

From: [Diane Gerth](#)
To: [*CI-StPaul_Contact-Council](#); [#CI-StPaul_Ward1](#); [#CI-StPaul_Ward2](#); [#CI-StPaul_Ward6](#); [#CI-StPaul_Ward5](#); [#CI-StPaul_Ward4](#); [#CI-StPaul_Ward7](#); [#CI-StPaul_Ward3](#)
Cc: [Julia McColley](#)
Subject: Testimony for Fort Road Federation Zoning Appeal FCC Fueling Station
Date: Tuesday, March 18, 2025 10:46:31 AM

Testimony of Diane Gerth
Saint Paul City Council March 19, 2025
Matter APC-25-2

President Noecker and Members of the Council:

My name is Diane Gerth and I am a long time resident of the West Seventh Neighborhood. I am a former chair of the West Seventh Federation, a member of the board at Keystone Community Center and the Community Reporter. I have served as the chair of the City's Capital Improvement Budget Committee and have served on many of the working groups and committees that drafted the various City-required planning documents that have been part of this appeal.

I'm a lawyer by trade, and my focus here is the procedures used by the Planning Commission and to raise the issue of due process. I want to call your attention to the flawed process that resulted in the recommendations you are reviewing today – the determination of zoning code compliance. I will leave it to others to address the merits of the appeal; I will focus on the dangers of making decisions without considering the voices of the people who deserve to be heard.

Due process is the right of a person to receive notice of what is proposed to be done by government agencies and the opportunity to be heard on those proposed actions. The Federation and a number of concerned members of the public were denied due process when the planning Commission made its recommendation to this body. As you no doubt know, the comments and materials from the District Council – a creature of City creation – and over a dozen commenters were simply not provided to the Commissioners before they made their decision. For whatever reason, the Planning Commission did not have the comments of important stakeholders, and its determination cannot stand.

Like most government decision makers, the Commission relies on their staff to ensure that they have the full information that would give them the opportunity to take a hard look at the evidence. The Commission did not have the full record before it. Nineteen pieces of evidence were simply left out of the materials they needed. Because of the incomplete record before the Planning Commission, their decision and the weight it carries is flawed.

When a government decision has made decisions based on an incomplete record, the response cannot be a "no harm, no foul" approach. Courts have frequently held that when a government decision fails to consider the full record, the remedy is to return the decision to that body to proceed correctly.

We know this from the 2023 case from the Minnesota Supreme Court regarding the issuance of a permit by the Minnesota Pollution Control Agency for PolyMet Mining in northern Minnesota, *Matter of Denial of Contested Case Hearing Requests*, 993 N.W.2d 267 (Minn. 2023). In that matter, the MPCA issued a permit relating to pollution by the mining project without complete information. MPCA was missing crucial information critical of the project from the federal Environmental Protection Agency. In making its decision in granting the permit, MPCA staff had not provided the comments of the EPA. This resulted in the granting of a permit where opposing facts and viewpoints were kept from the decision maker. In the litigation that followed, the Minnesota Supreme Court held that the MPCA did not engage in reasoned decision making, and essentially told the MPCA to go back and do its job correctly and to consider the missing information.

That is what should happen here. The Planning Commission did not receive crucial information and facts critical of the project at 560 Randolph. They did not have before them all the information they needed to make a fully informed decision. The written comments of one of the most important

players – the District Council – was not included in the information provided to the Commission. Missing information resulted in a flawed process and an illegally issued permit.

Saint Paul's City Code §107.02 (f) requires that the Planning Commission "shall conduct its business in such a manner as to encourage and utilize maximum citizen participation." This procedural irregularity resulted in a decision that is based on a incomplete information and must be considered arbitrary and capricious.

This matter needs to go back to the Planning Commission to get it right.

Respectfully submitted,

Diane Gerth

From: [Naomi Blinick](#)
To: [*CI-StPaul_Contact-Council](#)
Cc: [Julia McColley](#); [#CI-StPaul_Ward1](#); [#CI-StPaul_Ward2](#); [#CI-StPaul_Ward3](#); [#CI-StPaul_Ward4](#); [#CI-StPaul_Ward5](#); [#CI-StPaul_Ward6](#); [#CI-StPaul_Ward7](#); [Meg Duhr](#)
Subject: Appeal #25-015636: Determination of Similar Use for Proposed Trash Truck Site at 560 Randolph Ave.
Date: Tuesday, March 18, 2025 9:45:40 AM
Attachments: [NBlinick Public Testimony – Appeal of Determination of Similar Use for Proposed Trash Truck Site at 560 Randolph Ave.pdf](#)

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Public Testimony – Appeal of Determination of Similar Use for Proposed Trash Truck Site at 560 Randolph Ave.

Appeal #25-015636

Dear Saint Paul City Council Members,

I strongly urge you to reverse the Planning Commission's denial of the Fort Road Federation's appeal to the determination of similar use for the proposed trash truck site at 560 Randolph Ave. This determination is fundamentally flawed and overlooks critical differences between the proposed use and typical public works operations.

Key Concerns

1.

Traffic and Safety Issues: The streets surrounding the site are ill-equipped to handle the increased heavy truck traffic, posing significant safety risks to pedestrians, cyclists, and local drivers. This site serves as the sole access point to the Mississippi River for our neighborhood, which will further disconnect us from the river, conflicting with multiple city plans aimed at riverfront revitalization.

2.

