



November 6th, 2024

Bill Dermody, Principal City Planner, Planning Commission

This letter is on behalf of the Union Park District Council, regarding the Saint Paul Planning Commission proposed amendments to zoning laws around the construction and modification of drive-through businesses in the City of Saint Paul.

The Union Park District Council is in favor of the proposed amendments, as we feel that it fairly balances the need and desire for drive-through commerce while also setting reasonable rules to minimize their impact on lives of pedestrians and other non-vehicular traffic.

However, there is concern amongst the board around the growing development of “drive-through only” businesses around the Twin Cities. These businesses are intentionally unfriendly to pedestrians, bicyclists, and transit users, and their operation runs counter to the city’s established climate goals in the 2040 Comprehensive Plan.

As such, we recommend that the Planning Commission consider the following change to the proposed amendment:

Sec. 65.513. - Drive-through sales and services, principal and accessory.

Standards and conditions:

(g) Service must be provided either via interior access or via walk-up service window throughout the same hours as customers are served by drive-through lanes.

Language such as this would provide equitable access to business services by customers using all forms of transportation modalities.

Thank you,

Sarah Dvorak Board President



November 6, 2024

Honorable Mayor Carter  
Honorable Members of the Saint Paul City Council  
390 City Hall  
15 Kellogg Boulevard West  
St. Paul, MN 55102

Honorable Mayor Carter, Honorable Members of the Saint Paul City Council, Staff,

The City of Saint Paul's Business Review Council respectfully submits this letter to advise of concerns with and request a layover of the first reading of the current drive-through zoning proposal. The BRC has the following concerns with the zoning proposal in its current language:

- The current proposal will put Saint Paul businesses at a competitive disadvantage and will discourage new businesses to the City with the addition of this burdensome regulation to drive-thru operations. Many food businesses with drive-throughs have up to 60% of their revenue from this service.
- This will negatively impact consumers who desire more drive-thru services at pharmacies, banks, and food/beverage establishments, especially those who may be disabled or otherwise unable to easily exit their vehicles if they are caring for others in the vehicle.
- The close 7-5 vote of the Planning Commission highlights a need for further study and refinement. The lack of clarity exists in two areas:
  - Defining the problem the proposal is meant to solve based on information received thus far from presentations and materials provided to the BRC.
  - The level of engagement from the business community, especially current City of Saint Paul Drive-Through business owners, in the planning and drafting of proposed changes.

If you choose to layover this proposed zoning change, we will welcome further engagement and discussion to refine a solution. Thank you for your consideration of this request and concerns.

Sincerely,

R Lynn Pingol, Chair  
Business Review Council