



April 22, 2025

VIA E-MAIL

Zoning Committee, City of Saint Paul
Planning Commission, City of Saint Paul
1400 City Hall Annex
25 West 4th Street
Saint Paul, MN 55102

**Re: Review of Site Plan Review Application for proposed facility at 560 Randolph Avenue
(City File #25-015-397)**

Dear Members of the Zoning Committee and Planning Commission:

This letter is submitted on behalf of FCC Environmental Services, LLC (“**FCC**”) in connection with its Site Plan Review Application (“**Application**”) to the City of Saint Paul (the “**City**”) requesting approval of the site plan (“**Site Plan**”) for FCC’s proposed waste collection dispatch facility (the “**Facility**”) at 560 Randolph Avenue (the “**Property**”). FCC is excited to invest in this project in the City and bring vital solid waste services to the greater community pursuant to its new waste collection scheme. FCC also appreciates the opportunity to answer any questions the City may have about the proposed Facility. For the reasons stated herein, the Application demonstrates that the Facility meets all requirements for site plan approval set forth in Saint Paul Legislative Code (the “**Code**”) Section 61.402. As such, FCC respectfully requests that the Planning Commission approve the Site Plan for the Facility.

I. Factual Background

This Facility is part of a new transition for waste collection and disposal in the City. FCC is a globally established solid waste services company that currently serves over twelve (12) million Americans in over thirty-five (35) cities in seven (7) states. Throughout its tenure in the industry, FCC has been dedicated to providing dependable waste collection services, as well as finding new and innovative ways to decrease its contribution to the industry’s carbon footprint. FCC has intentionally moved toward increased use of compressed natural gas (CNG)-fueled vehicles and streamlined operations to limit truck traffic and congestion in the cities in which its fleets operate. On February 29, 2024, FCC was awarded a Solid Waste Collection Services contract (the “**Contract**”) by the City, and is thrilled to be entrusted with the opportunity to expand its operation to Saint Paul.

In order to facilitate its services to the City pursuant to the Contract, FCC acquired the Property due to its convenient location, lot size, and long-standing use by previous owners for companies related to trucking and maintenance. The Property is located within an I1 Light Industrial Zoning District, and is surrounded by vacant land and railroad and industrial uses. FCC intends to use the Facility as its main operational dispatch and maintenance center for providing waste collection services pursuant to the Contract, and anticipates dispatch of a thirty-six (36) truck fleet to serve over sixty-six thousand (66,000) residential units in the City. The management and dispatch team

plans to occupy the existing office space on site, while the existing truck maintenance facility will be repurposed to serve FCC's fleet, including installation of CNG fueling equipment and dispensing system.

II. Procedural Background

In order to service the Contract, FCC was required to obtain municipal licensure to operate the Facility, a condition of which was approval of an appropriate site plan. As noted in the Staff Report, FCC previously submitted a Request for Statement of Clarification on December 16, 2024 (the "**Statement of Clarification**") asking Staff to determine and issue its finding as to whether FCC's proposed Facility was similar to a "public works yard or maintenance facility," a permitted use within the I1 zoning district.¹ In preliminary discussions with Staff regarding its anticipated site plan and use of the Facility, FCC was guided by Staff to submit this request to confirm appropriate use of the Property pursuant to the City's zoning ordinances. Staff considered the Code requirements for a determination of similar use and issued a Statement of Clarification on January 10, 2025, finding that FCC's proposed Facility is similar in character and impact to a public works yard or maintenance facility. Simultaneous with this similar use determination process, FCC prepared the Site Plan and submitted its Application for site plan approval on January 24, 2025.

The Statement of Clarification was appealed by the West 7th/Fort Road Federation (the "**Appeal**") and ultimately overturned by the City Council on March 19, 2025. However, FCC and Staff continue to agree that the proposed Facility is consistent with a public works yard or maintenance facility as contemplated by the Code. Pursuant to its letter to Staff dated March 24, 2025, FCC clarified submission of its Site Plan to operate the Property as a public works yard or maintenance facility and requested review of the Application pursuant to this land use. In order to provide for waste collection services during the site plan review process, and to avoid a public health and safety emergency in the interim, City Mayor Melvin Carter declared a temporary state of local emergency on March 31, 2025,² which the City Council unanimously extended on April 2, 2025 to allow an additional ninety (90) days for completion of FCC's licensure process.³ On April 14,

¹ Code § 66.521.

² Any allegation that the need for an emergency declaration was due to a "failure" by FCC to complete development of the Property for its proposed Facility, and that the reason for such "failure" is due to FCC's delayed submission of site plan documentation, is inaccurate. Site plan approval, not completion of construction, is the prerequisite to FCC obtaining its licensure and commencing operations at the Property to service the Contract. Appeal of the determination of similar use delayed the City's ability to consider the Application, which was submitted shortly after issuance of the Statement of Clarification. This delay resulted in the City's emergency declaration, not any "delay" by FCC to submit necessary documentation to the City.

³ It is FCC's understanding that that the extended timing of the state of local emergency shall be utilized to complete the site plan approval process for the Property as a prerequisite to licensure, and not to identify a new or different site for the proposed Facility.

2025, City Mayor Melvin Carter also vetoed the City Council's grant of the Appeal pursuant to Section 6.08 of the City's Charter.

III. The Application meets the Code standards required for site plan approval.

Section 61.402(c) of the Code sets forth the standards that are to be considered by the Planning Commission in evaluating a request for site plan approval. Specifically, the Code states that "[i]n order to approve a site plan, the Planning Commission shall consider and find that the site plan is consistent with:

1. The City's adopted comprehensive plan and development or project plans for sub-areas of the City.
2. Applicable ordinances of the City.
3. Preservation of unique geologic, geographic or historically significant characteristics of the City and environmentally sensitive areas.
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.
5. The arrangement of buildings, uses, and facilities of the proposed development in order to ensure abutting property and/or its occupants will not be unreasonably affected.
6. Creation of energy-conserving design through landscaping and location, orientation and elevation of structures.
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.
8. The satisfactory availability and capacity of storm and sanitary sewers, including solutions to any drainage problems in the area of the development.
9. Sufficient landscaping, fences, walls and parking necessary to meet the above objectives.
10. Site accessibility in accordance with the provisions of the Americans with Disabilities Act (ADA), including parking spaces, passenger loading zones and accessible routes.

11. Provision for erosion and sediment control as specified in the Minnesota Pollution Control Agency's 'Manual for Protecting Water Quality in Urban Areas.'"⁴

In the Zoning Committee Staff Report dated March 31, 2025 (the "**Staff Report**"), City planning staff ("**Staff**") concluded that all eleven (11) of these standards were satisfied. Given the thorough multi-department review that the City and Staff have performed to issue the Staff Report, we will not repeat each of these factors in this submission. We will instead use this submission to explore in further detail specific aspects of the site plan review standards which may benefit from further detail, support and clarification. For the reasons set forth below and in the Staff Report, the Site Plan meets all of the criteria set forth in the Code and, therefore, the Application should be approved.

A. Standard 2: The Site Plan and Facility are consistent with the applicable City ordinances.

The Minnesota Statutes authorize municipalities to control land use within its boundaries under zoning regulations.⁵ Pursuant to this authority, the City has determined that certain uses are permitted within certain zoning districts. The site of the proposed Facility currently lies within a I1 Light Industrial zoning district. Over ninety (90) land uses are permitted within this district, along with an additional number of conditional uses.⁶

- i. The Facility constitutes a public works yard or maintenance facility, which is a permitted use within the I1 Light Industrial zoning district.

As discussed above and noted in the Staff Report, this Application has a complicated procedural history. FCC previously submitted a Request for Statement of Clarification. In preliminary discussions with Staff regarding its anticipated site plan and use of the Facility, FCC was guided and worked closely with Staff to submit this request to confirm appropriate use of the Property pursuant to the City's zoning ordinances. Staff's determination was appealed and overturned by the City Council, which was ultimately vetoed by the mayor for conflicting with "state statutes, city codes, legal precedent, the administrative record, [and] the [City] Council's own record and values."⁷ Throughout this entire process, FCC and Staff have remained aligned in their analysis and understanding that the proposed Facility constitutes a public works yard or maintenance facility as contemplated by the Code. In its Staff Report, Staff from the City's Zoning Section of the Department of Safety and Inspections determined that the proposed Facility set forth in the Site

⁴ Code § 61.402(c).

⁵ Minn. Stat. § 462.357, subd. 1.

⁶ See Code § 66.521.

⁷ See Letter from Office of Saint Paul Mayor Melvin Carter regarding veto of Resolution No. 25-570 (April 14, 2025).

Plan and Application materials qualifies as a public works yard or maintenance facility, making the prior similar use process moot.

Because “public works yard or maintenance facility” is not defined in the Code, the use must be considered pursuant to its ordinarily accepted meaning and/or the context in which it is implied.⁸ Under these circumstances, Staff has authority to apply a reasonable and ordinarily accepted meaning of the term within the specific context at issue to determine whether a particular land use is permitted. The meaning applied by Staff for “public works yard or maintenance facility” in its analysis is both ordinarily accepted and reasonable. A public works yard or maintenance facility is used to store, maintain, repair equipment, vehicles, materials, tools necessary for public services.⁹ The Minnesota Statutes and Code obligate the City to provide numerous public services to its residents, including, but not limited to, ensuring that every residential household and business in the municipality has solid waste collection service, which may be organized via contract.¹⁰ Given the Code does not provide a definition, Staff is given ample deference to reasonably determine the meaning of the term.

- ii. The proposed use of the Facility is consistent with the intent of the I1 Light Industrial zoning district set forth in the Code.

The I1 zoning district is intended to accommodate industrial operations whose external physical effects, unlike a large scale or specialized industrial operation, are restricted to the area of the district and in no manner affect surrounding districts in a detrimental way.¹¹ While community members have alleged that traffic anticipated to be generated by the Facility will affect the surrounding neighborhoods, traffic is not the type of “external physical effect” contemplated by the City’s zoning ordinance. The Code clearly does not consider traffic generation to be an external physical effect, because the Code permits several uses within the I1 zoning district that result in standard traffic-related noise and congestion. Any number of these uses, such as drive-through sales and services, an auto convenience market, car wash, commercial parking facility, bus station, taxi dispatching and maintenance, or recycling collection center or drop-off station, would generate as much, if not more, traffic than the proposed Facility is anticipated to produce.¹² No argument can be or has been made that these uses would not be permitted in the I1 zoning district. Any allegation that fleet-based operations are inconsistent with the zoning district due to traffic concerns is illogical given the permitted uses set forth in the Code.

⁸ See Code § 65.001.

⁹ Staff Report at 3.

¹⁰ Minn. Stat. §§ 115A.94, subd. 3(a); 115A.941, sub. (a).

¹¹ Code § 66.512.

¹² Anticipated traffic generation of the proposed Facility is further discussed later in this letter.

Further, the City demonstrates the types of external physical effects it may be concerned with by differentiating between the I1 Light Industrial and I2 General Industrial zoning districts. The I2 zoning district is intended to permit those industrial uses whose external effects will be felt in surrounding districts.¹³ Therefore, the Code provides guidance on anticipated external physical effects by allowing uses with such effects, either as a permitted or conditional use, in the I2 zoning district while wholly prohibiting those same uses in the I1 zoning district.¹⁴ Examples include:

- Municipal incinerator;
- Power plant;
- Sewage treatment plant;
- Intermodal freight yard;¹⁵
- Motor freight terminal;¹⁶
- General industrial;¹⁷
- General outdoor processing;¹⁸
- Hazardous waste processing facility or recycling transfer facility;¹⁹
- Infectious waste processing facility;²⁰
- Mining;²¹

¹³ Code § 66.513.

¹⁴ See Code § 66.521.

¹⁵ See Code § 65.760.

¹⁶ See Code § 65.761.

¹⁷ See Code § 65.811 (“General industrial uses include, but are not limited to, the following: (a) Production, processing, cleaning, servicing, testing, repair or storage of materials or products which shall not be injurious or offensive to occupants of adjacent premises by reason of the emission of noise, vibration, smoke, dust or particulate matter, toxic and noxious materials, odors, glare or heat, except those uses specifically first allowed as permitted uses in the I3 heavy industrial district; (b) Storage and processing facilities for building materials including, but not limited to, brick, concrete, gravel, sand, stone, tile and wood; (c) Manufacture, processing and reprocessing of batteries; toxic chemicals; fertilizer; oils and oil-based paints, lacquers and varnishes; raw plastics; synthetic resins and fibers; and natural or synthetic rubber, including tires and inner tubes; (d) Grain, feed and flour milling, processing and storage; (e) Steel mills, metal refining and other processing that requires intense heat.”).

¹⁸ See Code § 65.812.

¹⁹ See Code §§ 65.830; 65.831.

²⁰ See Code § 65.833.

²¹ See Code § 65.842.

- Motor vehicle salvage operation;²²
- Outdoor recycling processing center;²³
- Solid waste compost facility or transfer station.²⁴

These types of higher impact industrial uses, which are likely to have greater off-site impacts and require special measures and careful site selection to ensure compatibility with the surrounding area, demonstrate the types of external physical effects that the Code designs the I1 zoning district to avoid.²⁵ Traffic generation is clearly not an external physical effect which would be contrary to the intent or goals of this design.

While there is a continued claim that many of FCC's competitors within the solid waste collection industry operate their facilities within I2 General Industrial zoning districts in the City, this argument is irrelevant to the Facility's consistency with the I1 zoning district. The fact that other waste collection services have chosen to operate in I2 zoning districts does not preclude the use from also being permitted in the I1 zoning district. Public works yard and maintenance facility uses are also permitted in the I1 zoning district.²⁶ It may be purely by chance that these facilities were placed on I2 zoned property (such as property values and availability at the time of acquisition, convenience, etc.). Further, many of FCC's competitors utilize their facilities for heavier and higher-impact uses (such as waste storage, waste disposal, etc.) than fleet dispatch and maintenance, which necessitate that the site be within the I2 zoning district. Other than standard garbage production from operation of the on-site office and truck maintenance facilities, which will be aesthetically integrated and positioned into the property to maintain a clean and organized appearance,²⁷ no outdoor storage of trash which would create a physical external effect will take place on the Property in defiance of purpose of the I1 zoning district.

The Application accurately sets forth the proposed use of the Property as a public works yard and maintenance facility, which is both a permitted use and consistent with the requirements of the I1 zoning district and all applicable City ordinances. Therefore, this standard for site plan approval has been satisfied and the Application should be approved.

²² See Code § 65.843 ("Any business whose principal activity is to obtain used motor vehicles to salvage and sell usable parts therefrom and which maintains a premises upon which to accumulate and dismantle such vehicles.").

²³ See Code §§ 65.844; 65.846.

²⁴ See Code §§ 65.847; 65.848 (A solid waste transfer station is "[a]n intermediate facility in which garbage, refuse and other solid waste collected from any source is temporarily deposited to await transportation to a waste facility. This includes sites for the sorting of construction and demolition material.").

²⁵ See Code § 65.811

²⁶ Code § 66.521.

²⁷ See Transportation Study at 5.

B. Standard 4: The Site Plan protects the adjacent and neighboring properties through reasonable provisions for those aspects of design which may have substantial effects on neighboring land uses.

As identified in the Staff Report, the Site Plan protects neighboring properties from potential effects of the Facility's operation through a number of efforts, including, but not limited to, improved and state-compliant stormwater runoff treatment through an underground detention system, exceeding required setbacks for off-street parking areas, and perimeter and interior landscaping and other screening designs to buffer operational views from adjacent properties. These efforts provide reasonable security to the surrounding properties from both safety and aesthetic perspectives.

The Site Plan, as well as FCC's licensure and permitting, also protect neighboring communities and the City more broadly through its advanced environmentally-conscious waste collection operations. Use of CNG-fueled vehicles is a major component of FCC's dedication to sustainability and stewardship in the community by lowering the overall carbon footprint of waste collection. Use of CNG-fueled vehicles for collection operations over ten (10) years will remove over thirteen thousand (13,000) metric tons of carbon dioxide from the atmosphere, equivalent to removing over three hundred (300) vehicles from the road. Additionally, CNG engines are up to ten (10) decibels quieter than a comparable diesel gas engine, helping to improve collection productivity while also minimizing disruption to the City's neighborhoods and communities.

Despite these numerous benefits, misinformation has created uncertainty surrounding the proposed Facility's use of CNG on the Property and to fuel the waste collection fleet. Unlike a traditional gasoline fueling station, CNG does not require storage of any fuel on-site through underground or aboveground storage tanks. CNG fueling stations are directly connected to the already existing natural gas lines within the City's infrastructure, the same system which services its neighborhoods and businesses. On the Property, an aboveground compressor accesses natural gas, compresses down the gaseous form, and relays the compressed fuel to the Facility's fueling station on a live, as-needed only basis. Again, no fuel is perpetually stored on the Property as part of CNG operations, and this process does not result in the production of any hazardous waste. Noise generated by the compressor is comparable to or quieter than a diesel truck when standing fifteen (15) feet away, and far quieter than the heavier industrial uses that surround the Property. The Property will also include an on-site dryer, which serves as a protective measure to remove any potential moisture that may come from the natural gas infrastructure and prevent issues such as freezing, blockages, operational issues, and corrosion. Given moisture is uncommon in Minnesota's natural gas pipelines, the dryer will primarily sit dormant but provides additional security for continued safe and efficient operation of the Facility.

