From: Colleen O"Connor Toberman
To: CouncilHearing (CI-StPaul)
Subject: Public comment for 3/19 council agenda item APC 25-2
Date: Thursday, March 13, 2025 2:56:23 PM
Attachments: FMRComments560Randoph031225.pdf

Good afternoon,
I request that the attached public comment letter be shared with the city council regarding March 19 agenda item APC 25-2, the appeal of the Determination of Similar Use for 560 Randolph.

Please confirm that this will be included in the meeting packet. Thank you.

Colleen O'Connor Toberman / Land Use & Planning Program Director
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(she/her)

Friends of the Mississippi River
106 W. Water St., Ste. 600
St. Paul MN 55107-2032
FMR.org

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March 12, 2025

Dear Councilmembers:

On behalf of Friends of the Mississippi River (FMR), I appreciate the opportunity to share our support for the West 7th / Fort Road Federation's appeal of the Determination of Similar Use for 560 Randolph Avenue.

FMR is a non-profit organization with a mission to engage community members and other stakeholders to protect, restore and enhance the Mississippi River and its watershed in the Twin Cities region. We represent thousands of people in the metropolitan area who care deeply about the river, including over 6,000 who participate as FMR advocates, volunteers, and members each year.

Industrial expansions in riverfront environmental justice neighborhoods

The proposed 560 Randolph project, along with the rezoning of 10 River Park Plaza that the council will be voting on soon, display the same pattern: city disregard for neighborhood and riverfront plans that guide specific Mississippi riverfront sites to be redeveloped as mixed-use, people-oriented, and walkable.

City staff have apparently decided that these plans—developed with extensive community engagement and included as 2040 Comprehensive Plan addenda—are no longer valid, but without consulting the district councils involved in their creation. For both of these properties, the city is recommending industrial development that perpetuates environmental injustice and a disconnect between residents and the Mississippi River.

Conflicts with 2040 Comprehensive Plan

FMR is particularly concerned by the city's determination that the proposed FCC truck facility is consistent with St. Paul's Comprehensive Plan. Over the years, many city plans have affirmed the intention for the 560 Randolph site and the surrounding area to be redeveloped into mixed-use neighborhood node that enhances walkability, transit, and access to the Mississippi River.

Several 2040 Plan policies conflict with this proposed use within a designated Neighborhood Node like this site. The Plan also calls for improved connections between neighborhoods and the Mississippi River; industrial development conflicts with that goal.

Long-established plans that are official addenda to the 2040 Plan also clearly state intentions for this specific site to be redeveloped differently. These plans are still in effect; they are not secondary or outdated.

The Great River Passage Plan, adopted by the city in 2013, maps 560 Randolph and the surrounding parcels as intended for "river-oriented redevelopment opportunities." The plan states, "Utilize redevelopment to link the West 7th Street corridor to the river: Redevelopment of Island Station and the ADM site will provide a major missing piece to provide public access to and along the river between downtown and the Valley reach" (p. 67).

The Waterford Bay redevelopment at the former Island Station power plant site already represents a broken commitment to the neighborhood. The city did not seek to carry out the Great River Passage Plan vision for that site and in fact failed to secure even the minimal public land on that site that we were told it would when the Waterford Bay project was being planned. (A site that should have been an inviting neighborhood river access point is now a privately owned kayak launch to which the property managers have at times refused the promised public access.)

Now, the neighborhood is being asked to give up on yet another documented opportunity for a less industrialized river area. The city's failure to account for these established community plans is disappointing, and disrespects the hundreds of hours residents spent developing these plans.

Proposed use not similar to permitted uses

We also disagree with the city's finding that the proposed use is similar to a public works yard, which would be a permitted use in this district.

A public works facility is designated and scaled to serve a defined geography for the public's benefit. Public works yards are sited through transparent and accountable public processes. FCC, in contrast, is a private multinational corporation. A corporation's primary purpose is profit, not public benefit. Its business decisions do not allow for public input via a transparent and accountable process. And FCC has been very open that this property would not serve only St. Paul, but an undefined regionwide geography that could result in more than doubling the fleet size needed to serve St. Paul alone.

For all of these reasons, FCC should not be given the same level of consideration that a public facility would, because it doesn't provide the same level of public benefits in exchange.

I urge you to grant the Appeal of Determination of Similar Use by finding that the proposed use is not consistent with the Comprehensive Plan.

Thank you for your consideration.

For the river,

Colleen O'Connor Toberman
Land Use & Planning Director