



February 11, 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: Response to Appeal of Statement of Clarification issued in connection with Determination of Similar Use for proposed facility at 560 Randolph Avenue (City File #25-005-778)

Dear Members of the Zoning Committee and Planning Commission:

This letter is submitted on behalf of FCC Environmental Services, LLC (“**FCC**”) in response to the appeal (the “**Appeal**”) filed in connection with the Statement of Clarification issued by the Zoning Administrator (“**Staff**”) of the City of Saint Paul (the “**City**”) for FCC’s proposed waste collection dispatch facility (the “**Facility**”) at 560 Randolph Avenue (the “**Property**”). The Appeal was filed on January 16, 2025 by the West 7th/Fort Road Federation (“**Appellant**”) pursuant to Saint Paul Legislative Code (the “**Code**”) Section 61.701.

The review process followed by Staff in issuing the Statement of Clarification satisfies the standards for a similar use determination set forth in City Code Section 61.106. As discussed below, the issues raised in the Appeal do not present any error on the part of Staff in determining that FCC’s proposed use of the Facility is similar to a public works yard or maintenance facility as outlined in Code Section 66.521. FCC appreciates the opportunity to share additional information and answer any questions the City may have about the proposed Facility. For the reasons stated herein, FCC respectfully requests that the Planning Commission adopt the recommendation of Staff, deny the Appeal, and affirm Staff’s decision to issue the Statement of Clarification in favor of FCC’s Proposed Use (as hereinafter defined).

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.

As described in its Request (as hereinafter defined), FCC intends to use the Facility as its main operational dispatch and maintenance center for providing waste collection services (the “**Proposed Use**”), 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. Despite minor repurposing, FCC proposes to use the Facility very similarly to the multiple trucking purposes that previously occupied the site, resulting in little anticipated disruption to the surrounding properties and/or traffic.

II. Procedural Background

FCC has submitted a proposed site plan to the City to accommodate necessary zoning approvals required for operation of the Facility. In order to proceed with the site plan, FCC must provide evidence that its Proposed Use is permitted on the Property under the City’s zoning ordinances. Because the Proposed Use is not listed in the Code, FCC submitted a Request for Statement of Clarification on December 16, 2024 (the “**Request**”), asking Staff to determine and issue its finding as to whether the Proposed Use is substantially similar to a public works yard or maintenance facility.¹ Staff issued the Statement of Clarification on January 10, 2025, finding that FCC’s Proposed Use is “similar in character and impact to a public works yard or maintenance facility, a permitted principal use within the I1 Light Industrial zoning district.” This Appeal followed.

III. Staff appropriately determined that the Proposed Use is substantially similar to a permitted use in the I1 Zoning District.

Section 61.106 of the Code sets forth the standards that must be considered by Staff in evaluating a request for a statement of clarification. Specifically, the Code states that Staff “shall make the following findings in determining one use is similar to another:

- (a) That the use is similar in character to one (1) or more of the principal uses permitted.
- (b) That the traffic generated by such use is similar to one (1) or more of the principal uses permitted.
- (c) That the use is not first permitted in a less restrictive zoning district.

¹ See Code § 66.521.

- (d) That the use is consistent with the comprehensive plan.”²

As the Zoning Committee Staff Report dated January 23, 2025 (“**Staff Report**”) confirms, Staff correctly concluded that all four (4) of these standards were satisfied in issuing the Statement of Clarification. While the Appeal attempts to identify various areas of concern with the Proposed Use, the Planning Commission must review the four (4) standards and determine whether Staff erred in determining that the Proposed Use satisfies these criteria. As outlined below, the Proposed Use of the Facility does meet all of the criteria set forth in the Code and, therefore, the Statement of Clarification should be affirmed.

A. The Proposed Use is similar in character to a principal use permitted in the I1 Zoning District.

The Code requires that the Planning Commission consider whether the proposed use is similar in character to one (1) or more of the principal uses permitted in the zoning district in which the subject property lies.³ As previously noted, the Property lies within the I1 Light Industrial Zoning District. This district is intended to accommodate industrial operations whose external physical effects are restricted to the area of the district and in no manner affect surrounding districts in a detrimental way.⁴ Over ninety (90) land uses are permitted within this district, along with an additional number of conditional uses.⁵ While the Proposed Use is not listed in the Code, it is substantially similar in character to a public works yard or maintenance facility, which is permitted within the I1 Zoning District. A “public works yard or maintenance facility” is also undefined in the Code, so Staff appropriately relied upon comparison to similar facilities within the City to determine its character. In the Statement of Clarification, Staff accurately described a comparable public works yard located at 891 Dale Street, which is sometimes referred to as the City’s “Fleet Services,” a division of the Department of Public Works. This facility operates with similar components to FCC’s Proposed Use, including employee offices and parking, fleet parking, fueling stations, and a maintenance garage.⁶ As such, the Proposed Use aligns closely with the functions the City has historically permitted within its public works yards and/or maintenance facilities.

Appellant’s claim that the Proposed Use of the Facility “fundamentally diverge[s] in character and purpose” from a public works yard or maintenance facility is erroneous. Appellant first argues that, because FCC is a private company, it does not share a public works yard’s priority to provide municipal services. To the contrary, FCC has acquired and is repurposing the Property in order to service the Contract awarded by the City, which will service over sixty-six thousand (66,000) residential units. Although the City has chosen a private company to provide its waste collection services, it does not undermine FCC’s dedication to providing this vital municipal service.

² Code § 61.106.

³ Code § 61.106(a).

⁴ Code § 66.512.

⁵ See Code § 66.521.

⁶ See Statement of Clarification, ¶3.

Appellant's further claim that the nature of FCC as a private company will generate environmental and operational impacts unlike a public works yard is factually inaccurate. The Facility and FCC's operations will be subject to the same environmental requirements as any facility undertaking similar vehicle dispatch, fleet maintenance, fueling and administrative functions, whether publicly or privately owned and/or operated. Any such requirements will be reviewed and determined during the site plan approval process.

The Appeal also claims that the Facility's daily operation is "incompatible" with its surroundings and will result in significant external impacts that conflict with the intent of the I1 Zoning District. As noted above, the I1 Zoning District is intended to accommodate industrial operations whose external physical effects are restricted to the area of the district and in no manner affect surrounding districts *in a detrimental way*.⁷ The nature of a use as potentially "high-traffic" is not itself inconsistent with this intent, as the Code clearly permits a number of high-traffic uses within the district that could cause noise and traffic congestion.⁸ Any argument that fleet-based operations are inconsistent with the district is completely illogical given the permitted uses set forth in the Code, such as a bus garage or taxi dispatch.⁹ It is also not inconsistent with the Code for a permitted industrial use to be in proximity to traditional neighborhood districts. As the Staff Report acknowledges, the Code explicitly recognizes that transitional areas between industrial and residential zones may exist.¹⁰ In fact, Code Section 66.543 contemplates additional development design standards in the I1 Zoning District for portions of land within one hundred fifty (150) feet of a parcel in a residential or traditional neighborhood district. Therefore, the Zoning Code contemplates that some high-traffic uses within the I1 Zoning District may be near traditional neighborhood districts. This fact is not "fundamentally inconsistent with the character or purpose of the district."