Finally, FCC will be undertaking considerable remediation to improve the environmental condition of the Property from its current state. An unused and unmaintained septic system with a drain field currently lying under the Property will be removed, filled and otherwise remediated in conjunction

with the City guidance to connect the Facility to the municipal sewer system. As part of development of the site, potential contaminated soils on the Property will also be addressed in accordance with Minnesota Pollution Control Agency Requirements, including participation in the Minnesota Brownfields Program. Through these efforts, FCC will be modernizing vital utilities and infrastructure at the site and improving the Property from the deteriorated condition that has long existed under previous ownership.

The Site Plan satisfies the Code requirements for the protection of adjacent and neighboring properties and evidences FCC's commitment to be a good steward in the community. For these reasons, the Application should be approved.

C. **Standard 7: The Site Plan addresses safety and convenience of both vehicular and pedestrian traffic both within the site and in relation to access streets.**

The Site Plan adequately addresses safety and convenience of both vehicular and pedestrian traffic with respect to operation of FCC's proposed facility. As noted in the Staff Report, site plan review focuses on physical aspects of a proposed development, including "vehicular movement and off-street parking design, pedestrian connections, and infrastructure improvements."²⁸ The Site Plan has been designed to improve each of these aspects from the prior owner's configuration and use of the Property.

The Property previously included two (2) potential access points onto Randolph Avenue. The Site Plan seeks to consolidate access to the Property to a single entrance, which will be fitted with an automatic gate for increased security and safety considerations. The existing driveway at the intersection of Randolph Avenue and Erie Street will no longer be maintained or used, minimizing incoming and exiting traffic between the Property and Randolph Avenue to a single driveway, which will be properly sized and designed for FCC's fleet vehicles. The Site Plan is designed to accommodate all parking needs for operation of the Facility, requiring only off-street parking for all fleet, maintenance, and employee vehicles.²⁹ Vehicle turning movements for fleet and emergency vehicles were reviewed and approved by the City's Public Works Traffic Engineering Division and Fire Safety Division without any concerns for proper maneuvering into, out of or within the site.

Further, several safety measures have been incorporated into the Site Plan to improve pedestrian and bike safety near with Property. The Property currently lacks any infrastructure for these types of travelers. As such, FCC, the City and Ramsey County have collaborated to provide for

²⁸ Staff Report at 6.

²⁹ The Site Plan is designed to accommodate thirty (30) parking spaces appropriately sized and located on the Property for CNG fleet trucks, fifteen (15) parking spaces appropriately sized and located for diesel "mini-packer" trucks, and seventy-five (75) parking spaces appropriately sized and located for employee parking. Notwithstanding the design of the Site Plan, FCC anticipates operation with twenty-four (24) CNG-fueled trucks, ten (10) "mini-packer" trucks, and one (1) box truck.

expansion of the boulevard along Randolph Avenue within the site so that a new sidewalk may be constructed within the expanded right-of-way to provide a convenient, designated, and ADA compliant space for pedestrians and bike travelers to travel near the Property. A portion of the sidewalk will adjoin the existing guardrail and retaining wall along Randolph Avenue to maintain separation from vehicular traffic. The consolidated access point to the Property and security gate system will further improve safety conditions for individuals utilizing the new sidewalk.

- i. The Site Plan adequately examines and accounts for the anticipated traffic to be generated at the Facility and reasonable comparison to other public works yards and maintenance facilities.

During its consideration of the appeal of the Statement of Clarification, the City Council noted a lack of data related to traffic anticipated to be generated by the Facility. The FCC Environmental Services Facility Transportation Study dated March 6, 2025 (the “**Transportation Study**”) prepared by Transportation Collaborative & Consultants, LLC, provides evidence of the proposed traffic to result from FCC’s operation of the Property. As noted in the Staff Report and Transportation Study, FCC anticipates approximately seventy-five employees (75) to arrive and leave the site each day. During yard waste season (approximately April through November), twenty-nine (29) daily routes are anticipated to be serviced from the Property, with route numbers anticipated to decrease during the non-yard waste season and as operations increase in efficiency. Despite this, the Transportation Study appropriately analyzes the **maximum potential** operation of the site and anticipated traffic that may be generated by such operation.

The Transportation Study considered peak-hour traffic generated by employee vehicles (making a single trip to and single trip from the Property), daily waste collection servicing vehicles (also making a single trip to and from the Property), and maintenance and/or staff vehicles (which may make intermittent trips to and from the Property depending on need in the event of breakdown, scheduled maintenance, etc.). In the event FCC operated the maximum number of vehicles that could be accommodated by the Site Plan per the Transportation Study, which is up to seventy-five (75) employees and forty-five (45) daily route and/or servicing vehicles, and each of those vehicles made the maximum number of trips that could be anticipated for operation of the Facility, the Transportation Study determined potential generation of up to two hundred eighty (280) daily trips.³⁰ These trips are not anticipated to coincide with typical peak periods of the adjacent roadways to the Property.³¹

Compared to other public works yards and maintenance facilities located in the City’s I1 zoning districts, which also include employee passenger vehicle parking and truck storage, the proposed

³⁰ Transportation Study at 4.

³¹ Transportation Study at 4 (“The peak hours of the proposed facility are assumed to occur from 6 to 7 a.m. and 4 to 5 p.m. These periods are just outside the typical peak periods of the adjacent roadways, which generally occur from 7:30 to 8:30 a.m. and 4:30 to 5:30 p.m.).

Facility's operation will generate very similar, if not less, anticipated traffic.³² The roadways adjacent to the Property—Randolph Avenue, 7th Street / Highway 5, and Shepard Road—are designated commercial truck routes, designed to accommodate nine (9)- and ten (10)-ton trucks well beyond the weight of a waste collection vehicle.³³ Further, the City has planned Randolph Avenue's roadway capacity for up to ten thousand (10,000) vehicles per day, which currently averages only four thousand (4,000) daily trips.³⁴ Even with the anticipated maximum traffic generation from the Facility, the surrounding transportation corridors will not be substantially or negatively impacted by this use of the Property.

The Staff Report and Transportation Study analysis demonstrates the Site Plan's consideration of the anticipated traffic from the Facility and highlights that the Facility will have a lesser impact on surrounding areas compared to communities adjacent to other public works yards and maintenance facilities in the City, or otherwise designed for less traffic use.

ii. The Facility is not the primary impediment to the surrounding neighborhoods' access to the Mississippi River.

As you are aware, a concern of community members with respect to the proposed Facility is the idea that continued industrial use of the Property, for which the Property is zoned and continues to be guided in the City's 2040 Comprehensive Plan,³⁵ will prevent access from nearby neighborhoods to the Mississippi River. However, these allegations misrepresent the nature of both the Property and adjacent properties which also separate the area's residential communities from the Mississippi River.

Directionally, the Property is located in the proximity of the Mississippi River corridor. However, several industrial uses and other infrastructure lie between the Property and the River which would not be conducive to access. Immediately southeast of the Property lie several lines of railroad track owned and operated by Chicago and North Western Transportation Company, who also owns and utilizes the large parking facility immediately southwest of the Property. Automobiles are unloaded and loaded from train cars daily along these rail lines. Further south of the Property are additional railroad lines owned and operated by Archer Daniels Midland Company, along with a large grain storage and elevator facility. Operation of this facility generates both truck and rail traffic within approximately eighteen (18) acres of land situated between the Property and Mississippi River. Beyond the grain facility lies Shepard Road, a four (4) lane divided principal arterial roadway and

³² Staff Report at 6 (with the Dale Street facility generating five hundred forty-one (541) daily trips, and the Burgess Street facility generating two hundred eight (208) daily trips, on average).

³³ See Saint Paul for All: 2040 Comprehensive Plan, Map T-15.

³⁴ Transportation Study at 5.

³⁵ See 2040 Comprehensive Plan, Map LU-2.

designated commercial truck route with left- and right-turn lanes, no transit service, and no on-street parking. Finally, Shepard Road is lined by a greenbelt separating its sidewalks from any public access to the River. Even without consideration of FCC's proposed use of the site, the argument that the Property is superiorly situated for high density development with prime access to the Mississippi River corridor is an unrealistic view of the site location and its surroundings. For the reasons set forth above, the Site Plan satisfies the standard set forth in the Code which requires analysis and address of safety and convenience of both vehicular and pedestrian traffic both within the site and in relation to access streets. Given the ample evidence of these efforts set forth in the Application, the Site Plan should be approved.

IV. Conclusion

The proposed Facility will result in a mutually beneficial venture between FCC and the City to provide dependable and ecologically-sensitive waste collection services to tens of thousands of St. Paul residents. As demonstrated above, and in the Application and Staff Report, the Facility and the Site Plan satisfy the standards for approval set forth in City Code Section 61.402(c). Accordingly, FCC respectfully requests that the Zoning Committee recommend, and the Planning Commission decide, to approve the Site Plan for FCC's proposed Facility at 560 Randolph.

Very truly yours,

/s/ Daniel Rumsey

Daniel Rumsey
Regional Vice President
FCC Environmental Services

cc: Joel Blake (via email)
Katherine A. Johnson (via email)



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Public Comment Opposing the Site Plan for 560 Randolph Avenue

FILE # 25-015-397

Submitted by the West 7th / Fort Road Federation

The West 7th / Fort Road Federation opposes the proposed site plan for 560 Randolph Avenue because it represents a fundamental conflict with Saint Paul's long-term vision for this corridor. This plan would entrench an industrial waste hauling facility in a location explicitly identified by multiple city-adopted plans as a future site for mixed-use and residential redevelopment. The proposal undermines key policies in the 2040 Comprehensive Plan and its formally adopted addenda—including the Great River Passage Plan, the Mississippi River Corridor Plan, and the Fort Road Development Plan—all of which emphasize environmental stewardship, pedestrian-friendly design, equitable access to the Mississippi River, and vibrant neighborhood development.

This project would introduce heavy industrial traffic and environmental risks to one of the city's most sensitive and strategically located sites, jeopardizing its potential to serve as a river-oriented, transit-supportive neighborhood node. It fails to protect public access to the river, ignores critical infrastructure challenges, and imposes disproportionate burdens on a historically underserved neighborhood.

In the public comment that follows, we will focus on several key areas of concern, including the **inconsistency of this proposal with adopted city plans, the negative impact on neighborhood livability and future development potential, and the safety risks to pedestrians and cyclists**. We will also highlight especially **troubling issues related to sewage and stormwater management**, including insufficient information about how the facility will handle waste runoff, its potential impact on Fountain Cave, and the risk of contamination to the Mississippi River. These concerns underscore the need for far greater environmental diligence and reinforce why this site plan should not be approved.

In order to approve the site plan, the planning commission shall consider and find that the site plan is consistent with eleven conditions. We've highlighted our top concerns below.

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

We have been consistently informed by city staff, attorneys, and members of the Planning Commission that “the Comprehensive Plan trumps all.” On this point, we agree. The 2040 Comprehensive Plan, along with its formally adopted addenda—such as the Great River Passage Plan and the Mississippi River Corridor Plan—establishes a clear policy direction that conflicts with the development of an industrial trash truck facility at this critical neighborhood node.

However, the claim that “the Comprehensive Plan trumps all” is often used to justify prioritizing a single section of one map in the plan’s appendix over the numerous conflicting policies and formally adopted addenda that specifically guide the future of this site. This narrow interpretation fails to account for the broader intent of the Comprehensive Plan—to provide a cohesive and balanced vision for land use across the city. Relying solely on the future land use map while disregarding the plan’s established policies results in an incomplete and misleading application of the city’s long-term goals. Using this single map as the definitive ruling shuts down meaningful discussion about the broader objectives of the Comprehensive Plan; and it has been used that way throughout this process.

This approach also ignores several key contradictions within the 2040 Comprehensive Plan itself, as well as the addenda to the plan (most notably the Great River Passage Plan and Mississippi River Corridor Plan, but also the Fort Road Development Plan and the Brewery/Ran-View Plan). These addenda, while acknowledging the potential for industrial use “for some time,” specifically foresee residential development as a long-term use for this site. In fact, as Bill Dermody, Planning Manager, noted in his February 7, 2025 memo to Farhan Omar, the plans—including the Brewery/Ran-View Plan and the Great River Passage Master Plan—identify this location for eventual residential use, contingent on site cleanup and redevelopment. As Dermody states, “The four Comprehensive Plan addenda that address this site’s future land use foresee residential as a possible long-term use,” and the Great River Passage Master Plan and Brewery/Ran-View Plan explicitly acknowledge that industrial uses are slated to continue temporarily.

While industrial uses may continue for some time, allowing FCC’s operations on this site will further entrench the property’s industrial character, making it more difficult, if not impossible, to transition the site or surrounding parcels to the mixed-use or residential purposes envisioned in the city’s long-term plans. These plans, authored in partnership with the community, represent a consensus of multiple city-adopted strategies and reflect a clear preference for future residential or mixed-use development that aligns with the broader vision for neighborhood connectivity, environmental quality, and pedestrian-friendly spaces. By allowing industrial operations to persist without addressing these forward-looking policies, the city would undermine its own stated goals for the site and delay or complicate future efforts to transition this critical property into the vibrant, sustainable neighborhood the city and community envisions.

Policy LU-46 of the Saint Paul 2040 Comprehensive Plan states:

“Retain and protect current industrial land from conversions to residential or institutional uses unless guided otherwise in a City of Saint Paul adopted plan.”

While Policy LU-46 advocates for retaining industrial land, the site in question is explicitly guided toward alternative uses by several city-adopted plans. These plans, which are still in effect, consistently identify 560 Randolph Avenue as a critical site for redevelopment with mixed-use housing or river-oriented projects that enhance public access and neighborhood connectivity.

- The **Great River Passage Plan** (2013) explicitly designates 560 Randolph Avenue as a key river oriented redevelopment site, emphasizing its role in reconnecting the West 7th corridor to the Mississippi River. The plan outlines a vision for transforming former industrial areas along the river into vibrant, mixed-use spaces that enhance public access, neighborhood livability, and environmental stewardship. Specifically, the plan prioritizes integrating green infrastructure, improving roadway aesthetics, and fostering development that maximizes proximity to the river while maintaining public access. It further identifies this site as critical to the Island Station redevelopment area, reinforcing the importance of pedestrian-friendly design and river-oriented land use.
- The **Mississippi River Corridor Plan** (2002) identifies the site as part of a broader vision for urban redevelopment, emphasizing river access and connections to the surrounding neighborhood.
- The **Fort Road Development Plan** (2005) supports rezoning of this site and prioritizes this location for creating public green spaces and integrating pedestrian-friendly streetscapes along Randolph Avenue.
- The **District 9 Small Area Plan** supports rezoning this site to better reflect changing land use patterns.

While the site remains zoned industrial today, multiple city-adopted plans—including the Great River Passage Plan, Mississippi River Corridor Plan, Fort Road Development Plan, and Brewery/Ran-View Plan—clearly envision its transition to mixed-use and residential development.

The failure to formally rezone the site does not indicate that industrial use remains appropriate, but rather that city processes have not yet caught up with the city's own long-term vision. Delays in rezoning may have resulted from competing priorities, staffing constraints, or administrative processes, but these factors do not override the planning documents that explicitly guide this site's future use. The continued industrial zoning of 560 Randolph Avenue is an oversight—one that must be corrected to align with adopted policies. If the city is committed to implementing its long-term planning vision, this site should be rezoned accordingly to prevent an incompatible industrial use from undermining decades of strategic planning and community engagement.

Even the staff report prepared for the Zoning Committee acknowledges that the Great River Passage Plan envisions redevelopment of this site “as opportunities arise”—which is exactly what we are arguing for today. These plans are not “de-certified” or of lesser importance than what is written in the current plan. They remain formally adopted addenda to the 2040 Comprehensive Plan and continue to hold full policy weight.

