

**From:** [Kaleb McCulloch](#)  
**To:** [CouncilHearing \(CI-StPaul\)](#)  
**Cc:** [John Perlich](#)  
**Subject:** St. Paul Area Chamber's Public Comments on Ord. 24-26  
**Date:** Friday, November 8, 2024 9:52:32 AM  
**Attachments:** [image001.png](#)  
[SPAC\\_Ord.\\_24-26\\_Drive Thru Amendments\\_Public Comment\\_11.13.24.pdf](#)

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You don't often get email from [kaleb@stpaulchamber.com](mailto:kaleb@stpaulchamber.com). [Learn why this is important](#)

Hello,

I have attached the St. Paul Area Chamber's public comments on Ordinance 24-26 regarding zoning amendments for drive-thrus in advance of the November 13 public hearing. Please let me know if you have any questions.

Best,

Kaleb McCulloch



Kaleb McCulloch  
Senior Director of Government Affairs  
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November 13, 2024

Council President Mitra Jalali  
Councilmember Anika Bowie  
Councilmember Rebecca Noecker  
Councilmember Saura Jost

Council Vice President Hwa Jeong Kim  
Councilmember Nelsie Yang  
Councilmember Cheniqua Johnson

### **Re: Ordinance 24-26 Zoning Code Amendments for Drive-Thrus and Walk-up Services**

Dear Council President Jalali and Councilmembers:

On behalf of the St. Paul Area Chamber and our 1,700+ members and affiliates, I write to express our opposition to Ordinance 24-26 regarding zoning code amendments for drive-thrus and walk-up services.

**Restricting future drive-thrus will negatively affect businesses and residents by removing a key component of modern convenience, safety, and efficiency.** Drive-thrus are popular because they allow customers to quickly access services without exiting their vehicles, which boosts service speed and increases customer turnover. COVID showed drive-thrus as a necessity to customers and businesses alike. Eliminating this option will remove a business's ability to continue serving customers while providing a safer environment for staff during workforce shortages and safety concerns. These zoning code amendments won't change consumer behaviors - any environmental benefit would be negated by customers driving further to access a drive-thru or relying more on delivery platforms.

**This broad prohibition will tell retailers - "no thank you," at a time when we should be doing all we can to welcome, invite, and make room at the table.** From my season at the Port Authority, I worked with several companies that walked away from Saint Paul because they simply couldn't find locations for drive-thru service. Each of these companies wanted to bring jobs, tax base, and expanded services to Saint Paul. They went elsewhere. The City needs to promote an environment that attracts new jobs, not create more restrictions that limit consumer choice and hinder economic development.

**When looking into the details of this ordinance, more questions are raised than answered.** It removes a business's legal right to a drive-thru if it is out of operation for over a year but does not define what starts that clock. Does it start the day the building is sold to a new owner? What if the building burns down through the fault of no one? Can the location be sold to a different business that wants to maintain the drive-thru? Will a business be able to make safety and technology upgrades to better serve customers without their drive-thru becoming a non-conforming structure? Do interior



lobby or storefront upgrades impact the status of a drive-thru service lane? There is no definite statutory language that clarifies these details, only a lack of certainty on how the city is going to enforce the ordinance.

**Drive-thrus are a core component of many businesses.** A quick-service chain testified at the Planning Commission that 80% of their sales are from the drive-thru - reaching 90% during COVID. Other businesses would struggle to stay open when they are critically short-staffed. Drive-thrus are a need-to-have, not just a nice-to-have for businesses.

**Lack of clarity regarding upgrades to existing drive-thrus will leave businesses with outdated buildings, harming property values and customer experience.** The city must leave room for future technological improvements that enhance service for customers and communities. For example, many banks still rely on inefficient tube systems. As banks are renovated, they incorporate remote tellers to serve customers without on-site staff. This allows businesses to offer modern services to their customers, and they'll view their inability to upgrade as a significant barrier.

**Mandating walk-up service or lobbies to match drive-thru hours will also present challenges.** Businesses base their operations on demand. Adding this requirement when demand does not dictate it will force businesses to choose between overstaffing or cutting operating hours.

**Saint Paul should be increasing access to pharmacies and financial institutions instead of limiting them.** These are essential services that communities rely on. Especially as the number of pharmacy deserts continue to grow in Saint Paul and across the state. Creating policies that make it more difficult for them to expand is going to exacerbate that problem - a problem that urgently requires action.

**The St. Paul Area Chamber certainly understands that some locations are not a good fit for a drive-thru operation due to infrastructure design and traffic patterns.** There may be merit in discussing what is the appropriate number of required stacking spaces or distance from transit stations. However, disallowing future drive-thrus is akin to using a sledgehammer to swat a fly.