The Code clearly considers a public works yard or maintenance facility to be consistent with the intent of the I1 Zoning District as a permitted use. As noted in the Statement of Clarification and Staff Report, public works yards and maintenance facilities in the City have historically included fleet parking and dispatch, fueling stations, and maintenance garages, all of which the Facility proposes to include. Further, the Property is surrounded by designated commercial truck routes,¹¹ designed to accommodate 9- and 10-ton trucks consistent with the City's policy to implement and support transportation improvements in and near industrial areas of regional economic importance.¹² FCC's Proposed Use will not impose any further noise or traffic congestion than is already contemplated on the commercial truck routes surrounding the Property.

⁷ Code § 66.512 (emphasis added).

⁸ See Code § 66.521 (for example, drive-through sales and services; auto convenience market; auto service station; car wash; parking facility; bus garage, station, lot or turnaround; taxi dispatching, maintenance and storage; recycling collection center; recycling drop-off station).

⁹ See Code § 66.521.

¹⁰ Staff Report, Finding 2(a).

¹¹ See 2040 Comprehensive Plan, Map T-15.

¹² See 2040 Comprehensive Plan, Policy T-14.

Finally, Appellant’s argument that the Proposed Use is inconsistent with the “community-oriented vision” for the Property set forth in other city plans is irrelevant to the Planning Commission’s determination of whether the Proposed Use is similar to a permitted use within the I1 Zoning District. For the various reasons described above and in the Statement of Clarification and Staff Report, the Proposed Use is substantially similar in character to a public works yard or maintenance facility, which is permitted in the district in which the Property is located. Reference to future goals for surrounding properties is not required to make this determination.

Notwithstanding, to the extent the Planning Commission considers these claims, “other city plans”—plans adopted through the City Council to address specific topics or geographies¹³—do not supersede the City’s Saint Paul for All: 2040 Comprehensive Plan (the “**Comprehensive Plan**”).¹⁴ As will be discussed in further detail, the Comprehensive Plan clearly contemplates that the Property is currently and will continued to be used for industrial purposes.¹⁵ Therefore, the Proposed Use is not inconsistent with the vision for the Property.

B. The traffic generated by the Proposed Use is similar to a principal use permitted in the I1 Zoning District.

The Code also requires that the Planning Commission consider whether the proposed use will generate traffic similar to one (1) or more of the principal uses permitted in the zoning district in which the subject property is located.¹⁶ As previously mentioned above, the I1 Zoning District permits a number of potentially “high-traffic” uses, such as drive-through sales and services, automobile convenience markets, car washes, parking facilities, bus garages, stations, lots and/or turnarounds, and taxi dispatching, maintenance and storage, to name a few.¹⁷ As described in the Statement of Clarification and Staff Report, the Proposed Use is expected to generate traffic patterns similar to public works yards located elsewhere within the City. Therefore, the Facility’s anticipated traffic impact is similar to a principal permitted use within the I1 Zoning District.

The Statement of Clarification and Staff Report note that the Property was previously used for trucking-related businesses such that the anticipated traffic impact of the Facility is consistent with historical usage of the site.¹⁸ The Appeal claims that the Property’s prior function as a tow-yard involved only four (4) to (6) trucks “operating intermittently.” FCC does not dispute that the Property has been the main operation of a towing service in recent years. However, City Council records indicate that the Property was also used for operation of solid waste hauler vehicles as

¹³ 2040 Comprehensive Plan at 17.

¹⁴ See 2040 Comprehensive Plan at 17; *State ex rel. Neighbors for E. Bank Livability v. City of Minneapolis*, 915 N.W.2d 505, 511 (Minn. Ct. App. 2018).

¹⁵ See 2040 Comprehensive Plan, Maps LU-1, LU-2.

¹⁶ Code § 61.106(b).

¹⁷ See Code § 66.521

¹⁸ See Statement of Clarification, ¶5(b).

recently as 2017.¹⁹ These types of vehicles are engaged in the “hauling of putrescible and non-putrescible solid waste,” including garbage and rubbish.²⁰ This use appears comparable to the waste collection services that FCC will provide pursuant to the Contract. Therefore, Staff’s indication that the Proposed Use is consistent with historical trucking-related usage of the Property was appropriate.

Appellant alleges that the traffic generated by the Proposed Use will be inconsistent with the character of the surrounding area. However, this argument is irrelevant to the Planning Commission’s determination of whether traffic generated by the Proposed Use is similar to a permitted use within the I1 Zoning District. As identified by Staff and described above, the anticipated traffic impact of the Proposed Use is substantially similar to a public works yard or maintenance facility, which is permitted in the district in which the Property is located. Notwithstanding our objection to the consideration of these concerns, any claims that the Facility’s proposed traffic patterns are incompatible with the area’s mixed-use character are misplaced for several reasons. As the Staff Report notes, claims of adverse impacts on the neighborhood remain speculative and are not supported by concrete evidence of safety violations or disruptions to the surrounding areas.²¹

Further, the Property has historically been located within a mixed-use area contemplating industrial, commercial and residential uses, as well as near the Randolph/West Seventh “Neighborhood Center” or “Neighborhood Node.”²² “Neighborhood Nodes” are described as compact, mixed-use areas that provide a variety of neighborhood-scale services, civic and institutional uses, recreational facilities and employment.²³ However, the location of a Neighborhood Node does not itself prohibit industrial uses from being appropriately operated near such a mixed-use area. It would be inconsistent with the intent of the Comprehensive Plan for the Property, which is guided for continued industrial use,²⁴ to be prohibited from operating a permitted use within its zoning district purely because of its proximity to a Neighborhood Node. If all industrial properties located near Neighborhood Nodes are prevented from operating a permitted use, much of the City’s forecasted land use becomes completely illogical. Map LU-2 of the Comprehensive Plan demonstrates that many Neighborhood Nodes are located near or even within industrial-guided districts. Further, the Map indicates that the size of the circle on the map “does not indicate [the] extent of [the] Node,” leaving ambiguity as to the Comprehensive Plan’s intended scope for the Randolph-West Seventh Node.