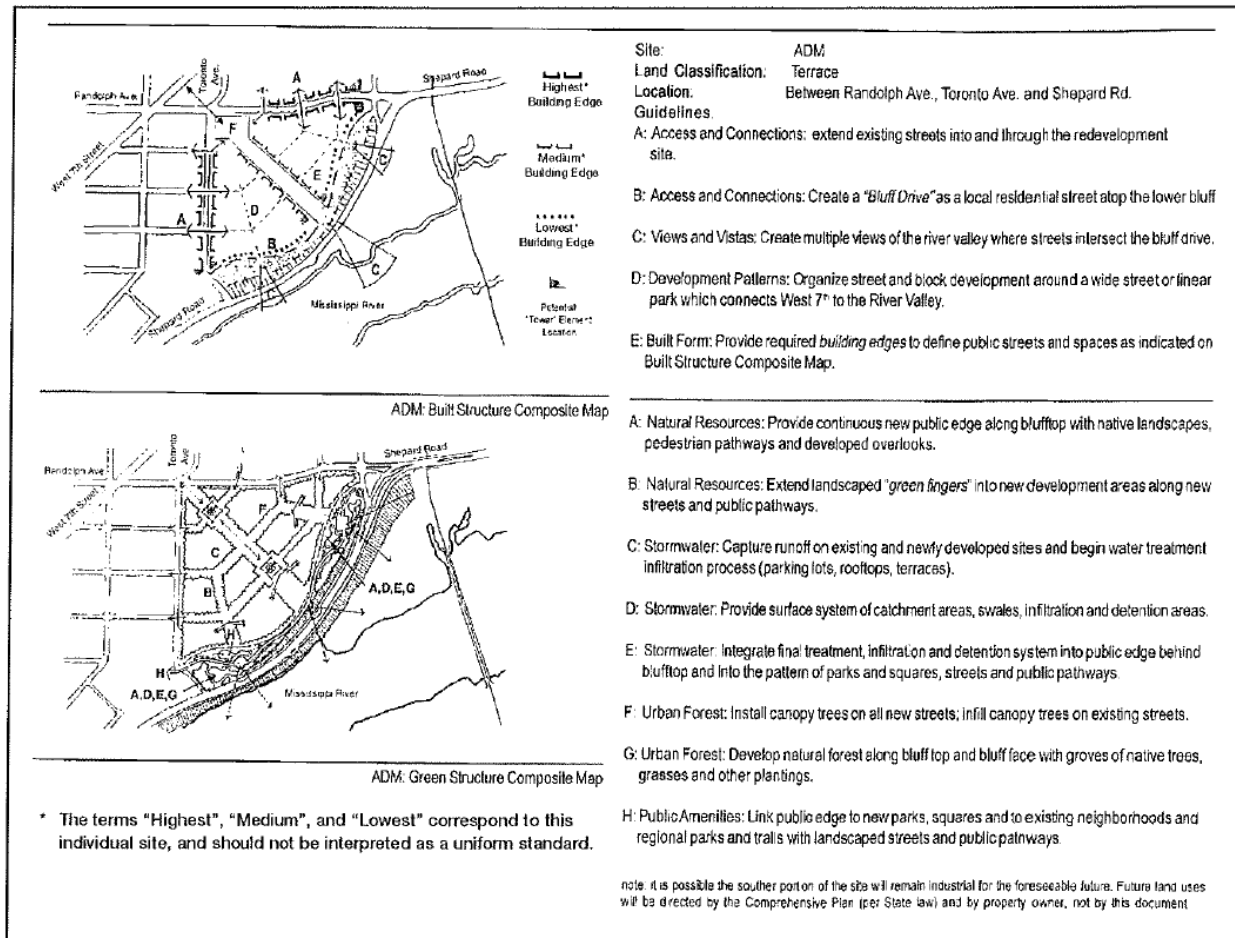


Figure 7: Mississippi River Corridor Plan vision for key redevelopment sites along the river.

LEGEND

- | | |
|---|--|
| 1. Marina | 9. Rustic & Mountain Bike Trails |
| 2. Peninsula Festival Lawn | 10. Potential Pedestrian / Bike Bridge |
| 3. Infill Development | 11. Fishing Access |
| 4. Canoe / Kayak Launch / Small Craft Dock | 12. Fountain Cave Investigation |
| 5. Renovated Island Station Building / Outdoor Cafe | 13. Randolph Station Area |
| 6. Climbing Wall / Ice Wall | 14. Samuel H. Morgan Regional Trail |
| 7. Performance Lawn / Pond Hockey | 15. Shepard Road Regional Trail |
| 8. Mountain Bike Skills Course | |



This plan is a concept only, and is subject to further planning, design and public input.

Redevelop Island Station to become a center for river-oriented arts and leisure activities

The peninsula on which the old Island Station power plant is located will be transformed, through a public-private partnership, into a mixed-use center for adventure, recreation, visitor services, residences, offices, and a community park with public access to the River. The repurposed building can become a center for not-for-profit environmental and art organizations, including the National Park Service regional offices, hotel, restaurants, shops and cafés. Offices can occupy upper floors, while industrial-scale artist's studios, river-oriented cottage industries and adventure sports activities can occupy the lower and ground levels, attracting people year round.

Utilize redevelopment to link the West 7th Street corridor to the river

Redevelopment of Island Station and the ADM site will provide a major missing piece to provide public access to and along the river between downtown and the Valley reach. Green connections between the peninsula and Shepard Road extend to the neighborhoods and to the West 7th Street business district. Enhanced streetscapes support redevelopment opportunities and pedestrian friendly neighborhood expansion along Randolph Avenue.



Ice Climbing attracts outdoor enthusiasts in the winter.



Outdoor Cafés support economic development and provide a desirable leisure activity.



Ropes Courses are one type of adventure sport that appeals to all ages.



Mountain Bike Skills Courses reduce environmental impact by educating riders

Figure 8: Page 67 of the Great River Passage Plan

Furthermore, numerous other policies within the 2040 Comprehensive Plan—spanning Land Use, Transportation, Housing, and the Parks, Recreation, and Open Spaces chapters—reinforce the incompatibility of the proposed facility with the city’s long-term vision. While these policies may not reference this site explicitly, they collectively establish a framework that prioritizes pedestrian-friendly, mixed-use redevelopment and environmental stewardship—principles that stand in direct contrast to the proposed industrial use.

- Land Use Policy LU-1: *Encourage transit-supportive density and direct the majority of growth to areas with the highest existing or planned transit capacity.*
- Land Use Policy LU-2: *Pursue redevelopment of Opportunity Sites (generally sites larger than one acre) as higher-density mixed-use development or employment centers.*
- Land Use Policy LU-4: *Invest in measures that minimize displacement in neighborhoods where the proximity to high-frequency transit has increased redevelopment pressure and/or housing costs.*

560 Randolph Avenue, located within the Randolph-W. 7th/Schmidt Neighborhood Node, is a 4.27-acre site that aligns with multiple key land use policies in the 2040 Comprehensive Plan. Land Use Policy LU-1 encourages transit-supportive density and directs growth to areas with high existing or planned transit capacity. This site, with its proximity to a vibrant community node, transit access, parkways, and a river valley view, is ideal for residential development, not industrial use. Land Use Policy LU-2 prioritizes the redevelopment of sites over one acre for higher-density mixed-use development or employment centers, making 560 Randolph an optimal candidate for such transformation. Additionally, Land Use Policy LU-4 calls for minimizing displacement in neighborhoods experiencing redevelopment pressure and rising housing costs. As West 7th is set to benefit from planned transit investments, this site presents a prime opportunity to build new housing, particularly multi-family and mixed-use development, which the community supports. Instead of contributing to displacement through the demolition of historic working-class and immigrant-built homes, the city should focus on redeveloping underutilized properties like 560 Randolph, ensuring alignment with transit-oriented growth and community stability.



Figure 9: 2040 Comprehensive Plan Map of planned and potential transit ways

- Land Use Policy LU-21. *Identify, preserve, protect and, where possible, restore natural resources and habitat throughout the city*

The city's adopted land use policies emphasize protecting natural resources and sensitive environmental areas, particularly along the Mississippi River corridor. Placing a high-impact industrial facility—with a 4.67-acre parking lot for trash trucks and a CNG refueling station—within 1,200 feet of the river and 800 feet of a floodplain forest directly contradicts these priorities. This development would introduce increased stormwater runoff, vehicle emissions, and potential hazardous waste byproducts, all of which pose environmental risks to the river ecosystem and surrounding green space.

Furthermore, the 2024 Comprehensive Plan places significant focus on Neighborhood Nodes, which includes Randolph-W. 7th/Schmidt Intersection and the area that encompasses the proposed FCC site.

- Land Use Policy LU-30. *Focus growth at Neighborhood Nodes using the following principles:*
 - Increase density toward the center of the node and transition in scale to surrounding land uses.*
 - Prioritize pedestrian-friendly urban design and infrastructure that emphasizes pedestrian safety.*
 - Cluster neighborhood amenities to create a vibrant critical mass.*

(d) Improve access to jobs by prioritizing development with high job density.

This site serves as a gateway to West 7th's historic and evolving commercial corridor, making its use especially important in shaping the neighborhood's future. Placing an industrial truck yard here directly contradicts the city's stated goals for neighborhood development. A trash truck dispatching facility is not a community amenity—it is a significant detractor from residents' quality of life.

Using valuable land within a designated Neighborhood Node to store and refuel trash trucks is a missed opportunity for higher-density housing and mixed-use development at a key transit hub. The 2040 Comprehensive Plan prioritizes walkable, pedestrian-friendly urban design, particularly in Neighborhood Nodes like Randolph-W. 7th/Schmidt, where accessibility, safety, and connectivity between homes, businesses, and transit are essential. However, the FCC facility would introduce high-volume industrial traffic, increasing safety hazards, noise, and air pollution, making the area less safe and less accessible for pedestrians and cyclists. Instead of fostering a vibrant, walkable district, this development would undermine the city's investments in pedestrian infrastructure and transit accessibility, limiting the area's long-term potential.

- Land Use Policy LU-31. *Invest in Neighborhood Nodes to achieve development that enables people to meet their daily needs within walking distance and improves equitable access to amenities, retail and services.*
- Land Use Policy LU-32. *Establish or enhance open space close to Neighborhood Nodes, such as public parks, publicly-accessible private open spaces, and school playgrounds.*
- Land Use Policy LU-33. *Promote amenities that support those who live and work in Neighborhood Nodes, including frequent transit service, vibrant business districts, a range of housing choices, and neighborhood-scale civic and institutional uses such as schools, libraries and recreation facilities.*

The proposed industrial trash truck facility at 560 Randolph Avenue directly contradicts key principles outlined in the 2040 Comprehensive Plan. Land Use Policy LU-31 calls for investments in Neighborhood Nodes that provide equitable access to amenities, retail, and services, yet this development fails to offer any of these benefits, burdening the West 7th neighborhood without contributing to its vibrancy. Similarly, Land Use Policy LU-32 promotes enhancing open space near Neighborhood Nodes, but this facility will only detract from nearby parkland, making access to the river and surrounding green spaces more difficult and dangerous. Furthermore, Land Use Policy LU-33 encourages amenities that support residents and workers, such as transit service, vibrant business districts, and diverse housing options, none of which this facility provides. Instead of contributing to the neighborhood's growth and well-being, this development undermines existing resources and opportunities for revitalization in the area.



Figure 10: 2040 Comprehensive Plan map of neighborhood nodes and proposed FCC site

- Transportation Policy T-33. *Improve pedestrian and recreational connections to the Mississippi River.*

Policy T-33 of the 2040 Comprehensive Plan calls for improving pedestrian and recreational connections to the Mississippi River. However, Randolph Avenue—a primary route to the river—is already a high-volume roadway in failing condition, with significant areas missing sidewalks on both sides of the street and no bike lanes between West 7th and Shepard Road. The introduction of dozens of heavy industrial trucks making daily trips to and from the FCC site would make conditions even more dangerous for pedestrians and cyclists. Rather than strengthening pedestrian connections to the river, this development would further isolate the neighborhood from its waterfront.

Goal 5: Sustainable and equitable maintenance models.

- Transportation Policy T-38. *Reduce the number of heavy vehicle trips on local streets through measures such as consolidation, coordination and route designation/planning, in order to reduce maintenance costs.*

Goal 7: Functional and attractive Parkways.

- Transportation Policy T-41. *Maximize space for recreation and landscaping uses within Parkway rights-of-way, and prioritize recreation and landscaping in Parkway design in order to maintain a park-like feel, particularly on the Grand Round.*

The proposed FCC trash truck facility contradicts several key goals and policies aimed at creating a more sustainable, equitable, and functional community. Goal 5, which focuses on sustainable and equitable maintenance models, is undermined by the proposed development, as Transportation Policy T-38 seeks to reduce the number of heavy vehicle trips on local streets. With up to 80 garbage trucks per day running through a designated Neighborhood Node, this industrial facility directly contradicts the goal of minimizing local street maintenance costs. Similarly, Goal 7 aims to preserve and enhance functional and attractive parkways, while Transportation Policy T-41 emphasizes maximizing space for recreation and landscaping within Parkway rights-of-way, particularly along the Grand Round. The proposed FCC facility, situated immediately adjacent to the Grand Round, introduces a heavy industrial use with high-volume truck traffic, directly undermining efforts to maintain a park-like feel and prioritize recreational space in this critical area.

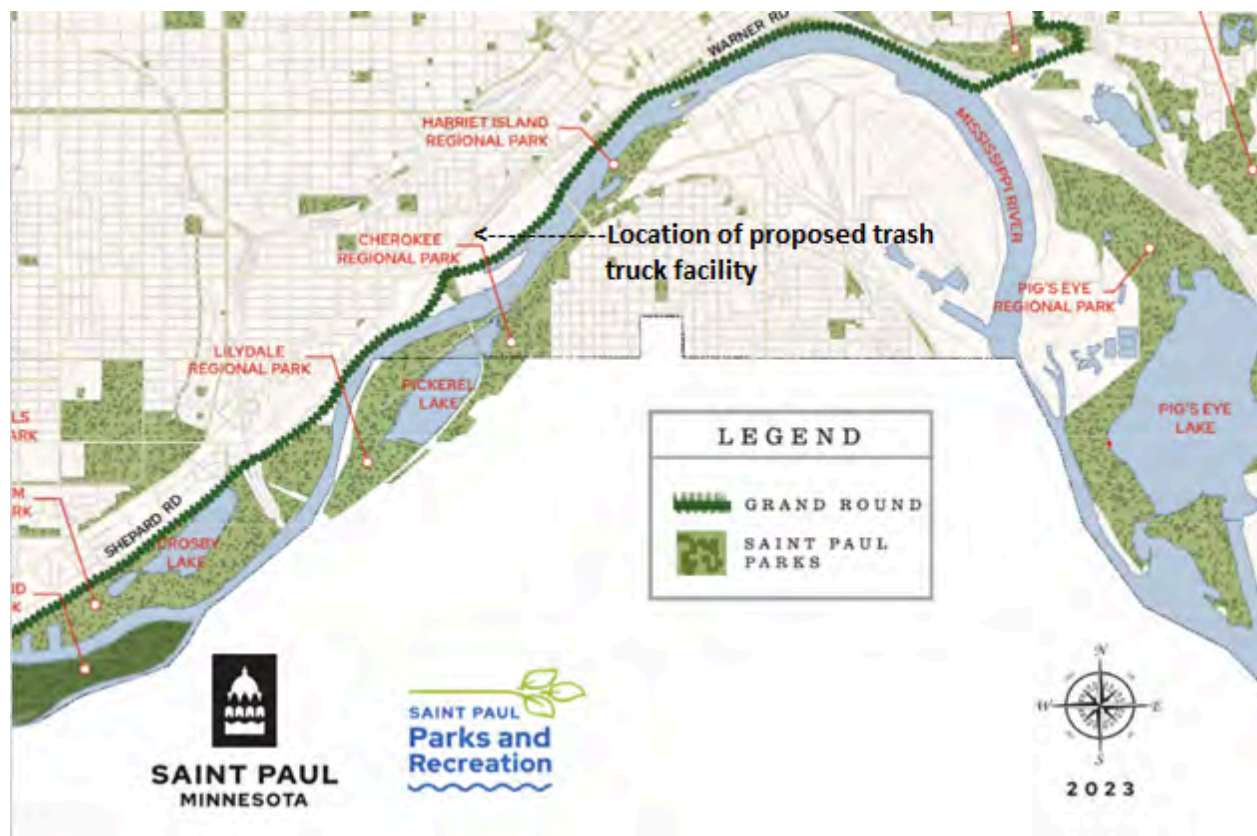


Figure 11: Map of the Grand Round scenic byway through St. Paul

- Parks and Recreation-Policy 44: *Support facility improvements that better connect neighborhoods to the Mississippi River.*

Parks and Recreation Policy 44 emphasizes the importance of supporting facility improvements that better connect neighborhoods to the Mississippi River. However, locating a trash truck facility along one of the neighborhood's only access points to the river directly contradicts this policy. Rather than improving connectivity, this facility would exacerbate the existing disconnect

between our neighborhood and the river, blocking access, disrupting the natural landscape, and hindering the community's ability to engage with this vital resource. The proposed development undermines the intent of this policy, which aims to strengthen ties between the neighborhood and the river, not further isolate them.

While no single development can align perfectly with every policy in the 2040 Comprehensive Plan, the weight of the policies and adopted plans overwhelmingly support granting this appeal. The determination that FCC's proposed use is consistent with the Comprehensive Plan is based on a narrow interpretation that prioritizes one section of the Future Land Use Map while disregarding numerous conflicting policies, other maps, and formally adopted addenda. The Great River Passage Plan, Mississippi River Corridor Plan, and Fort Road Development Plan provide clear, forward-looking guidance that envisions this site transitioning to mixed-use or residential development. By approving FCC's industrial facility, the city would not only entrench the existing industrial character of the site but also actively obstruct the realization of its own long-term planning goals. The City Council has an opportunity to correct this misalignment, uphold the integrity of the Comprehensive Plan as a whole, and ensure that land use decisions reflect the broader vision for sustainable, transit-oriented, and pedestrian-friendly development at this critical neighborhood node.

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

The proposed development at 560 Randolph fails to meet the requirement to preserve unique geologic, geographic, and historically significant characteristics, as well as to protect environmentally sensitive areas. While this parcel may not carry a formal historic designation, multiple sources—including community members and local historians—have raised serious concerns that the site sits above or adjacent to Fountain Cave, a landmark of early Saint Paul history and one of the city's most significant lost natural features. Fountain Cave was a central destination in early tourism and exploration of the Mississippi River and remains part of the city's historical identity.

In addition, this property lies within the Mississippi River Critical Overlay District, a designation that calls for heightened environmental scrutiny due to the site's proximity to the river and its impact on water quality and habitat. It has been reported that stormwater from this site drains directly into Fountain Cave and ultimately into the Mississippi River, with limited or no stormwater filtration or treatment.

