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To: [#CI-StPaul_Ward4](#); [#CI-StPaul_Ward1](#)
Cc: [*CI-StPaul_Contact-Council](#); [David Reiling](#); [Melvin Carter](#)
Subject: Drive Throughs Zoning Study
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Council President Jalali and Council Member Bowie- greetings from Sunrise Banks. Thank you for your all your hard work every day in helping make our great city even better. I'm copying owner and President David Reiling and will be meeting with him later this month to get any further observations he might have on the above issue. We were just made aware of it last week and wanted to provide immediate feedback as the matter appears to be moving along quickly for a vote.

As you know, Sunrise Banks is locally owned and is the United States Treasury's only designated community development bank in Minnesota. We are centered here in Saint Paul with over 200 diverse, full-time, and living wage employed people working throughout our three Saint Paul locations. The properties include our corporate building at 2525 Wabash in the West Midway (no drive-through presently and ineligible under the proposed amendments), a commercial and consumer hub at 2300 Como in Saint Anthony Park (with drive-through and now considered a legal non-conforming use) and a community bank center and neighborhood office building at 200 University Avenue in Frogtown (with drive-through and it too would be considered a legal non-conforming use status but for the fact that its location is governed by the State Capitol Planning Board). The Reiling family has owned the bank and these facilities for decades and has taken great pride in continually improving the quality of the real estate as well as the provision of fair and affordable financial products and services to the underserved communities you represent.

Our major reaction is that the city should focus on fast-food and coffee shop drive-throughs and eliminate banks and other life safety businesses from additional restrictions. Financial institution drive-throughs have completely different traffic levels and trends. The dynamics and use of bank drive-throughs have changed dramatically over the past decades, to a point where they represent neither a traffic hazard nor a land-use conflict. The use of drive-through lanes is 10% from fifty years ago and is likely to continue to decrease as digital banking replaces place-based visits. Today, our drive-throughs primarily accommodate seniors, the handicapped and small retailers. There are no banks in Saint Paul, that we're aware of, that have traffic queuing onto public streets-at Sunrise we have just one or two cars in each lane at any given time. It certainly is a far-cry from a generation ago with two dozen cars trying to make their way toward teller windows to cash Friday afternoon payroll checks. The number of banks and branches have shrunk in Saint Paul, and there is an unintended message when one's property is designated after the fact as "a legal non-conforming use", notwithstanding that the business was permissible when constructed, that the properties have experienced strong reinvestment and that there have been very few or no complaints from customers and neighbors. Typically, a non-conforming use should be accompanied by a recognized and significant land-use conflict. Bank drive-throughs, both existing and proposed, do not rise to that threshold today.

While we understand banks may continue to use facilities under the grandfathering clause, it sends a chilling effect and, of course, instantly devalues the property in the eyes of the marketplace. It may also discourage short and intermediate investment if the ultimate disposition is being steered by the city to a redevelopment outcome. Also, prohibiting new construction of bank facilities with drive-throughs that are too closely located to transit

stations or whose heights lacks four stories or that are located downtown, strikes us a megacity solution that does not fit the medium density and very modest mass transit utilization levels of Saint Paul. Further, the city's zoning administrator already has the authority to review and adjust site plan applications based on best practices and individual situations, and certainly the citizen participation process ensures that community groups have strong influence on construction design and plans.

Aside from linking low-volume bank facilities with intense food and beverage drive-ups, our MAJOR operational concern with the recommendations is the requirement to force drive-through hours to coincide with those inside the building. For our bank, small retailers need early access to cash and coin as they begin their business day. Many proprietors store currency overnight and retrieve it in the morning-they are uncomfortable walking in and out of the car with bags of cash. They're targets for robbery, of course, and are too small to utilize armored car services. Early drive-through service provides them privacy, security, and efficiency. For other bank customers, there is no demand for earlier hours. For the occasional need, we will special arrangements to meet with customers before business hours. We would need to staff at least two additional in-building people daily at each branch during this gap period to safely handle this unnecessary burden for which there is no demand. We are already struggling to fill open positions in this tight local labor market. Finally, we are open on Saturdays to handle residents who cannot otherwise visit the branch during the work week.

Please be careful in not broad brushing all businesses with drive-throughs. Financial institutions provide extremely sensitive lifeline products and services. The city should be doing everything it can to encourage banks to keep their remaining "brick and mortar" facilities open. They're a critical access resources and are symbols of progress and hope for our urban neighborhoods. Thanks in advance for considering our comments.

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Sunrise Banks made the following annotations:

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