¹⁹ See City of Saint Paul City Council Minutes at 2 (Nov. 8, 2017).

²⁰ See City of Saint Paul, *Solid Waste Hauler & Vehicle*, <https://www.stpaul.gov/departments/safety-inspections/open-operate-expand-business/business-licenses-and-permits/solid-waste-hauler> (last edited June 10, 2024).

²¹ Staff Report, Finding 2(b).

²² See 2030 Comprehensive Plan, Figures LU-A, LU-B, LU-K; 2040 Comprehensive Plan, Maps LU-1, LU-2.

²³ See 2040 Comprehensive Plan at 48.

²⁴ 2040 Comprehensive Plan, Map LU-2.

Related to the nearby Neighborhood Node, Appellant raises concerns that the Proposed Use is inconsistent with the other city plans related to pedestrians and bicyclists. As previously discussed, other city plans do not supersede the Comprehensive Plan, which guides the Property for continued industrial use. Regardless, the Saint Paul Pedestrian Plan adopted in 2019 (the “**Pedestrian Plan**”) does not identify the Property within a high priority area for walking investments. Rather, the Property and surrounding area is depicted as “medium priority.”²⁵ The Pedestrian Plan acknowledges that the “High Priority Areas” will guide the location of capital investments and identify where walking investments are likely to have the greatest impact on advancing equity and safety goals.²⁶ Further, proposed walking investments include sidewalk infill, sidewalk repair and crossing improvements.²⁷ FCC’s Proposed Use of the Property will in no way impede the City’s ability to make such investments and improvements within the area as desired.

Appellant also flags that City of Saint Paul Bicycle Plan adopted in April 2024 (the “**Bicycle Plan**”) proposes additional bicycle networking around the Property.²⁸ FCC does not dispute that both major and minor bikeways are planned near the Property,²⁹ and welcomes the City’s efforts to invest in additional bicycle safety infrastructure consistent with the Bicycle Plan. However, what the Appeal fails to acknowledge is that the bicycle network currently existing and planned near the Property consists of separated bikeways and paths.³⁰ Separated bikeways and paths provide a space specific for bicycle travel (not traditional sidewalks) that is vertically and horizontally separated from motor vehicle traffic, greatly enhancing safety for bicyclists.³¹ The Bicycle Plan appropriately identifies these separated bikeways and paths as part of the City’s “planned low stress bicycle network,” even with their proximity to multiple commercial truck routes.³² Given the recent adoption of the Bicycle Plan, the City has contemplated the location of this low stress network near the industrial nature of the Property. Additionally, the Comprehensive Plan contemplates proposed bicycle transportation networking and transitways near the Property in the future.³³ FCC’s Facility will not endanger any of these efforts. For these reasons, the Proposed Use is not inconsistent with the “multimodal transportation,” “accessibility,” or “neighborhood connectivity” goals for the surrounding area.

C. The Proposed Use is not first permitted in a less restrictive zoning district.

The third finding the Planning Commission must consider to determine a similar use is that the proposed use is not first permitted in a less restrictive zoning district.³⁴ As Staff identified in the

²⁵ Pedestrian Plan at 27.

²⁶ Pedestrian Plan at 27.

²⁷ Pedestrian Plan at 27.

²⁸ Bicycle Plan, Figure 1.

²⁹ Bicycle Plan, Figure 4.

³⁰ Bicycle Plan, Figures 6, 7.

³¹ Bicycle Plan at 42.

³² Bicycle Plan at 60, Figure 11.

³³ 2040 Comprehensive Plan, Maps T-4, T8.

³⁴ Code § 61.106(c).

Statement of Clarification, the Proposed Use is not described in the Zoning Code. However, it is most similar to a public works yard or maintenance facility, which is not first permitted in a less restrictive zoning district. Section 66.521 demonstrates that a public works yard or maintenance facility is only permitted in the I1 and more restrictive I2 General Industrial and I3 Heavy Industrial Zoning Districts. Therefore, Staff did not err in making this finding.

Appellant's argument that Staff erred in making its finding because the Property is located near a Neighborhood Node is misplaced. The land use restrictions set forth in the zoning ordinances and permitted uses within certain zoning districts are unrelated to the location of the Neighborhood Node. Appellant again argues that other city plans should supersede FCC's right to use the Property for a permitted industrial use under both the Code and the Comprehensive Plan. As previously noted, other city plans do not prevail over the Comprehensive Plan, which guides the Property as industrial. Therefore, claims related to any district or small area plans are unrelated to this standard of Code Section 61.106 and should be rejected.

Additionally, the Staff Report correctly indicates that Appellant's request to reconsider zoning of the Property or conduct a rezoning study is outside the scope of the determination at issue.³⁵ Code Section 61.106 requires Staff, the Zoning Committee and the Planning Commission to make a determination of similar use based on the current zoning requirements set forth in the Code. The City has not received, nor initiated, any formal application or process to rezone the Property. Therefore, any request for a study of the Property should also be rejected.

D. The Proposed Use is consistent with the City's 2040 Comprehensive Plan.

Finally, the Code requires that Planning Commission determine whether the proposed use is consistent with the Comprehensive Plan.³⁶ The Comprehensive Plan provides a "blueprint" for future development both citywide and in particular areas. Based on the applicable guidance for the Property, Staff correctly determined that the Proposed Use is consistent with the Comprehensive Plan's policies and goals for the site. Through the site plan approval process, FCC will ensure proper zoning and infrastructure support for the Facility, offering environmentally and economically efficient, resilient development of the Property.³⁷ The Proposed Use will support and encourage development that maximizes the City's tax base, job creation and/or job retention, and protect current industrial land from conversions to residential or institutional uses unless guided otherwise.³⁸ The Proposed Use aligns with each of these goals.

It is important to note that, in addition to guiding property for a particular use, the Comprehensive Plan identifies more than two hundred (200) draft policies, each of which supports the City's goals and values. These policies are high-level statements intended to guide City decision-making in a

³⁵ Staff Report, Finding 2(c).

³⁶ Code § 61.106(d).

³⁷ 2040 Comprehensive Plan at 39, Policy LU-8.

³⁸ 2040 Comprehensive Plan at 44, Policies LU-45, LU-46.

manner that achieves the goals of the Comprehensive Plan. By citing specific Comprehensive Plan policies, specifically those which relate to neighborhood nodes and opportunity sites located near (but are not within) the Property, the Appeal mischaracterizes the consistency of the Proposed Use with the Comprehensive Plan as a whole. For example, Appellant's argument that the Facility actively contradicts objectives of Parks, Recreation, and Open Space goals in the Comprehensive Plan because it "introduces" industrial operations to the Property ignores the fact that the site has historically been and continues to be zoned for industrial use, and that, notwithstanding this use, the site is adjacent to the existing regional trail system which connects the parks and recreation areas across the City through the St. Paul Grand Round and remains within the corridor for potential additional trails.³⁹ The Proposed Use is not anticipated to affect these features or efforts. As such, the Proposed Use is not wholly inconsistent with the City's goals on this topic.