The proposed use—a waste hauling depot—introduces a high volume of garbage trucks and industrial vehicles, which are known to carry pollutants such as oil, grease, brake dust, road salts, and leachate. These contaminants inevitably accumulate on site and are washed into the stormwater system during rain and snowmelt events. Without robust containment and treatment systems, these substances are likely to reach the cave and river, posing a risk to groundwater,

aquatic life, and downstream communities. This is especially concerning given the unique subsurface geology of the area, where karst formations and underground channels can rapidly carry pollutants long distances with minimal natural filtration.

In short, the combination of historic and geologic sensitivity, along with the risk of stormwater contamination in a Mississippi River Critical Area, demands far greater environmental diligence than this site plan reflects. The City should not approve the project without a full environmental review and clear evidence that these critical features will be identified, preserved, and protected.

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.

While it may be true that compressed natural gas (CNG) trucks produce fewer emissions and less noise compared to traditional diesel vehicles, these relative improvements do not negate the fundamental issue: West 7th is being asked to accept a level of industrial activity that this site—and this corridor—has never seen before, solely to serve the city's broader waste collection needs. We did not previously have over 36 garbage trucks originating from a centralized facility in our neighborhood every day — regardless of their fuel type.

The staff report itself states that CNG trucks offer only a 20% reduction in greenhouse gas emissions compared to diesel, and it's important to note that not all of FCC's fleet is even CNG-powered. The claim of environmental benefit is therefore overstated. A slightly cleaner garbage truck is still a garbage truck, and 36 or more of them represent a major daily increase in heavy vehicle traffic. These trucks will navigate through residential and mixed-use parts of West 7th, where streets are already narrow, often poorly maintained, and lack basic pedestrian safety features. This raises serious concerns about pollution, traffic congestion, and safety—especially for children, cyclists, and transit users.

We have gotten a preview of FCC's operations at this site. Many drivers are using a "cut-through" through the historic brewery district on Webster Street. Residents don't have access to FCC Dispatch and GPS data that would show how many trucks are travelling by that route because FCC is a limited liability company not subject to provisions of the Minnesota Data Practices Act. If it was actually a public works yard, residents would be able to access such city data and with it could request a route change through an appeal to the Mayor or City Council.

Moreover, the facility is expected to generate additional employee traffic, further increasing the transportation burden on local roads. And for what long-term benefit? By siting a high-intensity waste facility at 560 Randolph, the City is not just adding short-term traffic and disruption—it is locking in an industrial use that will stunt any future reinvestment or redevelopment along this key corridor. The presence of a large-scale garbage facility sends a clear signal to other property owners and potential developers: this is not a corridor for housing, mixed-use

development, or neighborhood-scale retail. The opportunity cost is enormous—lost potential for housing density, walkable streets, business growth, and sustainable tax revenue for Saint Paul.

This proposal sacrifices the future of Randolph Avenue to solve a present-day problem, and in doing so, it burdens a historically underserved neighborhood with long-term negative impacts. West 7th is not a dumping ground for industrial solutions that other parts of the city would never accept. To frame this as a climate-forward investment while ignoring its inequitable siting and harmful land use consequences is disingenuous.

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.

While the staff report emphasizes technical compliance with site plan requirements and traffic engineering standards, it misses a crucial point: Randolph Avenue is far more than a collector road. For the West 7th community, it is the only direct access to the Mississippi River for the majority of our community— a cherished public resource and a defining feature of our neighborhood.

Critically, this gateway is already functioning without adequate safety infrastructure. There is currently no continuous sidewalk and no designated biking infrastructure along this stretch of Randolph — yet residents use it daily to access the river, Crosby Farm Regional Park, and adjacent trails. Neighbors utilize this dangerous roadway because there simply are no alternatives.

Adding a fleet of 36+ garbage trucks and dozens of employee vehicles to this corridor — entering and exiting the site during peak morning and afternoon hours — will only magnify the risks for those who rely on Randolph for non-motorized transportation. The site plan's modest proposal for infill sidewalk on one parcel does not resolve this deeper issue, nor does it address the need for safe, continuous multimodal connections along the corridor.

This isn't just about turning radii or curb cuts — it's about preserving and enhancing a critical community gateway that connects people to nature, recreation, and the river. Unlike Dale or Burgess Streets, which serve larger industrial zones with fewer residential impacts, Randolph Avenue passes directly through a mixed-use neighborhood already under strain from traffic, poor street conditions, and a lack of pedestrian safety measures.

A facility of this scale — serving the entire city's waste needs — belongs in an area already zoned and equipped to handle high-intensity, industrial traffic. It should not be sited at the expense of one of the West 7th community's most important, yet vulnerable, public connections.

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

In email correspondence between a community member and the Civil Engineer for FCC, Mr. Knaeble notes they could not find a sanitary sewer connection from the building and indicates the building drains into a drain field (*April 7, 2025*). St. Paul City code seems to prohibit discharge of commercial sewage into drain fields.

FCC public submittals and statements have not yet addressed the amount of sanitary sewage water that will be discharged from washing the 30 refuse trucks presently in operation at 560 Randolph Ave, or in providing for their employee restrooms. From research, it would appear that a former sanitary sewer connection to the Met Council Environmental Services (MCES) W. 7th St. interceptor line that runs underground below the property was abandoned. More research is needed and more details need to be provided.

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 proposed site plan fails to adequately address erosion and sediment control, particularly in light of the significant environmental risks posed by the location. According to the Minnesota Pollution Control Agency's "Manual for Protecting Water Quality in Urban Areas," effective erosion and sediment control measures are essential to prevent harmful runoff from reaching nearby water sources. However, the plan fails to provide meaningful stormwater management solutions, particularly given that the stormwater at this site is proposed to drain directly into Fountain Cave and the Mississippi River with limited management.

Fountain Cave, a historically significant geologic feature in Saint Paul, is part of the same watershed as the Mississippi River, and stormwater runoff that reaches this cave carries contaminants that could directly pollute the river. Given that part of this area is already within the Mississippi Critical Overlay District, any development that increases impervious surfaces without robust stormwater management exacerbates the risk of pollution. The addition of multiple acres of asphalt from surface parking and fleet storage significantly worsens the runoff problem, increasing the amount of sediment and pollutants entering the stormwater system.

This site's design and proposed operations, including daily truck traffic and fleet movements, will further contribute to the accumulation of contaminants in the stormwater runoff. Garbage trucks, in particular, bring debris and pollutants that are carried by the runoff into the cave and eventually the river, which is unacceptable from an environmental perspective. While the erosion and sediment control requirements outlined in the city's guidelines may be technically met, the lack of meaningful stormwater management that adequately mitigates the

contamination risks to the river, cave, and surrounding environment highlights a critical gap in the proposed plan.

To meet both the letter and spirit of the criteria, the city must require far more comprehensive stormwater management strategies that address the long-term environmental health of the Mississippi River, reduce pollutants entering the watershed, and protect sensitive geologic features like Fountain Cave from further degradation.

Conclusion

The proposed site plan for 560 Randolph Avenue fails to meet multiple core criteria under Saint Paul's site plan review ordinance and directly contradicts the city's own adopted planning documents. It would entrench an incompatible industrial use in a location long identified for mixed-use and residential redevelopment, undermining the city's goals for environmental stewardship, neighborhood connectivity, and equitable river access. The plan disregards the intent and guidance of the 2040 Comprehensive Plan and its key addenda, while introducing significant safety, livability, and infrastructure concerns.

In particular, the absence of clear and legally compliant plans for sanitary sewage disposal, and the inadequate attention to stormwater management in a Mississippi River Critical Overlay District, raise serious environmental and public health risks. These unresolved issues alone warrant a more thorough environmental review—and further highlight the inappropriateness of siting a high-intensity waste facility in this location.

This site plan does not reflect the values, priorities, or vision the city has committed to through years of planning and community engagement. We urge the Zoning Committee to recommend **denial of the site plan** and reaffirm its commitment to long-term, sustainable, and community-centered development in the West 7th neighborhood and throughout Saint Paul.

From: [J B](#)
To: [*CI-StPaul_ZoningCases](#)
Cc: julia@fortroadfederation.org
Subject: Please move forward with trash plan at the W 7th site, FILE # 25-015-397
Date: Thursday, April 3, 2025 11:36:25 AM

You don't often get email from jjblas104@gmail.com. [Learn why this is important](#)

Hello,

My name is James Blaschko and I am a Saint Paul resident at 241 Robie St W. I am writing to express my support of the trash plan which would have the FCC trash truck facility at the W 7th location.

My understanding is that the plan does in fact conform to the zoning that has been set out for the area, but that some community members just don't like it. That's frustrating for those community members, but setting the precedent that the city will change plans and pull the rug out from under local businesses at the whims of a minority of residents is worrying.

Please move forward with the plan.

thank you,

James Blaschko

From: [Brendan Harris](#)
To: [*CI-StPaul_ZoningCases](#)
Subject: Public comment
Date: Monday, April 21, 2025 7:03:26 PM

You don't often get email from harris.brendan13@gmail.com. [Learn why this is important](#)

FILE # 25-015-397

Name: Brendan Harris

Address: 286 w Forbes Ave 55102

Nobody, including myself and my partner, wants an industrial trash truck facility in our community. This issue extends beyond a single site. Long-term planning, community trust, and the future of river- and transit-oriented development need to be considered with the opinion of the locals and not the city as a whole. Our story matters, and by sharing my personal perspective should be considered as a powerful insight as to what myself and my fellow neighbors want in our community.

Thanks for your time,

- Brendan Harris

From: [Joe landsberger](#)
To: [*CI-StPaul_ZoningCases](#)
Cc: ["Julia McColley"](#)
Subject: # 25-015-397
Date: Monday, April 21, 2025 3:51:18 PM

You don't often get email from joe@josfland.com. [Learn why this is important](#)

Thank you for accepting and considering my written testimony regarding FCC's trash truck fueling facility at 560 Randolph Avenue.

My testimony includes three letters to the editor published in the Pioneer Press, Minneapolis Star Tribune, and MyVillager:

Saint Paul City Council Hearing 3/8/2025

Trust

It seems that trust is lacking on multiple levels of government including our city's. We in the West End are familiar historically with the lack of trust and marginalization of our neighborhoods. In the 1920s Police Chief O'Connor supported crime bosses while his wife acted as madam of local prostitutes. Until the 1930s we were recipients of human and industrial waste that clogged the Mississippi. In the 1950s Shepard Road destroyed our bluffs. In the 1960s the city removed a river-edge neighborhood and brought in a scrapyard that took twenty years to remove. Ten years ago 3,000 neighbors signed a petition opposing streetcars on Seventh. It took ten years, but we succeeded. So how many years will it take to remove garbage trucks from same?

Ruby Hunt who passed this December and was the daughter of a Russian immigrant, championed local district Council elections hopefully providing voice to neighborhood constituents. Opposing streetcars I was not allowed in two public meetings, not because I was contentious, but that my easel presented an alternative. The Planning Commission did not include our testimony in their deliberations, and Public Works lobbied with FCC in corridors and behind closed doors precluding district input. We in the West End are not alone facing the lack of trust within neighborhoods. Will you reestablish trust and support the Federation?

Strib Editor 3/27/2025

On March 19, our St. Paul City Council voted unanimously to block our Planning Commission's decision to locate a garbage truck dispatch center at 560 Randolph Av. on the bluff of the Mississippi River: garage trucks with million-dollar views. The process of locating the garbage center was a backdoor deal negotiated by our Department of Public Works without input from our neighborhood council, the West 7th/Fort Road Federation-District 9 Community Council.

The council was informed only after the agreement was signed despite multiple efforts to engage in the process. With the city's legal team at her side, Council Member Rebecca Noecker's careful reason and elegant rationale supported our appeal to block

the garbage transit center based upon a number of factors. At the council hearing 20+ citizens testified. One glaring presentation demonstrated that the city stood to lose more than \$2 million per year in property tax revenue if the bluff site became industrial rather than residential. Another showed that industrial use conflicted with the Great River Passage Master Plan and our Comprehensive Plan that was adopted by the City Council in 2013 upon the recommendation of the Planning Commission.

Noecker further stated that trash collection is already underway without the Randolph location and will not be interrupted. However, Mayor Melvin Carter threatened the council and the neighborhood with an emergency declaration that has no merit, nor urgency.

Randolph Avenue at Shepard Road is a critical urban commercial, residential and transit node, the downtown of the West End. Perched on its bluff, it adjoins the historic Schmidt Brewery, on the National Register of Historic Places since 2018. Eighty garbage trucks daily in and out of our narrow corridor would not fit, especially when alternative industrial sites are available.

Pioneer Press 3/21

I strongly object to the mayor's take on the city council supporting the Fort Road Federation/District 9 Community Council's appeal that took issue with city zoning administrator and planning commission findings. With the city's legal team at her side, Councilwoman Noecker's carefully reasoned and elegant rationale, that the council unanimously approved, was based upon a number of factors, not just the interpretation a public works yard. The mayor has ignored decades of (local) community input on the care for our environment and possibilities for both commercial and transit viability, specifically for our beautiful river corridor. He also ignored the testimony of his constituents that objected not only to what would have been its impending destruction, but also the potential loss of residential property tax income. A number of alternative sites could have been considered, and what is worse our community was given a *fait accompli*, specifically excluded from decision making on locating this garbage truck dispatch center. The mayor has fabricated a "crisis" where not exists: an alternative dispatch center already is in operation and will be for expanded service. I would like to encourage the mayor and his staff to read his citizens' testimonies, even join us in a conversation on the issues we presented. Will he? I doubt it.

MyVilager 4/1/2025

Impoverishment of our City

St. Paul's, or rather should I say Mayor Carter's, recent declaration of an emergency reflects two important points: the current vogue of by-passing legislation on the federal level (Trump) making such declarations. The second, just as serious, is the impoverishment of our city's financial health and lack of

vision. Quite frankly the emergency did not exist. FCC Environmental was on track to pick up garbage given months of planning. Along with Sean Kershaw, Director of Public Works, the mayor worked out a back room deal to use 560 Randolph on our river's bluff for a central dispatch yard. For months they denied the Federation, our neighborhood district council, neighbors, and even Rebecca Noecker our City Councilwoman any information on negotiation until a deal was signed. They then withheld testimony from the Planning Commission as they rubberstamped the agreement.

One might ask why this "wisdom" of bureaucrats is so awful? Because years of city-approved planning for housing and transit along this same bluff would have brought millions more in annual property tax income on the site than if it is used industrially. It also could enhance its place in the Mississippi National River and Recreation Area.

Back to impoverishment. Currently our mayor is suffering from a lack of vision to revitalize our downtown, and also the neighborhoods that will feed its restoration. West Seventh is a prime example. We were a catalyst to the founding of our state not to mention city. Yet these same bureaucrats have often been adversaries rather than advocates to its wellbeing. Up through the 1930s raw sewage, human and industrial waste, was dumped into the Mississippi River depleting it of oxygen and any flow. In the 1950s whole neighborhoods were removed along this same river to build Shepard Road to promote white flight out of the city, destroying neighborhood access to the river and Fountain Cave. The 1960s witnessed Little Italy replaced with Kaplan's Scrap Yard that took twenty years for these same bureaucrats to realize the river's beauty could be an asset.

In the 1970s, our neighborhood council, the Federation, and a cadre of volunteers swung into action to rescue our "inner city". We allied with other councils to fight 35E. We saved Irvine Park, Kipps Glenn and the C.S.P.S. Hall from demolition, and saved the Schmidt Brewery complex as a historic site. We advocated for public housing at Sherman Forbes and community centers at Oneida and Palace, saved the local school (Monroe) and founded our local library and community newspaper. The Federation became a model for the district council system in the early 1970s. They established a Community Development Corporation (CDC) that rehabilitated stressed housing with a homesteading requirement and brought millions in investment to the oldest housing (and commercial structures) in our state. We partnered with Hazelden Foundation (2014) and Peter King Health Facility (2009), the latter out of the Helping Hand Clinics (1972). We developed the North High Bridge Park and

Sculpture Garden at no cost to the city. And we successfully fought the brothels.

I have reminded Kershaw of the mission statement of the Citizens League that he headed before Public Works: “The Citizens League is a nonpartisan, nonprofit organization that empowers people to engage in civic life and public policy to make Minnesota a better place to live and work for everyone.” The examples of the Federation will perhaps validate that mission and hopefully encourage “downtown” to dialogue. With neighborhoods.

joe //////////// **educationally inclined** \\\\\\\\\\\\\\\\\\\

Wisdom to discern the right path

Courage to take it

Discipline of joy to encounter it

jos f landsberger; <mailto:joe@josfland.com>

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From: Kim Hyers <kimhyers@icloud.com>
Sent: Wednesday, March 19, 2025 2:55 PM
To: fortroadfed@fortroadfederation.org; #CI-StPaul_Ward2 <Ward2@ci.stpaul.mn.us>; *CI-StPaul_ZoningCases <ZoningCases@ci.stpaul.mn.us>
Cc: 'Meg Duhr' <megduhr@gmail.com>; darrent tobolt <darrentobolt@gmail.com>
Subject: Opposition to the Proposed Garbage Truck Facility at 560 Randolph Ave. A Missed Opportunity for Riverfront Development

Dear St. Paul Planning and Economic Development, Fort Road Federation and Councilmember Noecker,

I am writing to express my concern over the proposed use of the riverfront parcel at 560 Randolph Avenue for a garbage truck facility. This site represents some of the most valuable and developable land remaining in St. Paul, with direct views of the Mississippi River, proximity to existing parkways and bike paths, and adjacency to recent redevelopment projects such as the Schmitt Brewery artist housing. Allocating this prime real estate for industrial use not only undermines the city's long-term economic potential but also ignores the success that other cities including our neighbor Minneapolis have had in maximizing their riverfronts for residential, commercial, and public spaces. It does not add value to our neighborhood. In fact, it does the opposite for the Randolph community, and the city as a whole.