**The Starbucks on West 7th Street demonstrates how a business can successfully build a drive-thru within the current zoning codes.** They redeveloped an underutilized parking lot while prioritizing pedestrian safety and avoiding traffic congestion. We should encourage examples like this, not punish them.



# ST PAUL

## AREA CHAMBER

401 N Robert Street, Suite 150  
St. Paul, MN 55101

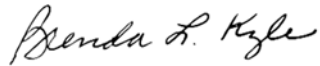
MAKING CONNECTIONS THAT COUNT

Saint Paul is dealing with escalating taxes and a shrinking tax base. This ordinance will hinder new businesses and future economic growth. The city needs strategies that promote business expansion, increase the property tax base, and attract new companies. I urge the Saint Paul City Council to reject this ordinance and focus on policies that support sustainable economic development.

As this proposal stands, we ask you to oppose Ordinance 24-26

Thank you for your time and attention to this matter. Please don't hesitate to reach out if you have any questions.

Sincerely,



B Kyle  
President and CEO  
Saint Paul Area Chamber



**From:** [Tim Diegel](#)  
**To:** [\\*CI-StPaul>Contact-Council](#)  
**Subject:** Medical effects of drive-up windows  
**Date:** Friday, November 8, 2024 4:58:38 PM

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You don't often get email from [timdiegel@mac.com](mailto:timdiegel@mac.com). [Learn why this is important](#)

There are some US cities (CA) that have banned new coffee and eating establishments with drive-up windows due to constant exposure to Air Pollution to the surrounding areas. Everyone realizes that Starbucks will have a constant line of waiting cars during the day numbering up to 8 or more. This effect can be added to the St. Paul City Council's discussion regarding drive-up windows Tim Diegel, MD Edina, MN

This is what what one car contributes:

Idling a car for 10 minutes produces a variety of air pollutants, including:

- **Carbon monoxide:** 11.87 grams
- **Nitrogen oxide:** 0.59 grams
- **Volatile organic compounds:** 0.45 grams
- **Total hydrocarbons:** 0.53 grams



Idling a car for 10 minutes also wastes about 20% of a gallon of gas

### **How does idling affect health?**

Pollutants emitted by vehicle tailpipes can enter the body and impact brain, heart, and lung function. They can affect pregnancy outcomes, lower life expectancy, and impact the risk for obesity and diabetes.

### **Who is most at risk?**

Infants and young children

Pregnant people

Older people (65 & older)

People with pre-existing conditions

Communities with poor air quality

### **Here are some tips to help enforce anti-idling laws in New York City:**

Some cities have anti-idling laws. New York City fines people (\$100-\$2000) who idle their vehicles for more than 1 minute outside a of a school, or 3 minutes in the rest of NYC.

- Anonymously report an idling vehicle, other than an authorized emergency vehicle, by calling 311.
- [NYC Citizens Air Complaint Program](#) – Submit a time-stamped video

or photo of a truck or bus idling for 3 minutes to the NYC Department of Environmental Protection. You can be awarded 25% of the fine for your enforcement efforts.

**From:** [Luke Hanson](#)  
**To:** [\\*CI-StPaul\\_Contact-Council](#)  
**Cc:** [Sustain Saint Paul](#)  
**Subject:** Sustain Saint Paul supports drive-through amendments  
**Date:** Friday, November 8, 2024 1:29:44 PM  
**Attachments:** [2024.11.07 drive-through ordinance letter - SSP.pdf](#)

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Hi,

My name is Luke Hanson, and I'm a co-chair of the board of Sustain Saint Paul, a local advocacy organization. Attached to this email, please find our organizational public comment regarding the proposed amendments to the St. Paul Zoning Code regarding drive-throughs. Thank you, and please let us know if you have any questions.

Luke



Abundant housing, low-carbon transportation, and sustainable land use

# Sustain Saint Paul

PO Box 16164, Saint Paul, MN 55116

[www.sustainstpaul.org](http://www.sustainstpaul.org) | [info@sustainstpaul.org](mailto:info@sustainstpaul.org)

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## Board of Directors

November 7th, 2024

Luke Hanson  
Co-Chair

Council President Jalali and Councilmembers,

Melissa Wenzel  
Co-Chair

Sustain Saint Paul is a volunteer-led, grass-roots organization that champions abundant housing, low-carbon transportation, and sustainable land use in the City of Saint Paul. We strongly support the proposed amendments to the City's zoning regulations regarding drive-throughs and urge you to pass them.

Michele Molstead  
Secretary

Zack Farrell  
Treasurer

Karen Allen

Galen Benshoof

Paul Fiesel

Cody Fischer

Faith Krogstad

Chris Smith

The City of Saint Paul has set ambitious goals to advance the sustainability, health, safety and prosperity of our city. Drive-throughs, particularly those operated by restaurants, run counter to these objectives. Drive-throughs make Saint Paul's streets and sidewalks less hospitable and more hazardous for all residents, especially those walking, rolling, or biking nearby. They induce driving and thus inhibit Saint Paul's progress towards reducing transportation-related pollution and greenhouse gas emissions in the City – a key goal of the Climate Action Resilience Plan.