Despite Appellant's stance that the Proposed Use must align with the policies of the Comprehensive Plan, the Appeal also argues that the Proposed Use's consistency with the Comprehensive Plan is in violation of several other City-adopted plans which should instead control land use of the Property. However, this argument misstates the legal priority and underlying goals of the Comprehensive Plan and should be rejected. FCC does not dispute that industrial land use guidance in the Comprehensive Plan acknowledges other "City of Saint Paul adopted plan[s]," or that aspects of other city plans outline potential goals for redevelopment of the Property and adjacent properties thereto. However, Minnesota law clearly states that:

*[C]omprehensive plans control over small area plans because of the statutory framework of city planning, the history of cities and neighborhoods in city planning, and caselaw guidance detailing a city's role in comprehensive plans.*⁴⁰

Unless stated otherwise, the City's broad power in city planning and adopting comprehensive plans control over other city plans.⁴¹ The language of the Comprehensive Plan is consistent with this precedent, stating that the Comprehensive Plan will prevail in the event of a conflict of policy between the Comprehensive Plan and other plans adopted through the City Council, including, but not limited to, the Mississippi River Corridor Plan adopted in 2002 (the "**MRCP**"), the Great River Passage Plan adopted in 2013 (the "**GRPP**"), the Bicycle Plan, the Pedestrian Plan, and District Plans.⁴² The allegation that the Proposed Use is inconsistent with any of these plans and therefore the Comprehensive Plan undermines the priority of the Comprehensive Plan's guidance. In the event of a conflict in policy, the City has made clear that "the Comprehensive Plan will prevail."⁴³ As documented in the Staff materials related to this Appeal, all of the other city plans referenced

³⁹ 2040 Comprehensive Plan at 114, Map P-3.

⁴⁰ *Neighbors for E. Bank Livability*, 915 N.W.2d at 511. Note that, in the context of this case, the term "small area plan" was used to reference plans for designated land use features. *Id.* at 507. In the Comprehensive Plan, this type of "plan" is referenced as "other city plans." 2040 Comprehensive Plan at 17.

⁴¹ *See id.* at 513.

⁴² *See* 2040 Comprehensive Plan at 17, 238.

⁴³ *See* 2040 Comprehensive Plan at 17.

by Appellant were prepared with reference to outdated, now-decertified comprehensive plans.⁴⁴ Despite the fact that the 2040 Comprehensive Plan was adopted more recently than most, if not all, of the other city plans, Appellant argues that industrial guidance of the Property is an “oversight.” Rather, as the Staff Report acknowledges, this fact supports the conclusion that industrial use of the Property is most consistent with the City’s current goals for the site. Therefore, Staff did not err in determining that the Proposed Use is consistent with the Comprehensive Plan.

Notwithstanding the foregoing, to the extent the Planning Commission considers the other City plans flagged by Appellant, the arguments set forth in the Appeal misrepresent the purpose of these plans. For example, the MRCP indicates that the City supports continuation of industrial uses in appropriate portions of the river corridor.⁴⁵ The MRCP clearly acknowledges that the Property is located near and/or within the terrace topography near the river valley, which is generally characterized by mixed-use commercial and industrial lands, as well as mixed housing.⁴⁶ For the numerous reasons described above, the Proposed Use of the Property is consistent with this characterization. While the surrounding area near the Property is identified as a “Study Area” for potential redevelopment,⁴⁷ the MRCP acknowledges that suggested guidelines for these areas should not be viewed as mandates.⁴⁸ Similarly, the GRPP acknowledges that:

*Until such time as the City purchases any of the sites or areas, or enters into a development agreement for the sites or areas, covered in the vision/concept plans, private property owners may use their properties for any legal use permitted under the current zoning classification, provided that the proposed use meets all applicable conditions and/or standards.*⁴⁹

The Fort Road Development Plan adopted in 2005, which identifies development near and around the Randolph/West Seventh Neighborhood Node, clearly states that the suggestions are intended to depict potential “redevelopment scenarios” to help guide development, but are not meant to foreclose other possible scenarios involving similar land uses and development intensities.⁵⁰ As the Staff Report discusses, the City has not taken any affirmative steps to implement these potential redevelopment scenarios in its most current guidance for the Property,⁵¹ despite the availability of these suggestions for years prior to the current Comprehensive Plan’s adoption. Given this, FCC should not be forbidden from pursuing a permitted use within its current and future guided zoning district purely because these concepts were suggested in the past without any implementation in the interim.

⁴⁴ 560 Randolph Appeal Staff Report Packet, *Comprehensive Plan Summary for 560 Randolph Avenue* (Feb. 7, 2025).

⁴⁵ MRCP at 30.

⁴⁶ MRCP at 17.

⁴⁷ MRCP at 31.

⁴⁸ MRCP at 49.

⁴⁹ GRPP at 5.

⁵⁰ Fort Road Development Plan at 3.

⁵¹ Staff Report, Finding 2(d).

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 Statement of Clarification, the review process followed by Staff in finding that the Proposed Use is similar to a public works yard or maintenance facility satisfies the four (4) standards for a similar use determination set forth in Code Section 61.106. The Appeal fails to provide any evidence of error in Staff's determination that the Proposed Use complies with the requirements of the Code and the Comprehensive Plan.

Accordingly, FCC respectfully requests that the Zoning Committee recommend, and the Planning Commission decide, to deny the Appeal and affirm Staff's similar use determination for the Proposed Use of the Facility.

Very truly yours,

/s/ Daniel Rumsey

Daniel Rumsey
Regional Vice President
FCC Environmental Services

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



Abundant housing, low-carbon transportation, and sustainable land use
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2/9/2025

Public Hearing Testimony to the Zoning Committee

RE: Appeal of Determination of Similar Use for 560 Randolph — #25-005-778

Chair Taghioff & Members of the Zoning Committee,

Sustain Saint Paul is a volunteer-led, grass-roots organization that champions abundant housing, low-carbon transportation, and sustainable land use in Saint Paul. We submit this testimony on behalf of the Board, members and advocates that make up our organization.

We write to formally support the Fort Road Federation appeal to overturn the Determination of Similar Use for the proposed development at 560 Randolph Avenue by FCC Environmental Services.