Across the country, cities that have invested in riverfront revitalization have seen substantial increases in tax revenue, economic development, and overall community well-being. Studies show that mixed-use developments featuring a blend of residential, retail, and commercial spaces generate significantly higher tax revenue than industrial uses. For example, research from Smart Growth America demonstrates that compact, walkable developments can produce **up to ten times more tax revenue per acre** than industrial or low-density suburban developments. Similarly, a fiscal analysis in Falls Church, Virginia, found that mixed-use development yielded median net tax revenues of over \$307,000 per acre annually, while traditional industrial uses produced a fraction of that amount. By dedicating the 560 Randolph Ave parcel to a low-value municipal facility, the city would be forfeiting millions in potential long-term tax revenue.

Comparison: Minneapolis vs. St. Paul Riverfront Development

Feature	Minneapolis (Central Riverfront)	St. Paul (560 Randolph Proposal)
Use of Riverfront	Parks, trails, museums, housing	Industrial (garbage truck site)
Public Access	Extensive parks, trails, and event spaces	Limited to nearby trails
Economic Impact	High property values, tourism, business growth	Low-value municipal facility
Cultural Investment	Guthrie Theater, Mill City Museum, Stone Arch Bridge	No planned cultural spaces

Closer to home, a study looking at Lake Street land use in Minneapolis found that big block development by a single user is far less economically beneficial, and in this case, they at least provided a retail amenity, a garbage station does nothing for us in this location. Tax comparisons note that the local taco shop proportionally delivered far more revenue per acre than the Target.

Additionally, industrial uses are often better suited to locations where land values are lower, infrastructure is designed for heavier equipment, and the negative externalities such as noise, odor, and heavy truck traffic do not detract from surrounding public and private investment. With the bike trails, dog park and other amenities near that intersection, safety is also a major concern.

St. Paul's own land use states this is NOT the right use for this property. Randolph/W7th is specifically called out in the planning guide as a Neighborhood Node. Nothing in the planning supports putting an industrial garbage facility here.

Policy LU-1. Encourage transit-supportive density and direct the majority of growth to areas with the highest existing or planned transit capacity.

Policy LU-2. Pursue redevelopment of Opportunity Sites (generally sites larger than one acre identified as having potential for redevelopment) as higher-density mixed-use development or employment centers with increased full-time living wage job intensity, and the appropriate location for community services that are completely absent in the surrounding area (Map LU-3).

Policy LU-9. Promote high-quality urban design that supports pedestrian friendliness and a healthy environment, and enhances the public realm.

Policy LU-10. Activate streetscapes with active first-floor uses, street trees, public art, outdoor commercial uses and other uses that contribute to a vibrant street life.

Policy LU-18. Support facilities outside public rights-of-way to support pedestrian and bicycling activity, such as sidewalk access to building entrances, adequate lighting, trails and bicycle parking/storage.

Policy LU-19. Prioritize measures to achieve a long-term increase in canopy coverage citywide, with general goals of 40% tree canopy coverage in all neighborhoods outside of downtown and 15% downtown.

Policy LU-23. Strengthen neighborhood connections to and within Downtown Saint Paul through development and improvements that support and complement

The City of St. Paul should be actively seeking alternative locations for the garbage truck facility in less economically valuable or non-developable areas, **rather than sacrificing one of its last prime riverfront parcels for a use that provides minimal economic or community benefit.**

There are ample industrial zones within the city and surrounding suburbs that would be far better suited for this purpose.

St. Paul has an opportunity to follow the lead of cities like Minneapolis, Columbus, and Nashville, which have transformed their riverfronts into thriving economic engines. I urge you to reconsider this plan and explore alternatives that would better serve the long-term interests of the city, its residents, and its economy to drive housing, tourism, retail and tax revenue opportunities.

Thank you for your time and consideration.

Sincerely,
Kim Hyers
234 Colborne Street
St. Paul, MN 55102
651-216-9551

Sources:

• Smart Growth America, Building Better Budgets: A National Examination of the Fiscal Benefits of Smart Growth Development, 2013 (smartgrowthamerica.org)

• Strong Towns, The Relationship Between Retail Tax and Property Tax, 2018 (strongtowns.org)

• City of Falls Church, VA, Mixed-Use Development Fiscal Impact Report, 2017 (choosefallschurch.org)

• Planetizen, Tax Revenue Comparison of Downtown Development vs. Suburban/Industrial, 2012 (planetizen.com)

From: mjt@mjtaylor.net
To: [*CI-StPaul_ZoningCases](#)
Cc: [Rebecca Noecker](#); [Jaime Tincher](#); [Nicolle Newton](#); [Sean Kershaw](#); megduhr@gmail.com
Subject: Proposed Trash Truck Facility at 560 Randolph Ave.: FILE # 25-015-397
Date: Tuesday, April 1, 2025 2:30:53 PM

You don't often get email from mjt@mjtaylor.net. [Learn why this is important](#)

Dear Members of the Zoning Committee,

My name is Marilyn Taylor, and I live at 336 Michigan St. I am writing to express my strong opposition to the proposed trash truck facility at 560 Randolph Avenue. This project conflicts with city-adopted plans, sacrifices valuable redevelopment opportunities, and threatens the livability of the West 7th neighborhood.

Key Concerns:

1. Inconsistency with City Plans:

City-adopted plans like the *Mississippi River Corridor Plan* and *Great River Passage Plan* emphasize mixed-use redevelopment, public green space, and improved access to the riverfront. The proposed FCC Environmental Services facility is entirely at odds with this vision.

2. Lost Redevelopment Potential:

This site has long been identified as a critical opportunity for **housing**, public spaces, and pedestrian-friendly development. Allowing this development would undermine years of planning and public input, permanently forfeiting the chance to realize the community's vision.

3. Negative Impacts on Livability:

The daily operations of up to 80 garbage trucks (the number of trucks FCC GM Greg Revering stated would comfortably fit on this lot) would bring increased noise, pollution, and traffic to the area, creating safety risks for pedestrians and cyclists. This would degrade the quality of life for residents and hinder efforts to build a vibrant, connected neighborhood.

This site is a gateway to West 7th, borders a historic district and the river, and deserves thoughtful development that reflects our shared priorities. Please protect our neighborhood and its future.

Sincerely,
Marilynn Taylor
336 Michigan St.
Saint Paul MN 55102
651-770-0250

From: mjt@mjtaylor.net
To: [*CI-StPaul_ZoningCases](#)
Cc: julia@fortroadfederation.org
Subject: File # 25-015-397
Date: Tuesday, April 22, 2025 10:04:29 AM

You don't often get email from mjt@mjtaylor.net. [Learn why this is important](#)

I am writing to urge the Zoning Committee to recommend denial of the site plan proposed for 560 Randolph Avenue and reaffirm its commitment to long-term, sustainable, and community-centered development in the West 7th neighborhood.

The proposal to use 560 Randolph fails to meet multiple core criteria under Saint Paul's site plan review ordinance and contradicts the intent and guidance of the city's 2040 Comprehensive Plan and its key addenda, while creating serious safety, livability, and infrastructure concerns.

This site plan does not reflect the values, priorities, or vision the city has committed to through years of planning and community engagement and should be denied.

Sincerely,
Marilynn J. Taylor
336 Michigan St.

From: [Naomi Austin](#)
To: [*CI-StPaul_ZoningCases](#)
Subject: Fie # 25-015-397
Date: Tuesday, April 22, 2025 7:28:33 AM

You don't often get email from austinhegnauer@gmail.com. [Learn why this is important](#)

My name is Naomi Austin. I live at 90 Garfield Street in the Little Bohemia neighborhood of West 7th Street.

As a resident of this neighborhood for the past seventeen years, I implore you to reject the site plan of the FCC, which allows the industrial trash truck facility to be at 560 Randolph Avenue.

Equating a privatized, multinational corporation with the City- run facility on Dale Street, is completely erroneous, and clearly not "similar use." The Dale Street facility sits in a large industrial site, near a railway transfer station, a cemetery, and Pierce Butler Route, a road used mostly for commuters and trucking. This is not in any way "similar" to West 7th Street, the fairly narrow, 150 year old main street of our residential neighborhood, which is full of homes, small businesses, and a great deal of pedestrian traffic.

The introduction of thirty, and possibly up to eighty garbage trucks daily traveling back and forth to the proposed facility (meaning up to 160 trips a day) will unreasonably affect the safety and convenience of both pedestrian and vehicle traffic. We are a walkable neighborhood with many small businesses, pubs and restaurants and homes.

Events at the Excel Energy Center often overflow into our neighborhood with additional car and foot traffic. Anyone who lives in the neighborhood can attest to the bottlenecks that occur from hockey games, whether professional or high school, rock concerts, even dog shows. The additional daily garbage truck traffic will only aggravate an already congested traffic situation.

The lack of loading docks for many businesses mean double parking is a common occurrence and the narrowing of Seventh Street that often occurs with heavy snow further affects traffic and pedestrian flow. And you want to add a daily fleet of garbage trucks to this mix?

Millions of dollars was spent on the redevelopment of the Schmidt Brewery site. A garbage facility as a next door neighbor does not protect this neighboring property and will greatly affect the outcome of the revival of The Keg and Case, which recent foreclosure and hopes of renewal is dependent on attracting new tenants and customers.

If the rebuild of West Seventh and introduction of BRT goes through, West Seventh traffic will be disrupted for years during construction. How will this affect the introduction of a daily garbage truck fleet?

The expectations of the West 7th community were that this site eventually would be developed in a manner that would support community needs, including mixed use housing and local businesses. It was also to greatly improve river access to the adjoining neighborhoods, which has been denied since the construction of Sheppard Road.

A determination of "similar use" is a betrayal of the West 7th community, and further weakens trust in local government. At the initial community meeting with FCC, we were told this site at 560 Randolph was the only available commercial site on the market, only to learn later it

was an off-market sale and there were other sites. The exclusion of key documents from the community and the Federation and the inaccuracies included in documents to the Planning Commission also lead to distrust. The complete disregard of the Great River Passage Plan, the Mississippi Corridor Plan and the City's Comprehensive Plan leads one to conclude that the City simply doesn't care. The Mayor's recent action only adds to this sense of betrayal.

What West 7th Street needs is what was promised - housing, river access, and a vibrant commercial corridor, not a multinational, privately owned garbage facility with a great view of the river.

Sincerely,
Naomi Austin
90 Garfield Street, 55102

From: [Nathan Zacharias](#)
To: [*CI-StPaul_ZoningCases](#)
Cc: [Julia McColley](#)
Subject: Nathan Zacharias Comment on # 25-015-397
Date: Monday, April 21, 2025 4:22:26 PM

You don't often get email from ndzacharias@gmail.com. [Learn why this is important](#)

Dear Committee Members,

I hope you will consider denying the site plan for 560 Randolph Ave.

I live nearby and am discouraged at the plan to build a garbage truck fueling facility on this parcel. This is not because I am selfish enough to think someone else's neighborhood should bear the burden of industrial facilities. Nor is it because I think that a refueling facility isn't necessary to the efficient collection of garbage across Saint Paul.

I simply think that it is short-sighted. You have likely heard from many people about how the site plan for 560 Randolph is incompatible with the 2040 Comprehensive Plan. I am in agreement. The point of such a plan is to collectively say, "this is our vision for the future of the city," and the vision within the plan specifically identifies this parcel for redevelopment and rezoning. There are numerous other neighborhood, city, and regional plans--Great River Passage Plan, Mississippi River Corridor Plan, Fort Road Development Plan, and the District 9 Small Area Plan--that also call out this parcel for redevelopment.

American cities have used the land near rivers for industrial purposes for over 200 years. Slowly, many of them have reversed this trend. Their leaders and community members have said that connecting neighborhoods to bodies of water is a priority. Saint Paul has said this. West 7th has said this. Connecting West 7th to the river through housing and mixed use development will have a much more positive impact on the city than a fueling facility. Furthermore, with the likely addition of transit improvements along West 7th, the intersection of West 7th and Randolph Ave will be an even busier hub for pedestrians. We must turn our eye to the future of the neighborhood and not just the immediate needs of trash collection.

Approving this site plan means closing the door on additional housing and new businesses for decades. I strongly urge you to consider the long-term ramifications of this decision.

Thank you for considering my perspective.

Nathan D. Zacharias
744 Juno Ave
Saint Paul, MN 55102
ndzacharias@gmail.com

From: maudalvl@gmail.com
To: [*CI-StPaul_ZoningCases](#)
Cc: julia@fortroadfederation.org
Subject: # 25-015-397
Date: Tuesday, April 22, 2025 12:01:19 PM

You don't often get email from maudalvl@gmail.com. [Learn why this is important](#)

Dear Members of the Zoning Committee,

I am resubmitting my previous letter sent in February to the zoning committee regarding the Proposed Trash Truck Facility at 560 Randolph because I understand that some of the input was missing or not forwarded to the various committees.

My name is Virginia Maudal, and I live at 407 Colborn Street. I am writing to express my strong opposition to the proposed garbage truck facility at 560 Randolph Avenue. This project threatens the livability of the West 7th neighborhood. The garbage truck refueling facility will have a detrimental impact on the neighborhood, drive down property values, and cause people to leave the West 7th area of St. Paul. It will also negatively reflect on the city of St. Paul as a city that doesn't understand the value of urban planning nor making smart decisions for its residents and therefore is not a city in which one wants to live. The garbage truck facility needs to be stopped and a more appropriate location for the refueling facility found.

Key Concerns:

1. **Inconsistency with City Plans:**

City-adopted plans like the *Mississippi River Corridor Plan* and *Great River Passage Plan* emphasize public green space and improved access to the riverfront. The proposed facility is entirely at odds with this vision.

2. **Lost Redevelopment Potential:**

This site has long been identified as a critical opportunity for **housing**, public spaces, and pedestrian-friendly development. This development undermines years of planning and public input and ignores the community's vision.

3. **Negative Impacts on Livability:**

The daily operations of up to 80 garbage trucks (the number of trucks FCC GM Greg Revering stated would comfortably fit on this lot) will bring increased noise, pollution, and traffic to the area and create safety hazards for pedestrians and cyclists. It will degrade the quality of life for residents and make the area one in which no one wants to live.

4. **Ignores and overlooks the value of the river and its potential to the city.**

This site is a gateway to West 7th, borders a historic district and the river, and deserves intelligent development that reflects our shared priorities. Please protect our neighborhood and its future.

Sincerely,
Virginia Maudal

From: maudalvl@gmail.com
To: [*CI-StPaul_ZoningCases](#)
Cc: julia@fortroadfederation.org
Subject: File # 25-015-397
Date: Tuesday, April 22, 2025 11:40:43 AM

You don't often get email from maudalvl@gmail.com. [Learn why this is important](#)

I agree with the Fort Road Federation Board's statement that Mayor Carter's actions and response to the West 7th community is disappointing. The community of West 7th does not want 30 to 90 garbage trucks rumbling through the streets every day disturbing our neighborhood, threatening our way of life, and lowering our property values. Allowing a trash truck refueling facility close to the city's invaluable river resource is a mistake. Our decision makers and elected officials should listen to the people whom they represent and align their decisions with the people's vision. Do not disregard the communities' time, effort and input. The zoning committee's decision to deny or approve the FCC's site plan will either secure the area for industrial use and condemn future residential use or it will reserve the area for future development that aligns with the Comprehensive Plan.

Regards,

Virginia Maudal

April 23, 2025

TO: Zoning Committee, City of St. Paul

FROM: Becky Yust
256 Goodrich Avenue, Saint Paul, MN 55102

RE: FCC facility site plan review, 560 Randolph Avenue

Safety for pedestrians and bicyclists on Randolph Avenue

Twice a day, 34 FCC garbage trucks currently enter and exit 560 Randolph. A morning run or bike ride for pleasure or to get to work via Randolph to Shepard Road/Mississippi River pathways is made less safe as one must try to avoid the FCC garbage trucks on a road that has no sidewalks, poorly maintained asphalt, and little lighting.

Based on the site plan submitted, it is not clear if any design principles to reduce criminal opportunities are employed. A CPTED (Crime Prevention Through Environmental Design) approach in the selection and placement of vegetation can enhance safety for the community members. Doing so would ensure a naturally safer environment to deter offenders.

Proximity of CNG fueling apparatus to residential and business properties (see Exhibit A)

The FCC facility requires a CNG (compressed natural gas) fueling apparatus to transfer fuel to the garbage trucks when they are on the site. Fueling with CNG is a hazardous use as it is under extreme pressure and could explode if exposed to heat. The CNG fueling apparatus is located in the northeast corner of the FCC site, less than 700 feet from neighborhood homes and businesses. In the event of a catastrophe, these structures, residents, and employees are at risk of harm, and loss of home and business for many months.

