From: James Doyle <doyle@macalester.edu> **Sent:** Tuesday, October 20, 2020 4:03 PM

To: *CI-StPaul_Contact-Council <Contact-Council@ci.stpaul.mn.us>; CouncilHearing (CI-StPaul)

<CouncilHearing@ci.stpaul.mn.us>

Subject: Public comment on RLH CO 20-13

Hello - please add my following comment to the public record associated with RLH CO 20-13. Thank you.

Dear City of St. Paul Councilmembers:

My name is Jim Doyle and I am a constituent of Councilmember Thao in Ward 1 (1403 Laurel Ave. 55104). I am writing today to ask you to support a variance regarding the placement of a vertical hydroponic farm owned by Minnesota Acre Farms , LLC within the St. Paul city limits (Oct 21 agenda item RLH CO 20-13). I see this as a great opportunity for the City to join other Minnesoat cities like Minneapolis and Shoreview in developing innovative methods of sustainable urban food production.

My understanding is that a Legislative Hearing Officer has recommended that the farm be removed since it is strictly classified as a storage container and therefore violates city zoning regulations on storage units. In my view this is a short-sighted and bureaucratic recommendation not based in either fact or in the best long-term sustainability goals of the City.

First, the facility is not a storage unit. It will be a fully functioning urban farm that will produce fresh, pesticide and herbicide free vegetables year-round, at the level of a ~2 acre farm 365 days a year. The fact that the facility uses a storage container as its outer shell is merely for convenience and is completely irrelevant to its purpose and function.

Second, this approach has the potential in the long run to help solve a major conundrum of sustainable agriculture in northern climates. How do we provide fresh produce to our cities year round without the need for transporting produce from thousands of miles away? Vertical hydroponic farming is an innovative idea that can provide food security as well as reduce the carbon footprint of food production. It offers a flexible, mobile, and scalable method of urban farming in cold climates that needs to be tried and tested, and what better place to carry out this experiment than in St. Paul?

One of the priorities of the St. Paul Climate and Resiliency Plan is to "Encourage equitable spatial distribution of community assets to improve food security, including urban farms, community gardens, food markets, and healthy food options" and further notes that "most fresh fruits and vegetables have already traveled 1,500 miles before arriving at your local grocery store. By purchasing locally grown food, you can reduce the impact of that transportation".(October 2019, pg 26 and 31). The vertical hydroponic farm proposed by Minnesota Acre Farms embodies these goals and gives the City credibility as one of the leaders in innovative approaches to local food production.

I have driven by the facility (located just a few blocks from my home) and it is completely unobtrusive, located in the back of a parking lot and barely visible from the street (Snelling Ave.). I'm sure that the city code on storage facilities has a rational motivation, but in my view it does not apply in this case. St. Paul can and should be an innovator in local food production and this project is a significant step in that

direction. I urge you to take the common sense approach here and allow a variance for this project to proceed.

Thank you for reading this, and thank you for all of your contributions to our City.

best,

Jim Doyle 1403 Laurel Ave. St. Paul, MN 55104

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James R. Doyle (he/him/his)
Department of Physics and Astronomy
Macalester College
1600 Grand Ave.
St. Paul, MN 55105
651-696-6627