The arguments submitted in the appellant's January 16th, 2025 letter clearly articulate the compelling legal basis to overturn the City's January 10th, 2025 Statement of Clarification.

City staff erred in their conclusion that the proposed use - a dispatch, refueling and maintenance facility for ~80 garbage trucks - is similar to a public works yard or maintenance facility. Upon close examination, the similarities are superficial at best. Furthermore, the proposed use is incompatible with surrounding zoning and land use, and is inconsistent with the City's Comprehensive Plan, its adopted policies and the adopted small area plan for the location.

Incompatibility with Surrounding Zoning and Land Use

The site at 560 Randolph Avenue is zoned I1 Light Industrial but is surrounded by T2 and T3 zoning districts, as well as a small area of Transitional Industrial zoning. The proposed operation of 36 to 80 garbage trucks entering and exiting the site daily would introduce significant external impacts, including increased noise and traffic congestion. These impacts are incompatible with the intent of I1 zoning, which aims to accommodate industrial operations whose external effects are limited to the district and do not negatively impact surrounding areas. The proximity of the site to traditional neighborhood districts further exacerbates these issues.

Traffic and Safety Concerns

The proposed facility's traffic patterns are incompatible with the area's evolving residential and mixed-use character. The 2040 Comprehensive Plan prioritizes pedestrian-friendly design and transit-supportive density in Neighborhood Nodes like Randolph-W. 7th/Schmidt. Additionally,

the Saint Paul Pedestrian Plan identifies this area as a priority for walking investments, while the Saint Paul Bike Plan proposes dedicated bike paths along Randolph Avenue.

The introduction of heavy vehicle traffic raises substantial safety concerns for pedestrians and cyclists. Such operations would conflict with the city's stated multimodal transportation goals, undermining efforts to create a safer and more accessible environment for non-motorized road users. This increased truck activity is at odds with the city's broader vision for neighborhood connectivity and investment in pedestrian- and bike-friendly infrastructure.

Inconsistency with the Comprehensive Plan

The determination that the proposed use aligns with the 2040 Comprehensive Plan is flawed. 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, addenda to the 2040 Comprehensive Plan—including the Great River Passage Plan, the Mississippi River Corridor Plan, and the Fort Road Development Plan—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.

Through the adoption of these small area plans and other city plans, this property and the surrounding area were intended to be rezoned to reflect the vision of the community and the city. The fact that this site remains zoned industrial today is an oversight—one that the community intends to address quickly and urgently.

Environmental Impact

The proposed facility's operations may superficially resemble a public works yard or maintenance facility, but they fundamentally diverge in character and purpose. Unlike public works facilities, which prioritize municipal service delivery, FCC's private operations would generate environmental and operational impacts inconsistent with the community-oriented vision for this site. The daily operation of a large fleet of garbage trucks would contribute to air and noise pollution, adversely affecting the quality of life for nearby residents and contradicting the city's sustainability goals.

Conclusion

Given these significant discrepancies and the potential adverse impacts of the proposed use, we respectfully request the following actions:

1. **Findings & Recommendation to the Planning Commission:** Find that the proposed development is not a similar use as other permitted uses in an I1 district, and

recommend that the Planning Commission overrule the City staff determination for 560 Randolph Avenue in light of the inconsistencies outlined in this appeal and the site's alignment with key city plans.

2. **Rezoning Study:** Initiate a rezoning study for 560 Randolph Avenue and surrounding areas with the intention to align zoning with community and City vision outlined in the aforementioned adopted City plans.

We believe these steps are crucial to aligning the development of 560 Randolph Avenue with the vision of the City of Saint Paul and Sustain Saint Paul for sustainable, equitable, and community-focused growth.

Thank you for your attention to this appeal. Sustain Saint Paul remains committed to advocating for development that reflects our community's values and aligns with city planning goals.

Sincerely,

Sustain Saint Paul Board of Directors

Melissa Wenzel, co-chair

Cody Fischer

Luke Hanson, co-chair

Paul Fiesel

Zack Farrell, treasurer

Chris Smith

Michel Molstead co-secretary

Faith Krogstad

From: [Connor Lynch](#)
To: [*CI-StPaul_ZoningCases](#); [Rebecca Noecker](#); [Jaime Tincher](#); [Nicolle Newton](#); [Sean Kershaw](#)
Subject: Opposition Trash Project @ 560 Randolph
Date: Sunday, February 9, 2025 4:03:23 PM

You don't often get email from cjlynch16@gmail.com. [Learn why this is important](#)

Dear Members of the Zoning Committee,

My name is Connor J. Lynch, and I live at 659 Watson Ave in the West 7th neighborhood. I am writing to express my absolute opposition to the proposed trash truck facility at 560 Randolph Avenue. This project contradicts my family values, the city-adopted plans, sacrifices valuable redevelopment opportunities, and threatens the livability of our community.

Key Concerns:

Contradiction with City Plans:

City-adopted plans, such as the Mississippi River Corridor Plan and the Great River Passage Plan, prioritize mixed-use redevelopment, public green space, and improved access to the riverfront. The proposed FCC Environmental Services facility directly conflicts with this vision.

Loss of Redevelopment Potential:

This site has long been recognized as a key opportunity for housing, public spaces, and pedestrian-friendly development. Approving this facility would undermine years of planning and public engagement, permanently forfeiting the chance to realize the community's vision.

Harm to Neighborhood Livability:

The daily operations of up to 80 garbage trucks—an estimate provided by FCC GM Greg Revering—would introduce excessive noise, pollution, and traffic, 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.

As a gateway to West 7th, bordering a historic district and the river, this site deserves more thoughtful development that aligns with our shared priorities. I urge you to protect our neighborhood and its future by rejecting this proposal.

Sincerely,

Connor J. Lynch

659 Watson Ave - Saint Paul, MN

From: [Devin Fischer](#)
To: [*CI-StPaul_ZoningCases](#)
Cc: [Rebecca Noecker](#); [Jaime Tincher](#); [Nicolle Newton](#); [Sean Kershaw](#)
Subject: Opposition to Proposed Trash Truck Facility at 560 Randolph Avenue
Date: Sunday, February 9, 2025 1:45:44 PM

Dear Members of the Zoning Committee,

My name is Devin Fischer, and I live at 325 Daly Street in the West 7th neighborhood. I am writing to express my strong opposition to the proposed trash truck facility at 560 Randolph Avenue. This project contradicts city-adopted plans, sacrifices valuable redevelopment opportunities, and threatens the livability of our community.

Key Concerns:

Contradiction with City Plans:

City-adopted plans, such as the Mississippi River Corridor Plan and the Great River Passage Plan, prioritize mixed-use redevelopment, public green space, and improved access to the riverfront. The proposed FCC Environmental Services facility directly conflicts with this vision.

