental trees, plus shrubs and grasses adjoining the surface parking lot. The Landscape Plan indicates over 1.5 acres to be planted with MnDOT seed mixes or sod.

   The existing buildings will remain and are outside the scope of this site plan review. The proposed Site Plan does not include any building removal, addition or exterior renovations that would trigger a zoning review.

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.***

The site plan meets this finding. Existing driveways will be consolidated and appropriately sized for the fleet vehicles. The proposed facility is located interior to FCC's 4-acre property and accessed off a collector street, which is Ramsey Co right-of-way. Multi-modal transportation is supported with new in-fill public sidewalk along the property line, 75 off-street parking spaces, 4 bicycle parking spaces, and public transit on nearby 7th Street W. Vehicle turning movements for fleet vehicles and emergency vehicles were reviewed by the Public Works Traffic Engineering Division and DSI's Fire Safety Division.

Site Plan review is primarily focused on the physical aspects of a development, including vehicular movement and off-street parking design, pedestrian connections, and infrastructure improvements. Through the Site Plan review process with staff, Public Works and Ramsey County refined site improvements to enhance pedestrian safety including boulevard expansion and location of new sidewalk within the right-of-way including a section that will adjoin the existing guardrail and retaining wall. Consolidated use of only one driveway on Randolph allows for elimination of the existing curb cut at the northeastern end of the site.

A Transportation Study prepared by Transportation Collaborative & Consultants, LLC and reviewed by Public Works staff assessed the traffic impact of FCC's operations. The study offered considerations to the project and summarized that "the proposed site plan does not indicate any significant issues with respect to access, circulation, or parking." The site plan layout is designed to support a fleet of 30 CNG garbage trucks, 5 other trash collection trucks and 4 shop vehicles in addition to 75 employee passenger parking spaces. FCC's solid waste hauler license includes 24 CNG trucks and 10 F-600 diesel mini-packer trucks operating at the time of opening.

Based on the Transportation Study, at peak operational times, it is expected that approximately 65 truck drivers and employees will report for work between 6:00 and 6:30 a.m., with formal work commencing at 6:30 a.m. A majority of the fleet will have two employees assigned to each vehicle. The CNG and mini-packer trucks will typically leave the facility around 6:50 a.m. after completing the necessary pre-trip inspections.

Each truck is scheduled to work an eight (8) to ten (10) hour shift, with a return to the facility anticipated between 3:00 and 5:00 p.m. Throughout the day, trucks will not return to the facility except in cases of mechanical issues or staff requirements.

For traffic comparison purposes, Saint Paul Public Works has three sites in an I1 Zoning District with employee passenger vehicle parking and public works truck storage:

City of Saint Paul Public Works Daily Average Vehicle Trips			
Location	**Passenger***	**PW Truck**	**Total Vehicle Trips**
Dale	426	115	541
Burgess	133	75	208
Sycamore	33	13	46

In contrast, the public works facility located on Dale Street, the largest of the three sites, averages approximately 541 vehicle trips per day. This difference highlights the Randolph Avenue facility's lesser impact in the surrounding area compared to the traffic generated by the public works facility on Dale Street.

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

The site plan meets this finding. The availability and capacity of both storm and sanitary sewers in the area are deemed satisfactory. As indicated on the Utility Plans, the storm and sanitary services will be connected to the existing infrastructure along Randolph Avenue. To manage stormwater runoff from the project site, best management practices (BMPs) will be implemented to comply with the treatment requirements set by the Minnesota Pollution Control Agency (MPCA) and the Capital Region Watershed District. Additionally, the City's stormwater runoff rate control requirements will be fully met.

9. Sufficient landscaping, fences, walls and parking necessary to meet the above objectives.

The site plan meets this finding. The Landscape Plan, as signed-off by the City Forester and DSI Zoning, complies with applicable landscaping requirements. All required yards and any underdeveloped space shall be landscaped using materials such as trees, shrubs, sod, groundcover plants, or stormwater landscaping. Additional boulevard trees will be planted as required.

The proposed boulevard trees and six-foot tall, decorative, obscuring fence along the Randolph Ave property line serves to screen the outdoor storage per Leg. Code Sec. 66.541. - Required conditions in industrial districts. (a)(2) Outdoor storage shall be fenced or walled. Outdoor storage which abuts a thoroughfare…shall be behind a six-foot-high obscuring fence and comply with Leg. Code Sec. 66.543. - Required design standards in the 1I light industrial district: (6) Landscaping shall be provided along the public streets and sidewalks to define the street edge, buffer pedestrians from vehicles, and provide shade. Any fence along a public street and sidewalk shall be decorative. Street trees in the street right-of-way, as prescribed by the city forester… shall be provided along all streets.

Bicycle parking will be provided in a safe and secure area near the building. No off-street parking is required per the Zoning Code. However, the applicant is proposing 75 surface off-street parking spaces, including 16 electric-vehicle ready spaces and 3 ADA spaces.

10. Site accessibility in accordance with the provisions of the Americans with Disabilities Act (ADA), including parking spaces, passenger loading zones and accessible routes.

The site plan meets this finding. Accessible parking will be provided to meet ADA standards.

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 site plan meets this finding. The site plan complies with the City of Saint Paul's stormwater rate control requirements and the Stormwater Pollution Prevention Plan (SWPPP) meets erosion and sediment control standards. The proposed facility shall meet the Capitol Region Watershed District's water quality standards and the National Pollutant Discharge Elimination System (NPDES) permit requirements administered by the Minnesota Pollution Control Agency (MPCA). A permit from Capitol Region Watershed District shall be obtained prior to issuance of a building permit for the site improvements.

I. CONCLUSION AND STAFF RECOMMENDATION:

The site plan for the proposed *public works yard or maintenance facility* complies with zoning code standards and conditions.

Based on the findings above, the staff recommends approval of the site plan for a compressed natural gas garbage truck filling facility, truck fleet storage, and off-street parking at 560 Randolph Avenue with the following conditions:

1. Sign-off by Site Plan Review staff for technical compliance of the Site Plan final construction set and supporting documentation.
2. A permit from Capitol Region Watershed District shall be obtained prior to building permit issuance.