Additionally, the runoff from cleaning trucks every night (assuming they come back completely empty) can contaminate the Mississippi River. Fountain Cave, used by the Dakota for centuries and the site in 1838 of the first building in the future city of St. Paul is in the watershed of the FCC site. The limestone allows water to easily pass through to the cave and the Mississippi River. The cleaning of 34 trucks everyday risks pollution of the river.

FCC garbage truck traffic each morning (see Exhibit B)

Observational data gathered by a community member counted 34 FCC garbage trucks that left 560 Randolph at 7:00am on a weekday morning. The majority, 75% (25), drove west on Randolph to the intersection of West 7th, Osceola, and Randolph. From that point, they turned to the northeast on West 7th, continued west on Randolph, or turned to the southwest on West 7th. Only 26% (9) FCC garbage trucks drove east to Shepard Road. This represents a disproportionate impact on the thriving West 7th community compared to the rest of the city.

Randolph Avenue, in particular, is not equipped to handle 150 FCC garbage trucks a week. Each empty garbage truck can weigh an estimated 33,000 pounds. In one-week (6 days of operation, twice a day), that equals 10,000,000 (ten million) pounds on the section of Randolph Avenue between the site and West 7th. The wear and tear from the weight of the trucks, particularly on Randolph through the rest of the neighborhood, will require substantial investment in road repair and rebuilding, negating any potential property tax revenue desired by the city.

FCC garbage truck conflicts (see Exhibit C)

Garbage trucks are big. And, as shown in the upper photograph of Exhibit C, when turning east onto West 7th, the FCC garbage truck veered into the oncoming left turn lane on West 7th. When the photograph was taken, there was no vehicle in that lane, but the intersection is one of the most complicated in West 7th and an additional 25 trucks does not make the intersection safer.

In the lower photograph of Exhibit C, the FCC garbage trucks are barreling east on West 7th. The continuous parade of FCC garbage trucks compromises safety for pedestrians trying to cross West 7th to get to a bus stop and for bicyclists to be seen by the truck drivers.

Recently, the City of Saint Paul presented a new West 7th corridor transit plan to the neighborhood. Goals of the plan include, among others: improve safety, calm traffic; improve the pedestrian experience; and support economic development opportunities and thriving commercial activities. The significant number of FCC garbage trucks on West 7th is incompatible with the goals of the new transit plan. Traffic conflicts with FCC garbage trucks make pedestrians' experiences walking to bus stops less safe, and, because of the siting of FCC on Randolph, there will be no new residential development to support economic opportunities.

Summary

This is not the right location plan for the FCC operation. Many other sites were identified during previous citizen testimony with far better access to the grid system of streets in Saint Paul. No logistics professional would have selected this site, and for the reasons I have presented, this site plan should not be approved.

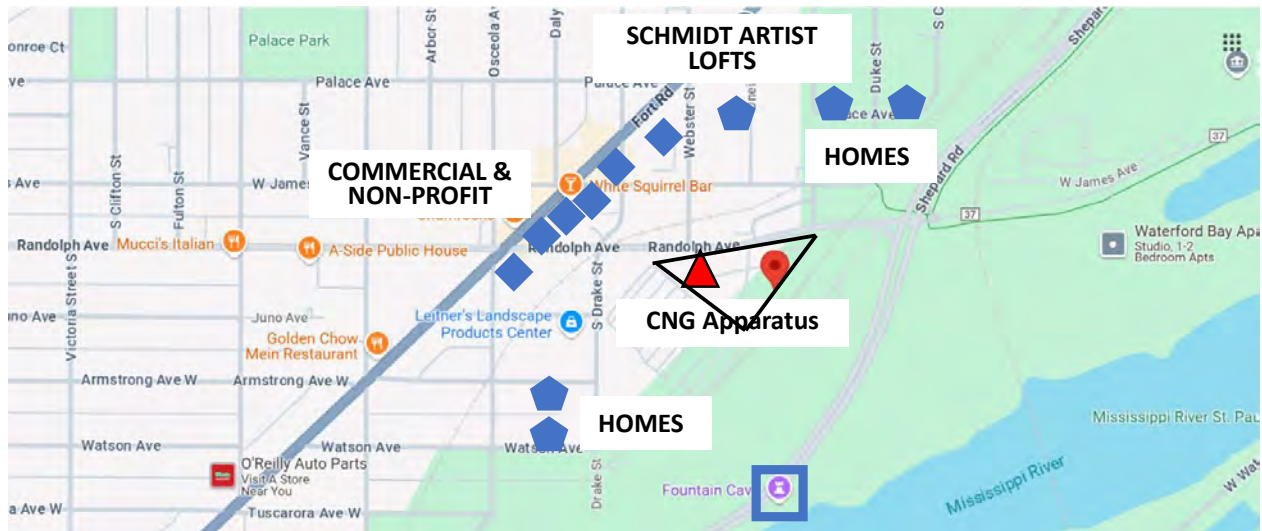
Attachments

Exhibit A: Proximity of CNG fueling apparatus to residential and commercial sites

Exhibit B: FCC garbage truck traffic at 7:00am

Exhibit C: FCC truck conflicts

Exhibit A: Proximity of CNG fueling apparatus to residential and commercial sites



KEY:

 FCC site boundaries

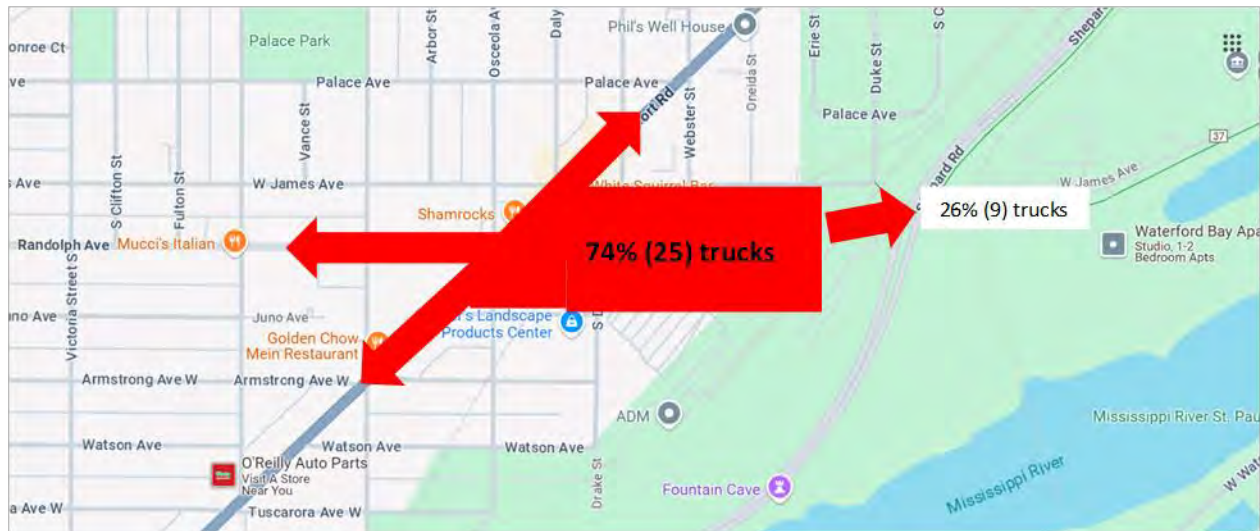
 Single family and multifamily affordable (Schmidt Artist Lofts) homes

 Riverland Community Health; St. Paul Fire Station #1; Jandrich Floral; White Squirrel Bar; Max it Pawn Shop; Keg & Case Market

 Fountain Cave – Dakota know it as IN-YAN TI-PI and were the first to use it. Pierre (Pig's Eye) Parrant built a cabin at the cave in 1838 and ran a bar for two years. This was the first building site in the future city of Saint Paul.

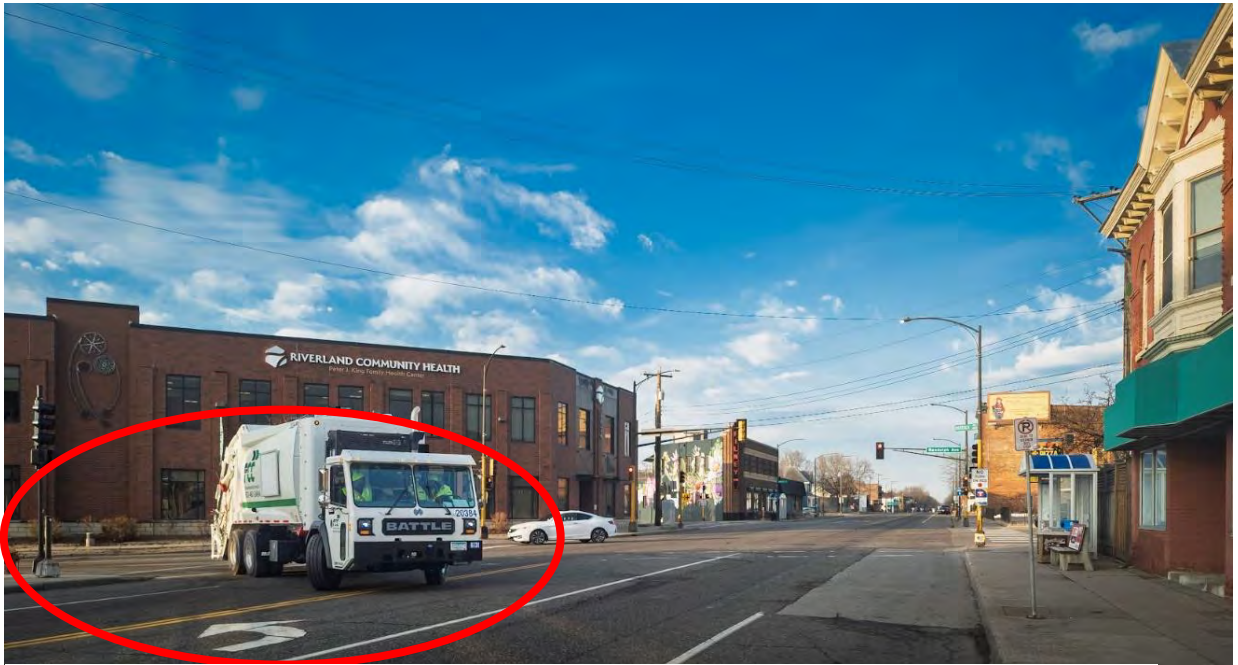
 Position of the compressed natural gas (CNG) fueling apparatus on the FCC site, less than 700 feet from residential and commercial properties

Exhibit B: FCC garbage truck traffic at 7:00am



FCC garbage trucks at 7:00am exiting site towards West 7th Street and Shepard Road. The majority, 74%, drive west on Randolph Avenue, directly into the West 7th neighborhood, equivalent to **150 garbage trucks every week coming into our neighborhood to serve the city.**

Exhibit C FCC truck conflicts



FCC garbage truck driving into the left turn lane on West 7th in order to make the acute right turn from Randolph Avenue to West 7th Street.



FCC garbage truck parade along West 7th Street, six times a week.

From: [John Purdy](#)
To: simon.taghioff@gmail.com; [*CI-StPaul_ZoningCases](#)
Cc: [Julia McColley](#); joe@josfland.com; [Rebecca Noecker](#); [Greg Brick](#)
Date: Wednesday, April 23, 2025 12:17:15 PM
Attachments: [RAILROAD VALUATION MAP 218CS1-1950286-v1.PDF](#)

Simon Taghioff – Chair Saint Paul Zoning Commission
Samantha Langer-Zoning Committee Secretary
25 West 4th Street
City Hall Annex
Suite 1400
Saint Paul, MN 55102

Dear Chair Taghioff, Zoning Secretary Langer and Zoning Committee Members,

Please accept and post my public comments for File 25-015-397 560 Randolph Ave. – FCC Site Plan Review.

FCC's submitted Plan G-001 indicates two (2) high-pressure storage vessels (equipment list items 9 and 10) while FCC's submitted April 22, 2025 letter (pg. 8) indicates that no compressed gas will be stored. Can the Zoning Committee determine which is correct?

On the same page of the April 22 letter, FCC states that noise created by three (3) seventy-five horsepower motors driving three (3) high-pressure compressors will be as quiet as a diesel truck at 15 feet. CNG compressors are known for making loud noise at a low HZ frequency which tends to carry for long distances. Can the Zoning Commission determine the actual noise emitting specifications for these three proposed high-pressure CNG compressors?

FCC's submitted Utility Plan C-4.0 notes that both sanitary and storm sewer connections are un-verified. FCC's April 22 letter (pg.'s 8 and 9) indicates that an abandoned drain field is located somewhere on the 560 site.

The attached MNDOT map (218CS1-1950286v1, circa 1919) identifies that the 560 site is connected to a combined storm/sanitary sewer tunnel. The tunnel is further documented by Dr. Greg Brick in [Ramsey Co. History, Vol. 29, No. 4](#).

FCC Utility Plan C-4.0 does not identify any sewer tunnel.

Can the Zoning Committee please determine where FCC's sanitary and storm water discharges are going now; and if such discharges are lawful? If the 560 site discharges remain un-verified, can the Zoning Committee lay over any determination of future use until the present sewer connections are known?

Can the Zoning Committee also request that Jim Brown, (SPPW Planning and Records) advise as to the existence, ownership, and recommendation for the sewer tunnel's future use?

Can the Zoning Committee please review Joe Lansberger's public comments submitted yesterday with care? Mr. Lansberger indicates that the FCC contract may have been negotiated without the authorization of the City Council.

If Mr. Lansberger is correct, then the City did not follow the statutory requirements of [Minn Statute 443.18](#) which reads, in pertinent part:

443.18 MAY HAVE GARBAGE PLANT IN FIRST CLASS CITY.

*Any city of the first class in the state, is hereby authorized ... to provide for the collection of all such garbage or refuse matter ...and to pay and **contract** to pay for the same in such annual installments and at such a rate of interest on deferred payments **as the council of the city may determine**. Each and every act and thing authorized by sections 443.18 and 443.19 shall receive **at least a three-fourths vote of all members of the council** before the same shall be effective for any purpose.*

A search of [Legistar](#) for years 2023-2025, using search term "FCC", produces one return, [RES 24-1651](#) which mentions FCC. But neither the Title nor Body speak to Council authorization of the FCC Contract.

Video of the resolution's [approval at 17:42](#) records Council President Jalali asking City Staff, "... what, in plain terms, are we doing?" Mr. Younghans answered, "You're approving the sale of the bonds."

The resolution itself appears to be incomplete as to what is being resolved. There is also a notation under its History Tab that the resolution was amended, yet Version 1 stands as the only approved version. The sponsor also changed.

Can the Zoning Committee further review with the City Clerk for any record of legislative action taken by the City Council that authorizes a contract with FCC?

State Statutes that require a three-fourths vote of City Council members are unusual and this provision speaks to what our State legislators think about who in the First-Class City of St. Paul should be making these refuse contract decisions and how many of them need to agree.

If all Council Members had been given the lawful opportunity to decide with whom to contract and where they should locate, then at least Mr. Lansberger and the Fort Road Federation would have had their opportunity to present their views in an open meeting, with their Ward Councilmember, before the City Council decided.

Please vote to deny any site approval for the FCC 560 site. There are many other site locations that have all the utilities necessary for FCC's and the City's success in hauling refuse to the Ramsey/Washington Recycling & Energy Center on Red Rock Road.

Respectfully,

John Purdy
10 W Delos St
St Paul, MN 55107
612-804-5019





1645

Red Rock Road

Red Rock Road

1400

Red Rock Road

Red Rock Road

Bailey Road

Bailey Road

Gerdau laydown yard

Submitted by
J. Purdy

natural gas pipeline



From: [sharon lynch](#)
To: [*CI-StPaul_ZoningCases](#)
Cc: [Julia McColley](#)
Subject: File # 25-015-397; FCC 560 Randolph
Date: Tuesday, April 22, 2025 5:13:16 PM

You don't often get email from sondouglas@hotmail.com. [Learn why this is important](#)

I am writing concerning the public hearing before the Zoning Committee (April 24, 3:30pm) to provide approval or denial of the site plan for the FCC facility at 560 Randolph Avenue. As a resident of the West End neighborhood, I am asking that you deny, not approve, the FCC site plan.

The City of Saint Paul has long worked on plans (Great River Plan, Mississippi River Corridor Plan) to bring people to the river through updated roads, green spaces, pedestrian and bike paths, and housing. The Great River plan specifically discusses housing for the Randolph Avenue space. In addition, the Fort Road Development Plan supports rezoning this site for public-friendly green space and updated streetscapes along Randolph.

While FCC's current plan is to house 32 trucks at 560, they have stated that they intend to contract with other areas and increase the number of trucks to 80. Randolph cannot support the constant use by 32 large trash trucks, let alone 80. The same holds true for West 7th Street.

Our neighborhood consists of housing and small businesses. It is an old neighborhood, so many streets are very narrow. Our neighborhood has become a vibrant community, a neighborhood where people want to live and recreate. Large trash trucks will add nothing to the West End neighborhood..

Above are a few of the reasons why I, and most of my neighbors, are hoping the FCC site plan for 560 Randolph Avenue will be denied.