Loss of Redevelopment Potential:

This site has long been recognized as a key opportunity for housing, public spaces, and pedestrian-friendly development. Approving this facility would undermine years of planning and public engagement, permanently forfeiting the chance to realize the community's vision.

Harm to Neighborhood Livability:

The daily operations of up to 80 garbage trucks—an estimate provided by FCC GM Greg Revering—would introduce excessive noise, pollution, and traffic, 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.

As a gateway to West 7th, bordering a historic district and the river, this site deserves thoughtful development that aligns with our shared priorities. I urge you to protect our neighborhood and its future by rejecting this proposal.

Sincerely,
Devin Fischer
325 Daly Street

From: [Jenn P](#)
To: [*CI-StPaul_ZoningCases](#)
Subject: Re: Support of appeal brought by Fort Road Federation
Date: Tuesday, February 11, 2025 7:49:00 AM

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

One more piece: #24-102442

I am re-submitting this comment with information that was missing;
The comment applies to 560 Randolph Ave.

I am writing in support of the appeal, [appeal against the determination of similar use](#), of the Zoning Administrator's decision to issue a Statement of Clarification that a proposed solid waste truck dispatch center and maintenance facility is similar to a public works yard or maintenance facility.

As a teacher that commutes regularly along river road to reach Adams Elementary I often bike on Randolph past the site of this facility. I am more than disappointed that the city has abandoned the vision to create a greenway connection from West Seventh to the river as I see the potential for that daily on my bicycle. There's a site plan review that has to happen in this case. The location was identified in a neighborhood Small Area Plan adopted by both the city and district council as a potential site for residential development. All three versions of the city's "Great River Passage" master plan for Mississippi River development describe Randolph Avenue as a potential future greenway connection from West Seventh Street to the river — the most logical route for at least a mile in either direction. The site was never rezoned in accord with the plan and this needs to be corrected. The neighborhood deserves to be heard in this appeal.

Sincerely,
Jennifer Pierson
Resident and homeowner in St Paul, Highland Park

From: activist.6vss1@simplelogin.co
To: [*CI-StPaul_ZoningCases](#)
Subject: .Appeal for proposed solid waste truck dispatch center
Date: Monday, February 10, 2025 8:33:47 AM

You don't often get email from activist.6vss1@simplelogin.co. [Learn why this is important](#)

I am writing in support of the appeal about placing a garbage truck fueling facility at 560 Randolph Avenue. This is not in the best interest of the community.

That site has long been identified as a prime location for high-density housing within a short walk of the Keg and Case Market and other destinations along this key commercial corridor. The proposed garbage truck fueling station would fly in the face of these long-time plans to advance walkability and transit-oriented development along West Seventh.

I am not against development in general, I am against truck refueling when there needs to be housing and green spaces.

Please vote FOR the appeal.

Katherine DuGarm
1142 Norbert Lane
St. Paul, MN 55116

Sent with [Proton Mail](#) secure email.

From: [Kealani Caruso](#)
To: [*CI-StPaul_ZoningCases](#); [Rebecca Noecker](#); [jaime.tincher@stpaul.ci.stpaul.us](#); [Nicolle Newton](#); [Sean Kershaw](#)
Subject: Opposition to Proposed Trash Truck Facility at 560 Randolph Avenue
Date: Sunday, February 9, 2025 3:15:15 PM

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

Dear Members of the Zoning Committee,

My name is Kealani Caruso and I live at 659 Watson Avenue in the west 7th neighborhood. I am writing to express my strong opposition to the proposed trash truck facility at 560 Randolph Avenue. This project contradicts city-adopted plans, sacrifices valuable redevelopment opportunities, and threatens the livability of our community.i

Key Concerns:

Contradiction with City Plans:

City-adopted plans, such as the Mississippi River Corridor Plan and the Great River Passage Plan, prioritize mixed-use redevelopment, public green space, and improved access to the riverfront. The proposed FCC Environmental Services facility directly conflicts with this vision.

Loss of Redevelopment Potential:

This site has long been recognized as a key opportunity for housing, public spaces, and pedestrian-friendly development. Approving this facility would undermine years of planning and public engagement, permanently forfeiting the chance to realize the community's vision.

Harm to Neighborhood Livability:

The daily operations of up to 80 garbage trucks—an estimate provided by FCC GM Greg Revering—would introduce excessive noise, pollution, and traffic, 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.

As a gateway to West 7th, bordering a historic district and the river, this site deserves thoughtful development that aligns with our shared priorities. I urge you to protect our neighborhood and its future by rejecting this proposal.

Sincerely,

Kealani Caruso
659 Watson Ave
Saint Paul MN

From: [Brendan Harris](#)
To: [*CI-StPaul_ZoningCases](#)
Subject: Appeal of Determination of Similar Use for 560 Randolph Avenue - #24-102442
Date: Wednesday, February 12, 2025 11:26:36 PM

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

City of Saint Paul Department of Safety and Inspections
Zoning Section, Attention: Yaya Diatta, Zoning Administrator
375 Jackson Street, Suite 220
Saint Paul, MN 55102
Subject: Appeal of Determination of Similar Use for 560 Randolph Avenue - #24-102442

Dear Mr. Diatta,

The proposed trash truck facility at 560 Randolph Ave. does not reflect the vision our community has for a vibrant and thriving West 7th. Multiple City-adopted plans over the years have supported this vision. When planning and community input are overlooked, the future of Saint Paul, our riverfront, and West 7th looks uncertain. West 7th, and our community, deserves a better future.

Thanks,

- Brendan Harris
286 w forbes ave st paul 55102
952-457-4597

- Brendan Harris
952-457-4597

From: [Gemma Weston](#)
To: [*CI-StPaul_ZoningCases](#); [Rebecca Noecker](#); [Jaime Tincher](#); [Nicolle Newton](#); [Sean Kershaw](#)
Subject: Opposition to Proposed Trash Truck Facility at 560 Randolph Avenue
Date: Thursday, February 13, 2025 11:21:12 AM

You don't often get email from gschlott2015@gmail.com. [Learn why this is important](#)

Dear Members of the Zoning Committee,

My name is Gemma, and I live at 876 7th St West at the Schmidt Artist Lofts. 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:

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.

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.

