

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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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



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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

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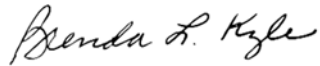
MAKING CONNECTIONS THAT COUNT

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

