

From: [John Purdy](#)
To: [*CI-StPaul Contact-Council](#)
Cc: [kristinemariongrill@mail.com](#); [lortega753@gmail.com](#); [Deb Montgomery](#)
Subject: Public comments under ORD 24-7 creating a Commercial Development District in Ward 4.
Date: Monday, February 12, 2024 2:12:16 PM
Attachments: [John Purdy February 12, 2024 Public Comments - ORD 24-7.pdf](#)

Dear Saint Paul City Council,

Please accept the attached written comments for posting to ORD 24-7, on the agenda for Wednesday, 2-14-2024 at 10:00 at the Capitol Region Watershed District Office, 595 Aldine St. in St Paul Ward 4.

If there are any questions please contact me either via email or on the landline phone listed below.

Thank you,

John Purdy
10 W Delos St.
St. Paul, MN 55107
651-292-9651

February 12, 2024

Public Comments of John Purdy for [ORD 24-7](#), creating a Commercial Development District in Ward 4

1. The proposed ordinance and map depiction in Exhibit 2, NE Quadrant 2, is not accurate because it includes seven (7) industrial parcels located on the west side of Prior Ave., north of Hewitt Avenue, which are not within or bounded by the named streets that describe Quadrant 2.
2. The proposed ordinance and map depiction in Exhibit 2 does not conform to the Planning Commission adopted resolution 23-38, dated December 8 2023 (Exhibit 5), because it does not include the [Comprehensive Neighborhood Planning Committee recommendation](#) to expand the west end of the proposed CDD from Eustis St. to the city limit at Emerald St. (Metro Transit Westgate Station, a 36 acre, 89 parcel area denoted by crosshatch in the CNP Committee recommendation).
3. The proposed CDD quadrant 2 will overlay earlier approved development districts established under [ORD 18-25](#), [ORD 16-21](#), and City Charter Section [17.07.1 \(1\)](#) (Amtrak [Appendix 6](#)) and calls into question the number of remaining license allotments that may be available under the proposed CDD.
4. Please note section 3 of the proposed ordinance, which reads: *"This district and its legal description shall appear in the Appendix to Chapter 409 of the Saint Paul Legislative Code."*

No Appendix to [Chapter 409](#) is published within the online Legistar. The City Charter does contain an [Appendix](#) but names only the original six Commercial Development Districts and would require Charter Commission action to update subsequent CDD creations.

As a result, new CDD's have not been described in the Legislative Code. Their existence can be found only by searching the legislative files listed below.

A good example of this opaque Council method can be found within [ORD 15-79](#), expanding the Downtown Commercial District to include a portion of the West Side within the area bounded by the Mississippi River and Plato/Fillmore Ave., and by Wabasha St. and Hwy. 52.

The City's own [website](#) even fails to recognize this Downtown expansion.

In conclusion, I request that the Council consider the following reasonable and necessary actions:

- 1) amend the ordinance to accurately map the boundaries in accordance with the description of Quadrant 2 (Northeast Quad);
- 2) amend the ordinance to accurately map and describe the inclusion of the Westgate expansion area within the proposed Commercial Development District to conform with Planning Commission findings;
- 3) provide an explanation of how the earlier CDD creations will affect total license issuance;
- 4) provide for an Appendix within Chapter 409 of the Legislative Code that describes all CDD locations.

Thank you,

John Purdy
10 W Delos St. St Paul, MN 55107
651-292-9651 or email jpmn0101@gmail.com

Appendix listing known Ordinances that have created or amended existing CDD's

[ORD 24-7](#) proposed creation for CEZ CCD District Quadrants.

[ORD 23-12](#) creating CDD for 1079 Rice St. Hi-Hi Reception Center.

[ORD 22-40](#) amending CDD at 2082 Ford Pkwy. (Chipotle) to include 2078 Ford Pkwy. Lund & Byerly bar.

[ORD 21-41](#) amending CDD Schmidt Brewery at W. 7th St. to remove all liquor license quantity limits.

[ORD 20-25](#) amending Hope Engine House at 1 Leech St. to include adjacent Residence Inn on Grand Ave.

[ORD 20-11](#) creating CDD for 974 W. 7th St. White Squirrel Bar.

[ORD 19-48](#) creating CDD for 197 Cesar Chavez La Costa Sports Bar.

[ORD 18-25](#) amending CDD at 755 Prior Ave. Can Can Wonderland to add an additional license.

[ORD 17-37](#) creating CDD at 1 Leech St. Hope Engine House.

[ORD 16-22](#) creating CDD at 929 W. 7th St. North Garden Theater.

[ORD 16-21](#) creating CDD at 755 Prior Ave. Can Can Wonderland.

[ORD 15-79](#) amending City Charter Section 17.07.1 Exhibit 1 Downtown District expansion to West Side.

[ORD 15-54](#) creating CDD at Schmidt Brewery at W. 7th St.

ORD 99-1179* creating CDD at 2082 Ford Pkwy. Chipotle Restaurant.

* Ord 99-1179 is attached to Ord 22-40. Any CDD ordinances passed before 2010 predate the Legistar database and are more difficult to locate.