

NEIGHBORS AGAINST CORPORATE SUBSIDIES

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June 13, 2016

Barbara Wencil, Chair
St. Paul Planning Commission
1400 City Hall Annex
25 Fourth Street West
Saint Paul MN 55102

Dear Chair Wencil and fellow Commissioners:

As I noted in my testimony before the Planning Commission on Friday, I believe that consideration of the proposed Snelling-Midway master plan, soccer stadium site plan, and zoning clarification amendment is premature and that the entire planning process has been driven by politics and arbitrary deadlines rather than by sound planning principles. Not only has your own commission staff declined to make a recommendation at this time because “further development of plans is required,” a June 3rd letter from MnDOT indicates the need for a traffic impact study and the possibility of a MnDOT Layout Review. In addition, only preliminary testing of soil samples has been conducted to evaluate the extent of pollution at the site.

Although the city has held several open houses, public comment was only permitted at two of those events, and even then it was limited to approximately 15 minutes each time. While the CAC Task Force held several meetings from December through May, members of the public were not allowed to comment on any of the presentations or discussions that took place there. And the City Council allowed just 15 minutes of testimony prior to voting approval on March 2nd of \$18.4 million in infrastructure funding for the stadium—meaning the city has devoted less than an hour to public input on this enormously consequential development.

More importantly, concerns raised about traffic, parking, noise, size and scope of the stadium, lack of job creation, etc., have not been adequately addressed by the city—nor has the city obtained binding commitments (from the principals involved in designing and building the stadium) that anything beyond a soccer stadium and some adjoining green space will be constructed on the Midway Superblock site. Any developer can promise to build something “depending on market conditions,” and in the case of RK Midway, market conditions have allowed for the ongoing neglect of the Midway Shopping Center for the past 15 years. Assurances without financial commitments and enforceable development agreements are meaningless.

In the pages that follow, I have outlined the more salient points of concern that I don’t believe could be adequately conveyed in my three minutes of testimony on Friday. Thank you for your consideration of my comments.

Sincerely,

Tom Goldstein
Founder
Neighbors Against Corporate Subsidies

WHY THE PROPOSED SOCCER STADIUM SITE PLAN SHOULD NOT BE APPROVED

1. The project fails the City Council's own test for economic viability

On August 26, 2015, the St. Paul City Council passed a resolution in support of a tax exemption at the Midway site and a “fair, sensible plan...for the construction of needed public infrastructure around the site” *so long as* the “City has *strong, specific evidence* that the stadium and public infrastructure investments will help catalyze additional investments on the Midway Shopping Center site consistent with the Snelling Station Area Plan.” In fact, the city has no such evidence.

Economists who have been studying the stadium boom for the past thirty years have found that stadiums do not generate ancillary development beyond the bars and restaurants that sometimes spring up around them. At most, stadiums simply shift spending patterns within a community. Neither the city nor the team has produced any evidence to the contrary, and it is incumbent upon the promoters of this project to demonstrate that the City Council's requirements have been met. While the master plan may envision a hotel, high-rise office buildings, movie theaters, housing, etc., absent any financial commitments or developer agreements, such renderings are mere speculation—they don't come close to “strong, specific evidence” that anything will be built other than a soccer stadium.

2. The stadium violates the Master Plan

The Snelling Area Plan and previous iterations of a the Master Plan have always focused on breaking up the monolithic Midway Shopping Center strip mall and establishing a street and block grid on the Midway Superblock site. At no point was a stadium or similar outdoor entertainment venue contemplated because it was not compatible with the plan—hence the need for an amendment to make such a use allowable within the permitted zoning for this area.

A stadium that will occupy nearly a quarter of the Superblock site will completely disrupt the proposed street and block grid—and the footprint of the stadium will likely exceed the overall size of the very strip mall that the city wants to eliminate. As PED Director Jonathan Sage-Martinson noted in his testimony, many years of careful planning went into the development of the Snelling Station Area Plan. Why would the city throw all that planning away in favor of a suburban style building that will dominate the site?

Worse than that, stadiums usually serve as a disincentive for surrounding development. In fact, in its application to the Federal Transit Administration for a joint-development project on this site, the Metropolitan Council wrote “if the development proceeds as planned, this may be one of the rare examples of a sports facility delivering significant economic development benefits...” Rare indeed, particularly when there is nothing but vague assurances that related development will occur.

3. The Alternative Urban Areawide Review (AUAR) is not credible.

A careful reading of the AUAR shows numerous assumptions being made using generalities rather than legitimate analysis based on specific data. This is particularly true with regards to traffic and parking issues, where the authors conclude that as many as 70 percent of soccer fans will use alternative transit options to attend games—even though “Metro Transit says that (only) about 14 percent of baseball fans take public transit to Twins games and about 13 percent of Gophers football fans take mass transit to TCF Bank Stadium at the University of Minnesota.”

