



860 St Clair Ave
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SummitHillAssociation.org

May 15, 2019

City Councilmembers
15 Kellogg Blvd.
W. 310-B City Hall
Saint Paul, MN 55102

Dear Councilmembers

The Summit Hill Association District 16 Planning Council held its regular meeting on May 9th, 2019, and, in a unanimous vote of all board directors present, authorized a letter with the following public comments on the draft 2040 Saint Paul Comprehensive Plan.

The Summit Hill Association District herein submits the following comments:

- 1) SHA generally supports the plan
- 2) SHA has specific and concrete concerns pertaining to the **Neighborhood Nodes** section, as outlined below: The 2040 Plan does not distinguish between a *developed* and an *undeveloped Neighborhood Node* (NN). This is an important distinction. *Developed* Nodes, such as Grand and Victoria, both historically and presently function as neighborhood gathering spots. Among the other several dozen identified NNs, there are proposed *undeveloped* NNs, which will require the “more intense development” that the Plan repeatedly calls for in order to serve as neighborhood gathering spots. *Developed* Nodes, like Grand and Victoria, already provide this important community amenity.

In Contrast, in LU 11 on **Neighborhood Centers** (NC), the twelve NCs are divided into “Existing” and “Proposed”; the Plan further notes that:

Existing Neighborhood Centers are not all developed at the same level of intensity. Moreover, some existing Neighborhood Centers, such as Saint Anthony, are expected to have modest growth, while others, such as Highland Village, are expected have greater growth.

More specifically, SHA is concerned that listing NNs without a distinction between *developed* and *undeveloped* Nodes could encourage overdevelopment and diminish the neighborhood focus of Nodes. Grand and Victoria and other existing NNs could be developed to an extent that would increase car traffic to the detriment of walkability, and at a loss of the stated goal of providing pedestrian-friendly neighborhood amenities. The side note to LU-27 says:

The most frequent comments received from the community for the Land Use Chapter expressed a desire to have amenities within walking distance of home, such as neighborhood businesses and grocery stores, parks, playgrounds and open space, and libraries. ... Creating a land use mix and high-quality urban design that invites pedestrians to linger at Neighborhood Nodes will make the city more walkable.

For *developed* Nodes, additional development must be carefully planned to respect the sensitive balance of the neighborhood. We would like to see language added to differentiate between *developed* and *undeveloped* Nodes, and to recognize that in *developed* NNs, planning should support retaining the existing vibrant gathering spots within historic commercial and mixed-use buildings. New development is not always the most appropriate



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choice to support and enhance our *developed* NNs. Modest growth along with investment in existing community assets should be the focus for some of our Neighborhood Nodes, like Grand and Victoria.

Sincerely,

Summit Hill Association/ District 16 Planning Council
Board of Directors