Thank you,

Sharon Lynch
63 Douglas Street
Saint Paul, 55102
612-998-4224

From: [Dan Mollner](#)
To: [*CI-StPaul_ZoningCases](#)
Cc: julia@fortroadfederation.org
Subject: FCC Randolph/ File #: 25-015-397
Date: Wednesday, April 23, 2025 10:31:16 PM

You don't often get email from dmollner@gustavus.edu. [Learn why this is important](#)

I write to express strong opposition to the FCC Trash/fueling site on Randolph. This use is incompatible with longstanding city, neighborhood and river corridor plans which have sought to build a link between the W7th neighborhood and the river.

The comparison of the proposed use with a public works lot is flawed, particularly with the company's stated goals of regional expansion. The traffic impact on Randolph, W7th and Osceola will be more than significant. (30-80 trucks at least twice daily!) With the nearby main Fire Station, and the already dangerous confusion of the intersection of those three streets, this is a disaster in the making.

I support the city's new trash collection goals, and other than this misguided choice of an operations site, have been pleased with what I know of FCC. However, this is not a responsible decision. It is potentially harmful to the neighborhood, and ignores well established planning.

Daniel Mollner
382 Arbor Street
St. Paul

From: [delores barton](#)
To: [*CI-StPaul_ZoningCases](#)
Subject: FILE # 25-015-397 Trash Truck Site
Date: Thursday, April 24, 2025 9:43:47 AM

You don't often get email from dktbarton@gmail.com. [Learn why this is important](#)

Dear Zoning Commissioners:

I live on Erie, about 2 1/2 blocks from where the over 30 trash trucks park. Currently, they park near the back of their lot. People on James and Drake live about a block away, and those who live in the Schmidt complex (260 units) live as close as one and a half blocks from where the trucks currently park. Once they expand to 80 trucks, they will certainly be parking much closer to where people live.

I believe several factors make this station a bad fit for our neighborhood:

Safety

FCC will have compressed natural gas cylinders to store its fuel, and these can malfunction or rupture. These certainly can and sometimes do leak, not only contaminating the groundwater but also could cause fires or explosions. Sparks or excessive heat can also cause an explosion. Often people illegally put either hazardous or toxic things in containers that can break inside a garbage truck. For example, in December 2024, in Arlington Heights, Illinois, an explosion in a garbage truck injured three first responders after a lithium-ion battery was disposed of in someone's garbage. Some might suggest that a leak is unlikely, just as those who put the hated ethanol plant at the former Schmidt brewery site didn't think there would ever be an ammonia leak, yet there were at least two that were reported in the Pioneer Press.

Garbage trucks on average are cleaned about every three days, it says online. For 80 small garbage trucks, that would be about 20,000 to 24,000 gallons of water each time. This is a lot of runoff of water that might contain toxic liquid from improperly disposed of chemicals. I wonder if anyone has done a study to see if contaminated groundwater, which can spread widely, could reach the river or even the wells at Schmidt's where spring water is sold. Even empty garbage trucks probably attract rodents and insects, which multiply and eventually spread to nearby homes.

It is entirely possible that the land will become contaminated and when this company loses its contract, it may leave it for the city to clean up. Yes, they have for some strange reason a seven-year contract, but contracts can be terminated as FCC's contract with St. John's County, Florida, was terminated in August and the company has had issues in other localities as well, such as Polk and Clay counties in Florida. Just as we have had problems with other large haulers, we may very well have issues with FCC.

Traffic

Eighty garbage trucks coming and going five days a week (I did spot one coming back, probably from picking up missed trash on Saturday about 11 a.m.) is a lot of traffic for primarily a residential area. When we lost the ability to choose our own garbage haulers, we were told one reason was the wear and tear on the residential streets from having too many garbage trucks on the streets. Why is it now considered okay to have 80 garbage trucks going down residential streets in this neighborhood? Almost any afternoon that I am out, I see one going south on Oneida and heading down 7th Street and turning on Webster/Palace (it has two signs at that intersection) and heading to the FCC site or coming over the overpass and heading west on 7th until it gets to Webster/Palace and again to the FCC site. Many people live in those lofts on that street. I assume some trucks also go down Randolph, as I have seen one. But if most, or even half of the 80 trucks will be going down Webster/Palace, that would be 80 trips five days a week. No one would want to live there.

Other Issues

I know this area is zoned light industrial. I question why a fueling station would be light industrial with so many trucks, traffic, and storage of what could be dangerous to people who live nearby.

I also wonder why we didn't have any input as a community regarding this project. Even the city council was denied its voice when the mayor vetoed their vote without giving them a chance to override it. We have enough authoritarian government in Washington, and we don't need more of it in St. Paul.

Sincerely,
Delores Barton
380 Erie St.
St. Paul, MN 55102

From: [Julia Jackson](#)
To: [*CI-StPaul_ZoningCases](#)
Cc: julia@fortroadfederation.org
Subject: # 25-015-397 FCC trash site public comment
Date: Thursday, April 24, 2025 9:43:34 AM

You don't often get email from julia.e.jackson@gmail.com. [Learn why this is important](#)

To whom it may concern,

I will not be attending the public hearing this afternoon but wanted to send in my thoughts via email. I live about 1 block from the proposed FCC site on Duke Street with my husband and two young kids.

We love our neighborhood. We love being able to walk to the coop, even though the sidewalks are full of trash and traffic drives too fast on West 7th. We love walking to the library and playground even though West 7th is very dangerous to cross at Jefferson. And we love being able to access the paths along the river for walking and biking and exploring.

What a missed opportunity to let FCC use this site rather than incorporating it into a larger plan to help neighbors and city residents access the river corridor.

My understanding is that the city does have a larger vision, including the Great River Passage Plan, the Mississippi River Corridor Plan, and the Fort Road Development Plan, that the FCC site would undermine.

The river is such a huge asset to the city and to my neighborhood. It'd be amazing if we could keep working on building connections to the river, instead of having to walk past the ugliness, noise, and traffic of a trash truck fueling station.

Sincerely,

Julia
399 Duke Street

From: [Kathy Mollner](#)
To: [*CI-StPaul_ZoningCases](#)
Subject: 560 Randolph Avenue St.Paul File # 25-015-397
Date: Thursday, April 24, 2025 9:43:39 AM

You don't often get email from mollnerk@gmail.com. [Learn why this is important](#)

I am disappointed In Mayor Carter's support of the FCC trash and fueling station site on Randolph Ave. I feel he has dug in his heels and is not listening to the concerns of the neighborhood. We could have a win/win situation by finding a different location for FCC and developing the area in a way that is positive for the neighborhood and the Mississippi corridor.

I have lived my entire life in this neighborhood. I have a family member, living close by, who represents the sixth generation! The Randolph property could be developed in a way that would help our neighborhood thrive. I don't see a garbage hauling and washing station doing that. There would be an increase in heavy truck traffic at neighborhood intersections that are already dangerous. I have had my car totaled at the Osceola /Randolph/7th street corner and witnessed the death of a neighbor on Osceola and Jefferson. More truck traffic, no thank you.

Please, think this through and find a way to enhance the neighborhood and the beautiful Mississippi Riverway while relocating the FCC.

Katherine Mollner
375 So. Osceola Ave
St. Paul

From: [Marit Brock](#)
To: [*CI-StPaul_ZoningCases](#)
Cc: [Julia McColley](#)
Subject: Public Comment Opposing the Site Plan for 560 Randolph Avenue
Date: Wednesday, April 23, 2025 5:13:24 PM

You don't often get email from maritbrock@gmail.com. [Learn why this is important](#)

FILE # 25-015-397

Name: Marit Brock

Address: 74 Garfield Street

**Public Comment Opposing the Site Plan for 560 Randolph Avenue
FILE # 25-015-397**

April 23, 2025

To Zoning Committee Chair Simon Taghioff and members Kristine Grill, Nathaniel Hood, Mauricio Ochoa, Libby Starling and Omar Syed

Thank you for this opportunity to provide written testimony. I recognize that the situation you are facing is challenging. You have been put in a difficult position, where your professionalism and reputation are being called upon to endorse a plan that was so poorly executed by our city government.

As a long-time neighborhood activist, volunteer and former Fort Road Federation Board member and President, I have happily dedicated countless hours on projects intended to design the future of our community. While doing that work, city staff members and elected officials endorsed and assisted our work, and I believed them to be true partners in building this future. I am disappointed to see how easily city officials have disregarded this planning while trying to shoehorn their mistake into our neighborhood. The staff report repeatedly diminishes the value of our work and insists that the proposed FCC Trash Truck facility fits the comprehensive plan despite the available evidence.

The Fort Road Federation public comment does an excellent job describing all the reasons why you should not approve the Site Plan for 560 Randolph Avenue, and I will not repeat them here. The dedicated volunteers and hard-working staff of the Federation represent the interests of our community. I believe that you also have the best interests for the future of Saint Paul in mind as you dedicate your time and energy on this committee.

I am including the text of my recent letter to the Editor as an additional explanation of my concerns. My request to each of you is to listen to all of us who are dedicated to our community and the future of Saint Paul. Please do not approve the Site Plan for 560 Randolph.

Marit Brock

Letter to the Editor published in the Pioneer Press Sunday, April 20, 2025

The current “trash crisis” in Saint Paul is entirely self-inflicted, which makes the recent game playing between Mayor Carter, city departments and the City Council even more frustrating. (St. Paul Mayor Melvin Carter’s veto ups ante over trash with city council, Pioneer Press, April 15, 2025).

For those who have not been following the issue closely, the new trash contract requires the vendor to establish a facility within the city limits. While that requirement may be a good idea the implications of situating a new facility within city limits do not seem to have been thoroughly evaluated. For instance, the fundamental step of assessing the necessary zoning for such a facility was overlooked, resulting in the current lack of appropriate zoning regulations. The newly selected vendor, unfamiliar with Minnesota’s operational landscape, was left to navigate the complexities of identifying a suitable location without adequate guidance. In fact, at a community meeting last December a city staff person proudly proclaimed that the last available lot in the Pierce Butler Route industrial area had been purchased by the City of Saint Paul to expand its trash operations so could not be available for purchase by FCC. Big win for the Public Works department, big loss for the rest of us.

The City Council members should not be let off the hook here, either. A big transition such as a new city garbage facility should have gained the attention of every City Council member in order to make certain that this new facility did not disadvantage any Saint Paul neighborhood. It appears that none of our elected officials were paying attention to the best interests of their constituents.

Unfortunately, Mayor Carter’s veto of the City Council’s decision exemplifies a concerning trend where the priorities of development appear to be favored over the preferences of community members. Recent issues—such as the proposed amendments to the rent control ordinance (Saint Paul City Council gets an earful on rent control, tenant protections, Pioneer Press, April 9th, 2025) resistance to bike lane construction on Summit Avenue, and the FCC Truck facility—highlight how residents are expressing clear visions for their communities, which seem to be going unheeded.

As a former president of the Fort Road Federation, I found it disconcerting to witness how easily the dedicated efforts and meticulous planning of community members, alongside the labor invested by city staff over the course of decades, were disregarded by those responsible for the transition to the FCC contract. Moreover, the significant financial investment of tens of millions of taxpayer dollars in the Schmidt Brewery complex will not realize its full potential if the FCC garbage truck facility is developed at 560 Randolph as proposed.

This “crisis” can easily be averted by Mayor Carter choosing a different path, possibly even releasing FCC from their contractual obligation to have a site within the city limits. I am a strong advocate for the centralization of garbage services under a single vendor. However, if the execution of this plan requires degradation of quality of life, home values, and the long-term vision for any neighborhood, then it cannot be deemed a responsible course of action. Residents should not be forced to suffer the consequences of this poorly executed plan.

From: [Paula Tressler](#)
To: [*CI-StPaul_ZoningCases](#); julia@fortroadfederation.org
Subject: Subject: Zoning Case File: FILE # 25-015-397
Date: Thursday, April 24, 2025 9:43:28 AM

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Dear Zoning Committee,

As a resident of the West 7th/Fort Road area, I am writing to express my strong opposition to the proposed FCC Garbage Hauling Facility at 560 Randolph Avenue.

For many years, our community has been working toward a vision of reconnecting West 7th to Shepard Road, downtown Saint Paul, and the Mississippi River—creating an accessible and vibrant space for residents and visitors alike. This vision includes walkable neighborhoods, small businesses, and green spaces—not an industrial garbage hauling facility.

The addition of 30 to 80 garbage trucks daily would drastically increase traffic congestion, noise pollution, and pose a real safety risk to pedestrians and cyclists. This facility is not in alignment with the progress we've made, nor with the aspirations our community holds for the future.

West Seventh has seen significant investment from homeowners, renters, and business owners who are committed to revitalizing the area. A facility of this nature threatens to undermine those efforts. We believe this plan lacks sufficient community input and oversight, and does not reflect the best interests of our neighborhood.

Please reconsider this proposal and join us in protecting the integrity, safety, and livability of the West 7th area.

Sincerely,

Paula and Jeffrey Tressler

395 Colborne St.

St. Paul, MN 55102

From: [Sarah Bauer](#)
To: [*CI-StPaul_ZoningCases](#)
Cc: julia@fortroadfederation.org
Subject: Public Comment on file # 25-015-397
Date: Thursday, April 24, 2025 9:24:35 AM

You don't often get email from sarahbauer@gmail.com. [Learn why this is important](#)

Hello,

I am writing to include a public comment on file # 25-015-397. As a West Seventh homeowner, I strongly oppose having an industrial trash truck facility in our neighborhood.

I live and work in the neighborhood and have to drive past the proposed site every morning in order to get to work. Turning onto Randolph in order to cross Shepard Road is the only way to get to my office without driving through downtown, more than doubling my commute. That corner already has low visibility for drivers, as well as many cars and trucks parked along the side of the road. Adding in the traffic of trash trucks turning in and out would greatly compromise the safety of those using that stretch of road.

I also have a coworker who sometimes needs to take the bus to get to work, and the closest stop is at the corner of Randolph and W 7th. They then have to walk down Randolph past the proposed site. There are already inadequate sidewalks along this path, but adding in massive truck traffic would endanger pedestrians even more. I also try to walk or bike to work as much as possible and worry about my own safety with the added traffic to an already heavily used area.

I urge you to listen to the community in this matter and deny the site plan.

Thank you,
Sarah Bauer
222 Colborne St

Opposition to the City of St. Paul's Site Plan for 560 Randolph Avenue

FILE # 25-015-397

J.B. Shank

750 Otto Avenue, Apt. 2202

Saint Paul, 55102

I am writing to express my vehement opposition to the City of St. Paul's Site Plan for 560 Randolph Avenue (FILE # 25-015-397)

In order to approve the City of St. Paul's Site Plan for 560 Randolph Avenue, the planning commission must find that the site plan is consistent with:

1. The city's adopted comprehensive plan and development or project plans for sub-areas of the city.
2. Applicable ordinances of the city.
3. Preservation of unique geologic, geographic or historically significant characteristics of the city and environmentally sensitive areas.
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.
5. The arrangement of buildings, uses and facilities of the proposed development in order to ensure abutting property and/or its occupants will not be unreasonably affected.
6. Creation of energy-conserving design through landscaping and location, orientation and elevation of structures.
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.

along with four other criteria that are beyond my level of technical expertise to assess. Yet since the proposed plan fails on all seven of these tests, I do not see any justification for moving forward with this proposal. The [Public Comment on the Proposal](#) issued by the West Seventh/Ford Road Federation articulates all of my complaints clearly and decisively, so let me add to my support for that position by sharing a more personal perspective on this question.

I have lived in Saint Paul Ward 3 for over a quarter century, first up in the highlands in a 1924 bungalow where my wife and I raised two boys that both graduated from Saint Paul Central High School, and since 2022 in an empty-nest apartment down in the river flats. We moved down the hills and into the West 7th/Fort Road/Riverview Corridor neighborhood in order to have better access to the river and to join in the exciting renaissance currently occurring in this eclectic and vibrant community.

We have found the neighborhood to be exactly what we wanted it to be, but I have also come to realize the way that its vitality as a residential community has been achieved only through a constant fight with the city over many decades to change their perception of it as an industrial zone awaiting further commercial development.

I am a professional historian employed by the University of Minnesota, and my assessment of the history of this battle between residents of the West Seventh neighborhood and the city has been amply confirmed by my many conversations with long-time neighborhood resident and friend Joe Landsberger over the last decade. His recently published book *Origin Story*, which documents the struggle over the last century, is also a great record of this battle. What *Origin Story* teaches us is that while our neighborhood has always been a thriving home of a diverse community of people and families who consider the West Seventh/Fort Road corridor to be their residence and home, the city has repeatedly lost sight of that reality and instead viewed our neighborhood solely as a zone for industry and commercial development. All of the comprehensive site plans in place today articulate the need to balance residential living with industrial activity as the core dynamic of our neighborhood, yet the city continues to see only industrial development as the rationale for its planning.

The proposal to allow FCC Environmental Services to use the large, centrally located, and as-yet undeveloped property at 560 Randolph Avenue as a garbage truck parking and re-fueling depot illustrates perfectly the continuing failure of the city to see the real nature of our neighborhood and its ongoing efforts to force upon us an industrial reality that harms the residential core of our community.

Especially problematic in this case was the darkness that surrounded the early planning, a silence that led to the neighborhood only learning of the plan after the sale of the property for this purpose had already been completed and the transition to its use as a garbage truck depot was already underway. Our efforts to stop this development via the City Zoning Commission created further distrust of the city once their mishandling and manipulation of the variance process was revealed. We now turn to the City Planning Commission in the hope that it will halt the undemocratic processes that have been allowed to operate so far by doing the right thing through a rejection of this ill-conceived and deeply harmful use of our city land.