How did Stantec get to the 70 percent figure? By claiming that the *mere available capacity* of alternative transit modes—light rail, bus rapid transit, park and ride shuttles—is evidence that soccer fans will in fact use those alternative modalities. That’s not even close to science; it’s just speculation.

Interestingly, Minnesota United Owner Bill McGuire claimed that nearly 80 percent of soccer fans in Portland and New York used public transportation to attend games. If those numbers are accurate, why wasn’t that information included in the AUAR? Simply put, consultants and city staff can’t pretend to do an accurate analysis when the effort is rushed in order to meet an arbitrary deadline established by Major League Soccer to ensure its proposed franchisee gets the necessary approvals for the stadium it desires to build.

More troubling about the so-called “traffic study” is that it appears the report’s authors did not interview the one demographic that matters: the current fans of the team. Without knowing where those people live and how they would plan to travel to games, any purported studies are simply best guesses. Although I have requested on two occasions that the team provide this data, they have refused. Is that because such data will show that the majority of the fan base resides in the suburbs and thus will more than likely drive to games? We don’t know, and apparently neither do the authors of this report.

Even if one could persuade soccer fans to use park and ride lots like those at the State Fairgrounds, if 2,000 cars all converge on a parking lot to claim their assigned parking space, that will still lead to significant traffic jams—as borne out at stadiums that already have "reserved" parking spots for certain season ticket holders. If the city can find hundreds of neighborhood lots or businesses to participate in the plan, that might address parking concerns—but if people didn't mind paying for parking, why would they take the time driving around neighborhoods looking for a free spot and clogging up the streets? I'm aware of no other place where this scheme has been tried or been successful, and little information has been gathered that would lead one to conclude that such a plan would be workable for soccer games in the Midway.

4. Who really benefits?

(Please see attached op-ed piece from the Pioneer Press. One key beneficiary will be R.K. Midway, which as a result of the city’s use agreement with the team will gain access to 1.5 acres of prime real estate at the edge of Snelling and St. Anthony—cleaned up at taxpayer expense. Not only does this grant valuable development rights to an absentee landlord for the next 52 years, it removes any leverage the city might have had to force long overdue improvements to a shopping center where the parking lot has been crumbling for a decade and litter is everywhere. In contrast, Wal-Mart resurfaced its parking lot last year and Target just last week. RK Midway has not resurfaced and re-striped its parking lot in fifteen years—and the design of the lot is the worst to be found anywhere in the area.)

5. No Meaningful Public Process

As noted in my cover letter, public comment at the city’s open houses has been limited to approximately 15 minutes at just two of these events—both of which were held *after* the City Council had already voted on March 2, 2016 to approve \$18.4 million in public infrastructure around the stadium. And that decision itself was made after just 15 minutes of testimony. If the city is not going to take seriously the public interest when pursuing such a major redevelopment, the Planning Commission needs to be the body that puts the brakes on the project and insists on the kind of due diligence that has otherwise been lacking.

6. Any Action Taken Would be Premature

As noted above, the Planning Commission's own staff report indicates that "a staff recommendation on the master plan request is premature" and cites the following information as still needed:

1. Public and private roads and their features and dimensions must be clearly identified in the master plan. Detailed information on the location and widths of sidewalks and bicycle facilities must also be provided on the master plan.
2. An open space plan, including a preliminary design treatment for open space, must be provided. It is unclear whether this will be publicly or privately owned open space, who will make improvements to it and who will maintain it. This information must be provided in the master plan.
3. Not enough detail exists in the stadium site plan to determine whether the development meets density, height, and setback requirements and master plan standards. This information needs to be provided as part of the site plan submittal.
4. A preliminary landscape plan indicating street trees and landscape treatment of streets and public spaces must be provided.
5. A preliminary stormwater plan identifying preliminary locations of structures and methods to be used in managing stormwater and surface water on the site must be submitted.
6. Master plan guidelines should be submitted addressing the areas of bicycle facilities; landscaping; street furnishings/lighting/wayfinding; building placement, heights, massing, form and facades; energy efficiency; parking; stormwater management; utilities; and public art.

Even if such information is forthcoming in the next month, to vote in July without gathering additional public input—after concerned residents have had the chance to carefully review this additional information—ensures that we will end up with a project far inferior to that which could be achieved by asking tough questions and having the kind of robust public engagement process that such a major development demands.

It is my hope that your loyalty toward the residents of the city and holding the City Council accountable for the language of its own resolution will take precedence over loyalty to the individual who appointed you to this position.

Thank you.