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,
Gemma Weston
876 7th St West, Apt. 308, Saint Paul, MN 55102

From: [Lawrence Lawyer](#)
To: [*CI-StPaul_ZoningCases](#)
Cc: [Rebecca Noecker](#); [Jaime Tincher](#); [Nicolle Newton](#); [Sean Kershaw](#)
Subject: Opposition to Proposed Trash Truck Facility at 560 Randolph Avenue
Date: Thursday, February 13, 2025 2:52:34 AM

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

Dear Members of the Zoning Committee:

My name is Lawrence W. Lawyer, and I live in the West 7th neighborhood, first moving here in 1988. I am writing to express my fervent opposition to the proposed trash truck facility at 560 Randolph Avenue. This project rejects city-adopted plans to improve livability, surrenders the possibility of cutting-edge redevelopment opportunities, and ignores the vision to celebrate the wonders of the Mississippi River through thoughtful infrastructure.

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. **Please** respect the many years of planing already achieved. **Please** be visionary to enhance the city and ennoble her people.

Sincerely,

Lawrence W. Lawyer

1575 Race Street

St. Paul, MN 55102

Dear Members of the Zoning Committee,

My name is Nicole Kitzhaber and I live at 401 Goodrich Ave, St Paul, 55102. I am writing to express my strong opposition to the proposed trash truck facility at 560 Randolph Avenue. My husband and I are currently looking to buy another house in the West 7th neighborhood to build a life together in a larger house than we currently have, and though we don't live near where the garbage site is planned, it greatly effects our options for affordable housing in the area if passed. We currently live in a home built in 1890 and the the West 7th neighborhood has some of the oldest houses in Minnesota. From experience we can tell you that these homes are not very sound-proof and so a quiet neighborhood is highly needed in this area. I also know that this neighborhood is one of the most affordable and walkable neighborhoods in the city and that is a very valuable asset for my husband and I and for people in the area. Our neighborhood has been through a lot and we deserve to have a peaceful place to call home. Please consider these points when referring to the next section.

This project conflicts with city-adopted plans, sacrifices valuable redevelopment opportunities, and threatens the livability of the West 7th neighborhood.

Key Concerns:

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.

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.

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,
Nicole Kitzhaber
401 Goodrich Ave St. Paul, MN 55102

From: [Paula Tressler](#)
To: [*CI-StPaul_ZoningCases](#); [Rebecca Noecker](#); [Jaime Tincher](#); [Niolle.Newton@ci.stpaul.mn.us](#); [Sean Kershaw](#)
Subject: Re: Opposition to Proposed Trash Truck Facility at 560 Randolph Avenue
Date: Thursday, February 13, 2025 9:08:17 AM

You don't often get email from 1246holly@gmail.com. [Learn why this is important](#)

ADDENDUM: I was requested to add the Zoning Case File to my letter regarding the property at **560 Randolph Avenue**.

ZONING CASE FILE: 25-005-778.

Thank you.

Paula Tressler
395 Colborne Street
St. Paul, MN 55102

On Thu, Feb 6, 2025 at 2:07 PM Paula Tressler <1246holly@gmail.com> wrote:

Paula Tressler <1246holly@gmail.com>

12:51 PM (10 minutes ago)

to [ZoningCases](#), [rebecca.noecker](#), [jaime.tincher](#), [Nicolle.Newton](#), [Sean.Kershaw](#)



Dear Members of the Zoning Committee,

I am writing to express my deep concern regarding the proposed trash truck facility at 560 Randolph Avenue. This facility is incompatible with our neighborhood, and likely with any neighborhood within the City limits of St. Paul.

The proposed FCC Environmental Services facility runs counter to the City-adopted plans such as the Mississippi River Corridor Plan and River Passage. This area, especially between West Seventh and Shepard Road, has long been envisioned as a connection to the Mississippi River Walk, with housing, green space, and safe pedestrian and biking access. This plan aligns with our broader goals to increase access to public transportation, including the nearby Randolph/West 7th Metro Transit, which serves the 54 express route to the airport and Mall of America.

Having garbage and recycling trucks serve our neighborhood just once per week was a significant improvement in reducing noise and congestion. Allowing the FCC Environmental Services facility in our community would set us back several years and undo the progress we've made in making our neighborhood a more livable place. The potential for increased noise, truck traffic, and air pollution is deeply concerning.

Additionally, our neighborhood is historically significant, with St. Paul's origins lying in the area around the proposed facility. Residents have worked tirelessly to preserve and improve the area. This site should remain aligned with the plans for redevelopment—plans that benefit all St. Paul residents by providing greater access to the Mississippi River corridor. We should not allow an industrial facility to detract from the beauty and promise of this important space.

I urge you to consider the long-term impact on our community and our shared vision for St. Paul's future. This facility is not a good fit for our neighborhood or for the city as a whole. We deserve a future that supports both environmental sustainability and vibrant, accessible spaces for all citizens to enjoy.

Sincerely,

Paula Tressler

395 Colborne St.

St. Paul, MN 55102

952-894-5846

From: [S. Moss](#)
To: [*CI-StPaul_ZoningCases](#)
Cc: [Rebecca Noecker](#); [Jaime Tincher](#); Nicole.newton@ci.stpaul.mn.us; julia@fortroadfederation.org
Subject: Please do not allow proposed task truck facility at 560 Randolph
Date: Wednesday, February 12, 2025 9:42:34 PM

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

Hello City officials,

My name is Stephanie Moss and I live at 56 Leech St.

I am writing to express my very 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.

So very tired of witnessing residents organize in significant ways - only for the Councilperson from that area being the only one to vote along the lines of residents and all others vote the opposite.

Not EVERY single new proposed business expansion is a good thing for the city. Think about the smell. Think about the metals facility in North Minneapolis - which was shown to cause long lasting health effects on that neighborhood. (<https://sahanjournal.com/community-voices/northern-metal-recycling-minneapolis-parks-and-recreation-environmental-justice/>).

All of that traffic and noise and exhaust pollution (80 trucks!!) will be 0.5 miles from Bridgeview School - which serves children with special needs (and often specific and multiple health issues).

Harvard's Center of the Developing Child points out that "Place Matters". Young children's development can easily become negatively effected by neighborhood infrastructure, air quality, exposure to toxins/hazards (exhaust and exponentially increased Street traffic caused by trash trucks).
<https://developingchild.harvard.edu/resources/infographics/place-matters-what-surrounds-us-shapes-us/>

Systemic racism and structural inequities are obvious in how businesses are allowed to "break the rules" to benefit themselves and their bottom line.

This site would pollute the air with exhaust and excessive noise in a historic district that is extremely close to the river.

Allowing it to move into our neighborhood would be yet ANOTHER zoning change in favor of businesses over residents. It also would go against the Mississippi River Corridor Plan, the 2040 Comprehensive Plan, Great River Passage Plan, and Fort Road Development plan.

Please be Leaders and show businesses that PLACE MATTERS to us in Saint Paul, and residents and neighborhoods are and will continue to be more valuable than corporations.