The West 7th/Fort Road/Riverview Corridor neighborhood has long been subjected to environmental injustices, from the destruction of homes for freeway construction to industrial developments that have polluted our air and water. What was once a vital core of the city of Saint Paul, and is still a neighborhood home to a vibrant and diverse community, has been continually treated by the city with neglect and disregard for its actual residential character. Forcing the neighborhood to accept a waste-hauling depot on one of the last pieces of developable, environment-friendly, river-connected property we have left would simply perpetuate this sad history of disregard. I ask, therefore, that you reject the proposed Site Plan for 560 Randolph Avenue (FILE # 25-015-397).

Respectfully submitted,

J.B. Shank

Area 3 Coordinator for the Fort Road Federation

Morse Alumni Distinguished University Teaching Professor in the Department of History, Scholar of the College of Liberal Arts, and Chair of the College of Liberal Arts Faculty Assembly at the University of Minnesota

From: [Kelsey Peterson](#)
To: [*CI-StPaul_ZoningCases](#)
Cc: [Julia McColley](#)
Subject: Written Testimony Against FCC Site
Date: Thursday, April 24, 2025 11:52:17 AM

You don't often get email from kelsey.jean.peterson@gmail.com. [Learn why this is important](#)

issue #:25-015-397

Hello Zoning Commission,

My name is Kelsey Peterson and I am a resident of the West 7th fort road neighborhood and live at Schmidt Artist lofts very near 560 Randolph.

The following is my written testimony that I will be giving later today at the meeting:

My name is Kelsey Peterson. I grew up in the West Seventh Street neighborhood and am proud to have lived in the renovated Schmidt Brewery since 2019.

I would like to respectfully remind the Commission that our opposition to the FCC site plan for 560 Randolph is consistent with a variety of several decades of community and city plans. These plans are not idle dreams, instead following them is how St. Paul has done business for over half a century.

Safety is important here. Speeding motorists are already treating Randolph and Jefferson as highways. There already is a dangerous lack of infrastructure like traffic lights, stop signs, and traffic regulation. In the few weeks FCC has been operating at 560 Randolph I've seen speeding and heavy acceleration by FCC trucks on Shepherd and trucks completely blocking visibility by both pedestrians and other drivers on Randolph. In fact, first day the FCC trucks were present at the site I witnessed them speeding. The situation will only worsen with 80 trucks operating on the site.

To say this is our community crying NIMBY is disrespecting thousands of hours of community and city planning. The environmental legacy of the Riverfront, pedestrians, vehicles and most important, basic livability of our neighborhood is threatened. City officials made a huge mistake here. Heavy industrial use does not belong in neighborhood nodes like this. Please, it is up to you Commissioners to stop what has the potential to be an extremely disastrous situation.

Thank you,
Kelsey Peterson

Sent from my iPhone

Dear Zoning Committee,

My name is Maggie Rock, and I am a resident of the West 7th neighborhood. I'm writing to voice my strong opposition to the proposed site plan for 560 Randolph Avenue, currently under consideration in FILE #25-015-397.

As a community member, I've seen firsthand the care and effort that's gone into planning the future of this corridor. The West 7th / Fort Road area has long been envisioned as a walkable, river-connected, and environmentally conscious neighborhood—something that the 2040 Comprehensive Plan and multiple adopted plans like the Great River Passage and Fort Road Development Plan strongly support.

This proposal—to place a high-intensity trash truck facility on this critical site—is not just incompatible with those plans; it actively undermines them. Our neighborhood has fought hard for reinvestment that reflects our values: clean air, safe streets, public access to the river, and a vibrant mix of housing and local businesses. A garbage truck yard brings none of these things.

Instead, we're being asked to bear the environmental and traffic burdens of an industrial use that will only make it harder to realize the mixed-use, residential future that our city has promised us through years of planning and public engagement.

I'm especially concerned about the environmental risks. This site sits near Fountain Cave and within the Mississippi River Critical Area. The plan lacks sufficient detail on stormwater and sewage management. How can we move forward with a project that may be funneling truck runoff—filled with oil, debris, and chemicals—into one of our region's most sensitive ecosystems?

And then there's the traffic. Randolph Avenue already lacks basic pedestrian infrastructure. Now imagine dozens of trucks entering and exiting daily, right where children bike and families walk to access the river. This isn't just bad planning—it's dangerous.

This plan may solve a problem for the city's waste needs, but it does so at our neighborhood's expense. It's inequitable. It's short-sighted. And it's completely out of step with what Saint Paul has promised this community.

I respectfully urge you to reject this site plan and stand with the vision that our city and community have spent years building together. Let's not sacrifice the long-term future of West 7th for a short-term industrial fix. Thank you.

Sincerely,

Maggie Rock

Resident and First Vice President of the West 7th/Fort Road Federation

From: [John Yust](#)
To: [*CI-StPaul_ZoningCases](#)
Cc: [McColley Julia](#); [Duhr Meg](#)
Subject: 560 Randolph
Date: Thursday, April 24, 2025 1:32:58 PM

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To members of the Zoning Committee reviewing 560 Randolph:

The site plan for FCC Environmental Services should not be on your agenda. The site plan is irrelevant because FCC Environmental does not belong at 560 Randolph. Neither Mayor Carter nor his staff have made an ounce of good faith effort in finding an appropriate location for FCC. This whole process is a sham.

John Yust, 256 Goodrich Avenue

From: [Sara Fleetham](#)
To: [*CI-StPaul_ZoningCases](#)
Cc: [Julia McColley](#); fleets@mindspring.com
Subject: File # 25-015-397
Date: Thursday, April 24, 2025 1:45:09 PM

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File# 25-015-397

I ask the Zoning Committee to deny FCC's Site Plan for the Industrial Trash Truck Facility, 560 Randolph Avenue.

This site is crucial for the future of housing, transit and river development in my neighborhood. Randolph Avenue is one of only 3 access points in my neighborhood to the river. This project creates additional barriers to the river and makes this access point less safe.

There will be a drastic increase on scale and impact with additional noise and congestion. Most importantly the excessive wear and tear on a decades long neglected roadway is not suitable for the neighborhood.

I was a part of the Citizens Advisory Committee for the Great River Passage plan for the Mississippi River Learning Center and this project does not fit within the Great River Passage Plan, the Mississippi Corridor Plan, FRF Development plan and many aspects of the Comprehensive City Plan. This project is in **direct opposition** to these plans.

We need to keep working the plans. As a city we have been doing better with access to affordable housing and creating more housing as referenced in a Minnpost article from 2/13/2025:

<https://www.minnpost.com/community-voices/2025/02/st-paul-can-hang-its-hat-on-some-recent-development-successes/>.

It is vitally Important for the river, access to the river, and my neighborhood's livability that FCC not use this land parcel as a truck storage and refueling station.

Sara Fleetham

953 Scheffer Ave

Saint Paul, MN 55102

Simon Taghioff

St Paul Zoning Committee Ch

25 West 4th Street

City Hall Annex, Suite 1400

St. Paul Minn 55102

April 7, 2025

Dear sir,

I am writing to you about the FCC trash hauling problem in the city. I live close to the area where FCC wants to store their trucks. I've been to three public meetings where I have spoken to protest the contract that somehow was approved without some vital required review.

I am citing information I have read in three neighborhood newspapers; the MINNPOST, My Villager and twincites.com.

I site two big mistakes from My Villager, Mar 25, 2025. The plot was purchased last fall in 2024. The Zoning Committee **did not schedule** a public hearing until March 27 of this year, 6 days BEFORE the trucks were supposed to start picking up the trash. Akso, there were 19 of 27 pieces of public testimony that were not provided to the Planning Commission Zoning Committee.

I ask these questions: **Why was the Zoning meeting scheduled so late in the process and what happened to the 19 pieces of public testimony?????**

From twincites.com Mar 20, 2025,, the city council Pres Noecker talks about two items that seem to be the responsibility of FCC, and were not done in a timely manner. They are: #1) a site plan was not approved and #2) state permits are required.

Chairman Taghioff, I worked for 33 years in an industry that was required to follow State and Federal rules, regulations, and other legalities. I worked as a reactor operator, and control room supervisor at the Monticello Nuclear Plant when the Three Mile Island 1979 and Chernobyl, 1986, nuclear reactors "destroyed" themselves. Both of these accidents were the result of "human error". After the TMI accident, all nuc plants in the USA were required, by the Nuclear Regulatory Commission, to review all of their safety procedures and amend them to follow safer paths. Many of our procedures we were changed to require us to use "two sets of eyes, and hands" to verify that an action was performed correctly. These procedures were all changed to provide for a second signature or initials.

Mr. Taghioff, there are rules regulations and procedures in ALL business's and governments. You need to make sure that your department follow yours.

I'm requesting that you do your duty to follow the cities procedures in this matter.

Respectfully



Robert Rohland

Cc: Mayor Melvin Carter,

St Paul City Council President Rebecca Noecker

From: [Jeanne M](#)
To: [*CI-StPaul_ZoningCases](#)
Subject: Public comment
Date: Thursday, April 24, 2025 2:01:13 PM

You don't often get email from morganjj64@gmail.com. [Learn why this is important](#)

FILE # 25-015-397

Name: Jeanne Morgan

Address: 895 James Ave. St. Paul MN 55102

Dear Zoning Committee members,

I strongly object to having the FCC trash truck facility at 560 Randolph Ave.

It conflicts with the vision and plans for a river oriented mixed use and residential area that the neighborhood wants for the future. So much heavy industrial traffic would impede pedestrian friendly access to the river. It would create a burden on the whole neighborhood with so many more trucks coming and going from all over the city.

Please vote to locate it elsewhere in our great city.

Thank you

Jeanne Morgan

Saint Paul City Council Members,

April 24, 2025

I am writing to express my significant concern about Mayor Carter's veto decision, after the decision of the City Council that ultimately resulted in him declaring a "State of Emergency" after very reasonable concerns and objections were raised by the West 7th Fort Road Federation and surrounding community regarding the FCC Environmental facility at 560 Randolph Ave.

I implore Mayor Carter and the city to work to seek a mutually beneficial path forward with neighborhood residents for a long-term home at a different location, to create the space to carry forward the visions that Mayor Carter, City Council members and community members and leaders have embraced related to affordable housing in the City Comprehensive Plan and Great River Passage Plan, among others.

The neighbors in our area near the 560 Randolph site will be and already are impacted by the day-to-day traffic and disruption due to FCC Environmental' activities. As a resident on Osceola Avenue, the concerns aren't just about disruption but are about real safety issues for those of us with young kids in the neighborhood and future young families to follow: The increased pollution from garbage trucks up and down our street and increased traffic in an area where there are many known documented pedestrian-vehicle collisions will only be exacerbated. Other communities around the country and globe have documented the negative health impacts related to sites like these. We also want our community to be one that continues to thrive, but the FCC operation will only stunting the long-term development potential in the neighborhood if the FCC site is permanently sited at 560 Randolph.

The approach by the City to-date hasn't been the thoughtful, grounded and collaborative leadership we have come to expect from Mayor Carter and his administration, but it is not too late to work collaboratively with the neighborhood to change course, and to expand the conversation outside the neighborhood thoughtfully.

The decisions made by the Mayor's office so far demonstrate a lack of vision for the future potential and reinvigoration of the West End, but we look forward to the opportunity presented in this 90-day window under the emergency order to go back to square one and involve the West 7th neighborhood in a respectful way that account for all the formal plans and informal visions we all have for this part of Saint Paul.

Thank you for your consideration,

Stephanie Pinkalla

367 Osceola Ave.

From: [Morgan Sanchez](#)
To: [*CI-StPaul_ZoningCases](#)
Cc: julia@fortroadfederation.org
Subject: FILE # 25-015-397 - Public Testimony
Date: Friday, April 25, 2025 4:25:57 PM

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FILE # 25-015-397

Morgan Sanchez
380 Randolph Ave.
Apt. 378
St. Paul, MN 55102

**Public Testimony of Morgan Sanchez
In Opposition to the Site Plan for 560 Randolph Avenue
City Zoning Committee Meeting**

Good evening, members of the committee. My name is Morgan Sanchez, and I am a resident of the Waterford Bay Apartments at 380 Randolph Avenue. Our apartment complex—home to over 250 residents—is located directly across Shepard Road from the proposed site at 560 Randolph Avenue, where FCC Environmental is seeking to construct a trash truck center.

Since moving to the West 7th neighborhood, I've truly come to love this community. It's a vibrant, welcoming place with a growing sense of connection to the river, nature, and the city itself. I would like nothing more than to continue living here for years to come—granted it remains a safe, livable, and inviting place to call home. That future is at risk if we begin allowing incompatible industrial developments like this one to take root in the very spaces meant for people, not pollution.

The proposed trash truck facility is fundamentally out of step with the city's 2040 Comprehensive Plan and its guiding principles. This plan, along with supporting documents, prioritizes equitable river access, mixed-use development, sustainable land use, and environmental health—none of which are supported by this proposed project. In fact, the plan appears to disregard these goals entirely. It threatens to introduce long-term harm to the area by degrading the environmental integrity of the Mississippi River Critical Overlay District and creating public health concerns through unresolved issues like inadequate sewage disposal and stormwater management. Approving this site plan would not only contradict adopted city policy but would set a troubling precedent for how we prioritize—or neglect—the wellbeing of our communities and our natural resources.

Rather than a high-intensity waste facility, I would love to see this site thoughtfully redeveloped for mixed-use that aligns with the city's vision—something that brings life, connection, and access to the river. As it stands, there's not even a sidewalk across the street for residents like myself to safely walk past this property toward West 7th Street and its local businesses. This lack of basic pedestrian infrastructure cuts us off from our neighborhood and reinforces just how poorly suited this location is for further industrial use. We need a plan that brings the community together, not one that isolates and endangers it.

We ask you not only to consider what's legal and procedural, but what's right for this community. Please listen to the residents who live here and reject the site plan for 560

Randolph Avenue.

Thank you for your time and for your thoughtful consideration.

From: [Paula Tressler](#)
To: [*CI-StPaul_ZoningCases](#); julia@fortroadfederation.org
Subject: Zoning Case File: #25-015-397
Date: Friday, April 25, 2025 4:25:20 PM

Re: Property at 560 Randolph Ave. St. Paul, MN 55102

Dear Zoning Committee,

As a resident of the West 7th/Fort Road area, I am writing to express my strong opposition to the proposed FCC Garbage Hauling Facility at 560 Randolph Avenue.

For many years, our community has been working toward a vision of reconnecting West 7th to Shepard Road, downtown Saint Paul, and the Mississippi River—creating an accessible and vibrant space for residents and visitors alike. This vision includes walkable neighborhoods, small businesses, and green spaces—not an industrial garbage hauling facility.

The addition of 30 to 80 garbage trucks daily would drastically increase traffic congestion, noise pollution, and pose a real safety risk to pedestrians and cyclists. This facility is not in alignment with the progress we've made, nor with the aspirations our community holds for the future.

West Seventh has seen significant investment from homeowners, renters, and business owners who are committed to revitalizing the area. A facility of this nature threatens to undermine those efforts. We believe this plan lacks sufficient community input and oversight, and does not reflect the best interests of our neighborhood.

Please reconsider this proposal and join us in protecting the integrity, safety, and livability of the West 7th area.

Sincerely,

Paula and Jeffrey Tressler

395 Colborne St.

St. Paul, MN 55102



From: [Marijka B.G. Muras](#)
To: [*CI-StPaul_ZoningCases](#)
Cc: julia@fortroadfederation.org
Subject: public comment, FILE # 25-015-397, 560 Randolph Ave
Date: Friday, April 25, 2025 4:25:11 PM

You don't often get email from marijka_bg@yahoo.com. [Learn why this is important](#)

For City Council Meeting 4/24/2025 re FILE # 25-015-397, 560 Randolph Ave
Marijka Muras, 765 Armstrong Ave, St Paul MN 55102

My name is Marijka Muras, I'm a St Paul resident and I live 2 blocks from the W7th and Randolph intersection. I'm a parent of 2 children, ages 6 & 8, and I've lived here since 2014.

I grew up on a boathouse on the Mississippi River in Winona, MN and have always felt a kinship with these waters and a responsibility for its care and protection. One of the things I love most about our neighborhood is its proximity to the river, I bring my children to its banks, whether in the green space of Crosby Farm, or the paths along the downtown riverfront. When we were in our stroller days, walking down Randolph to access the walking and biking paths of Old Shepherd Road and the riverfront was an anxiety-inducing experience, with its lack of sidewalks or any safety for pedestrians. Now in our biking days, I would even call it harrowing.

Bringing thousands of garbage and recycling trucks blocks from our houses and businesses to refuel, with all the noise, pollution, and traffic that brings fills me with dread. I believe that the site plan very clearly does not meet many of the criteria that are required for approval, in particular, the preservation of unique and historical characteristics of the city, safety and convenience of vehicular and pedestrian traffic and protection of neighboring properties, like mine.

We are very literally in the midst of climate catastrophe. The investment of land and money into continued reliance on fossil fuels in the form of an industrial fueling station is grievously shortsighted, unfair, and counter to the vision a vital, green and vibrant city. The transfer station also would interfere with the proposed Regional Multi Use Trail and would add to the response times from our nearby fire station. The West Seventh neighborhood has borne the burden of more than our fair share of industrial development and we should be fully and meaningfully heard on this matter that will impact our city for decades.

Thank you.