## Our Mission

Sustain Saint Paul champions abundant housing, low-carbon transportation, and sustainable land use in the City of Saint Paul through education, advocacy and political action, to ensure a more just and equitable city for all current and future residents.

Drive-throughs also fail to strengthen the City's economy and financial health. Unlike small businesses, which reinvest their profits in the City and create "multiplier effects," the profits of corporate drive-through restaurants are siphoned out of Saint Paul. They contribute little to the City's property tax base, by devoting most of their taxable land to asphalt. Meanwhile, businesses with drive-throughs often inflict greater wear-and-tear on taxpayer-funded streets than do other businesses. In the end, drive-throughs impose more costs for Saint Paul than the benefits they offer.

Thank you in advance for your continued work to make Saint Paul a more environmentally sustainable, healthy, and financially resilient city.

Sincerely,

Sustain Saint Paul's Board of Directors



**From:** [Jacob Weinand](#)  
**To:** [\\*CI-StPaul>Contact-Council](#)  
**Subject:** Ordinance 24-26 Zoning Code Amendments Comment Letter  
**Date:** Friday, November 8, 2024 5:30:27 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[Ordinance 24-26 Zoning Code Amendments Wings Credit Union Comment Letter 11.08.2024.pdf](#)

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You don't often get email from [jacob.weinand@wingsfinancial.com](mailto:jacob.weinand@wingsfinancial.com). [Learn why this is important](#)

Good evening, Council Members.

Please find attached, Wings Credit Union Comment Letter regarding *amending Chapters 65 and 66 of the Legislative Code pertaining to drive-through sales and services and walk-up service windows*. This matter is currently on the November 13, 2024, City Council Meeting Agenda.

We appreciate your consideration. Please contact me with any questions or follow-ups.

Thank you,

Jake

**Jacob Weinand**  
VP – Associate General Counsel  
Wings Credit Union  
14985 Glazier Avenue, Apple Valley, MN 55124  
Phone: (952) 997-8416

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November 8, 2024

Council President Jalali  
15 Kellogg Blvd. W.  
Saint Paul, MN 55102

**Re: Ordinance 24-26 Zoning Code Amendments for Drive Throughs and Walk-up Services**

Dear Council President Jalali and the Saint Paul City Council,

I am writing on behalf of Wings Credit Union to express our opposition to the proposed amendments regarding drive throughs. These changes would hamper our ability to serve our Saint Paul members and community.

Wings is a member-owned, not-for-profit financial cooperative that serves nearly 270,000 members within the state of Minnesota. With over \$9.3 billion in assets, we are Minnesota's largest credit union with branches across the state, as well as three others. Our Saint Paul location is on West 7th Street and serves nearly 13,000 members within the Saint Paul community.

Wings is committed to providing outstanding experiences for our members, and drive throughs are an important part of this. They are an efficient, safe and convenient option for members of our community. Particularly those who may have challenges with in-person banking, whether it be due to physical impairments, parents with young children or someone simply trying to manage a busy schedule. Drive throughs proved especially important during the pandemic, allowing Wings to stay open and available to meet our members' needs.

Drive throughs also help ensure that members of our community have access to expanded financial services outside of traditional banking hours. At Wings, we recently upgraded our drive through at our Saint Paul location on West 7th Street with state-of-the-art technology to improve its safety and efficiency. This upgrade allows us to provide members with a full suite of banking services, beyond a standard ATM, during extended business hours.

Adding unnecessary regulations would limit the growth of community-based credit unions within Saint Paul. National banks have the economies of scale to help them absorb the added operating costs created by such ordinances. On the other hand, local credit unions operate on tighter margins and would need to compromise our member experience to remain in compliance.



For example, the proposal's requirement for equal walk-up and drive through services. At Wings, to provide equal services, we would likely need to limit the capability of our drive-through services during our current extended hours. This would have an outsized impact on individuals who are unable to visit our branch during normal operating hours. Instead, these individuals would be forced to visit another branch location outside of city limits. Ultimately, this may cause our members to switch to a national bank that can more easily absorb the costs associated with offering both walk-up and drive through services during extended business hours.

These outcomes do not seem consistent with the City Council's intentions but would be unintended consequences, which we have seen in other communities. The proposed zoning code amendments would negatively impact the Saint Paul community by limiting local credit unions' ability to provide services within the city. Therefore, we strongly urge the City Council to reconsider the proposal.

A handwritten signature in blue ink, appearing to read "Jacob Weinand", with a long horizontal line extending to the right.

Jacob Weinand  
Vice President – Associate General Counsel