Sincerely
Stephanie Moss

From: maudalvl@gmail.com
To: [*CI-StPaul_ZoningCases](#)
Cc: [Rebecca Noecker](#); [Jaime Tincher](#); [Nicolle Newton](#); [Sean Kershaw](#)
Subject: Opposition to Proposed Trash Truck Facility at 560 Randolph Avenue
Date: Thursday, February 13, 2025 11:01:15 AM

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

Dear Members of the Zoning Committee,

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: [TBoard](#)
To: [*CI-StPaul_ZoningCases](#)
Cc: [Rebecca Noecker](#); [Jaime Tincher](#); [Nicolle Newton](#); [Sean Kershaw](#)
Subject: Opposition to Proposed Trash Truck Facility at 560 Randolph Avenue
Date: Thursday, February 13, 2025 11:43:54 AM

You don't often get email from tboard65@gmail.com. [Learn why this is important](#)

My name is **Teresa Boardman**, and I live at **105 Leech Street**. 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:

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.

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.

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,
Teresa Boardman

105 Leech Street, St. Paul, MN

Teresa Boardman

tboard65@gmail.com

From: [Liam Bard](#)
To: [*CI-StPaul_ZoningCases](#)
Cc: [Rebecca Noecker](#); [Jaime Tincher](#); [Nicolle Newton](#); [Sean Kershaw](#)
Subject: Opposition to Proposed Trash Truck Facility at 560 Randolph Avenue
Date: Tuesday, February 11, 2025 8:28:56 PM

You don't often get email from bardliam90@gmail.com. [Learn why this is important](#)

Dear Members of the Zoning Committee,

My name is Liam Bard, and my wife and I live at 329 Daly Street in the West 7th neighborhood. I am writing to express my strong opposition to the proposed trash truck facility at 560 Randolph Avenue. This project contradicts city-adopted plans, sacrifices valuable redevelopment opportunities, and threatens the livability of our community.

Key Concerns:

Contradiction with City Plans:

City-adopted plans, such as the Mississippi River Corridor Plan and the Great River Passage Plan, prioritize mixed-use redevelopment, public green space, and improved access to the riverfront. The proposed FCC Environmental Services facility directly conflicts with this vision.

Loss of Redevelopment Potential:

This site has long been recognized as a key opportunity for housing, public spaces, and pedestrian-friendly development. Approving this facility would undermine years of planning and public engagement, permanently forfeiting the chance to realize the community's vision.

Harm to Neighborhood Livability:

The daily operations of up to 80 garbage trucks—an estimate provided by FCC GM Greg Revering—would introduce excessive noise, pollution, and traffic, 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.

As a gateway to West 7th, bordering a historic district and the river, this site deserves thoughtful development that aligns with our shared priorities. I urge you to protect our neighborhood and its future by rejecting this proposal.

Sincerely,

Liam and Acacia Bard
329 Daly Street

From: [Sarah Bauer](#)
To: [*CI-StPaul_ZoningCases](#)
Subject: 25-005-778 Waste truck dispatch center
Date: Wednesday, February 12, 2025 12:01:08 PM

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

I am writing to oppose the planned waste truck dispatch center at 540 Randolph Avenue.

One of the major factors leading to me buying a house in the West Seventh neighborhood is that I work in the neighborhood as well. My office is on Randolph, just across Shepard road. For myself and most other residents, in order to get to the area near the river we must cross Shepard at Randolph or be forced to drive through downtown to take a much longer alternate route. The impact of a waste truck dispatch center on that corner would be devastating to anyone needing to access that crossing. It already is difficult to safely turn left from Webster Street onto Randolph and if there are trucks coming and going, it will lead to increased traffic and decreased visibility.

The Sam Morgan Regional Trail starts on that corner as well and is frequently used by residents and visitors to the neighborhood. I would rather see the corner developed into something more pedestrian and bike friendly that adds to the neighborhood-- not a truck yard adding noise and congestion.

Thank you,
Sarah Bauer
222 Colborne St

From: [Diane](#)
To: [*CI-StPaul_ZoningCases](#)
Subject: Oppose Garbage Trucks at 560 Randolph
Date: Thursday, February 13, 2025 12:36:19 PM

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

We stand with the rest of the neighborhood is saying that we Do NOT want the trash truck site at 560 Randolph Avenue. This neighborhood has become such a great place to live for families and that was not in the long term vision. You may feel free to contact any of us below.

Diane Caruso
1105 Homer Street
St. Paul, MN 55116

Evangeline Goldschmitz
679 Watson Avenue
St. Paul, MN 55102

Linda Goldschmitz
679 Watson Avenue
St. Paul, MN 55102

Andrea Caruso
674 Watson Avenue
St. Paul, MN 55102

One of us can be reached at 612-701-6734

We appreciate the opportunity to voice our concerns for NO

Thank You!

From: [Kim Hyers](#)
To: fortroadfed@fortroadfederation.org; [#CI-StPaul_Ward2](#); [*CI-StPaul_ZoningCases](#)
Cc: [Meg Duhr](#); [darrent tobolt](#); [Dean Hyers](#)
Subject: Opposition to the Proposed Garbage Truck Facility at 560 Randolph Ave. A Missed Opportunity for Riverfront Development
Date: Thursday, February 13, 2025 1:04:52 PM

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

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. As a 15 year resident of this area, I'm saddened, but not surprised, that this is even a consideration. I am unable to attend meetings in person, being out of state at the moment, so I want to share my thoughts with you here.

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.

Closer to home, a Strong Towns 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 as a Neighborhood Node in the St. Paul Land Use plan from 2020 planning guide. Nothing in the planning supports putting an industrial garbage facility here. Here are just a few directives that go against industrial use on this site from your very own document, there are many more to choose from.

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 complem

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, Dean 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)

- St. Paul Land Use 2020 edition https://www.stpaul.gov/sites/default/files/2021-06/LandUse_Chapter_FinalAdopted_110920.pdf

From: [Richard Harnden](#)
To: [*CI-StPaul_ZoningCases](#)
Subject: Case #25-005-778, 560 Randolph Appeal
Date: Wednesday, February 12, 2025 6:24:46 PM

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I do not want this APPEAL to go through due to increased commercial truck traffic, smells of garbage and the potential to decrease my property value. The public is NOT going to come to my business for a used vehicle when the additional smell and garbage trucks appear around my place of business. My taxes are high enough and I do not see any benefits. Will this actually increase my property taxes? This appeal is not good for the entire neighborhood.

Richard Harnden
RH Auto Sales
459 Toronto St.
St. Paul, MN. 55102