Environmental and Health Concerns: The emissions from idling trucks and potential leaks from the compressed natural gas (CNG) fueling station present serious environmental and health risks to the community, for the benefit of a private company, setting it apart from a typical public works facility.

Distinct Differences from Typical Public Works Operations

The Planning Commission's decision fails to recognize the fundamental differences between this proposed use and a typical public works yard:

1.

Scale and Intensity: This site would start with a fleet of 30+ large trash trucks, with peak traffic during rush hour commute times. FCC Environmental has been

open about their plans to increase site capacity up to 80 trash trucks, greatly increasing this impact. This far exceeds the scale and intensity of typical public works operations.

2.

Compressed Natural Gas (CNG) Fueling Station: The inclusion of a CNG fueling station introduces unique and significant risks:

- **Explosion Risk:** CNG is highly combustible, and a leak or equipment failure could lead to a catastrophic explosion, especially concerning given the potential proximity to public trails, the Mississippi River, and nearby commercial and housing developments.
- **Specialized Safety Protocols:** CNG fueling requires stringent safety measures and specialized training, far beyond what's needed for typical diesel or gasoline fueling.
- **Environmental Hazards:** While CNG is often touted as cleaner than diesel, leaks of methane (the primary component of CNG) are a potent greenhouse gas, contributing significantly to climate change.

3.

Use and Impact Exceeding Community Needs: As a private enterprise, FCC Environmental has plans for future contracts and service expansions to other municipalities. This means greater impacts from truck traffic, noise, and increased pollution potential, with our neighborhood bearing the costs for a private company's commercial revenue, not just serving our direct community.

Procedural Concerns

The process leading to this determination has been marred by procedural issues:

1.

Zoning Inconsistencies: The current zoning for light industrial use conflicts with decades of city planning aimed at mixed-use development and riverfront revitalization. The site's designation in the 2040 Comprehensive Plan and the Great River Passage Plan highlights its potential for residential and commercial growth, not industrial expansion. Even if rezoning were possible in the future, the construction of an expensive CNG fueling station would entrench this site's use for many years, potentially decades, depriving the community of its desired

development path.

2.

Repeated Failures in Community Engagement: Despite community concerns and appeals, the Planning Commission apparently did not receive much of the submitted public testimony to the zoning committee. This lack of access to pertinent information undermines their ability to make an informed decision. At the planning commission meeting, a commissioner's question about community conflict with the planned development revealed a remarkable lack of understanding of the appeal's basis. Their decision disregards years of public input and community vision for the area, eroding trust and engagement essential for effective urban planning.

Emissions Impact

The proposed facility would emit significant pollutants despite the claims of being clean energy. Natural gas is a fossil fuel. According to estimates based on the site plan, potential emissions could be:

- Methane (CH₄): 100–120 lb/day, equivalent to the emissions of 300–400 gasoline cars.
- Nitrogen Oxides (NO_x): 3.5–8.4 lb/day, comparable to the emissions of 20–50 diesel trucks.
- Carbon Monoxide (CO): 7–17.5 lb/day, similar to the emissions of 15–35 gasoline cars.

These emissions pose serious environmental and health risks, particularly in dense urban areas where NO_x and CO levels could exceed air quality thresholds.

Community Impact

The presence of a trash truck facility could impede economic development in the surrounding area, contradicting long-standing community plans for mixed-use development and riverfront revitalization. This decision could stifle growth around key attractions like the Keg and Case Market, which is clearly in need of more people-traffic, not truck-traffic.

In conclusion, the proposed trash truck site, with its CNG fueling station, represents a use that is fundamentally different and far more impactful than typical public works operations. The potential risks to public safety, environmental health, and community well-being are too great to ignore. Furthermore, the procedural issues and disregard for community planning highlight the need for a more transparent and inclusive decision-making process. Our community's trust in city government and processes has been greatly damaged in the past few months by the seemingly purposeful neglect of our needs, interests, and decades of hard work in planning. I implore the City Council to recognize these crucial distinctions and overturn the Planning Commission's determination of similar use.

Thank you for your consideration of this critical matter.

Naomi Blinick
223 Colborne St.
St. Paul, MN 55102

From: [Naomi Austin](#)
To: [*CI-StPaul_Contact-Council](#)
Cc: [julia@fortroadfederation.org](#); [#CI-StPaul_Ward1](#); [#CI-StPaul_Ward2](#); [#CI-StPaul_Ward3](#); [#CI-StPaul_Ward4](#); [#CI-StPaul_Ward5](#); [#CI-StPaul_Ward7](#); [#CI-StPaul_Ward6](#)
Subject: Appeal # 25-015636
Date: Monday, March 17, 2025 11:54:28 PM

Some people who received this message don't often get email from austinegnauer@gmail.com. [Learn why this is important](#)

Saint Paul City Council,

My name is Naomi Austin. I live at 90 Garfield Street in the Little Bohemia neighborhood of West 7th Street.

As a resident of this neighborhood for the past seventeen years, I implore you to accept the Federation's appeal against the Planning Commission's recommendation of "similar use," which allows the industrial trash truck facility to be at 560 Randolph Avenue.

I attended the Zoning Committee meeting on Thursday, February 13th. Equating a privatized, multinational corporation with the City- run facility on Dale Street, is completely erroneous, and clearly not "similar use." The Dale Street facility sits in a large industrial site, near a railway transfer station, a cemetery, and Pierce Butler Route, a road used mostly for commuters and trucking. This is not in any way "similar" to West 7th Street, the fairly narrow, 150 year old main street of our residential neighborhood, which is full of homes, small businesses, and a great deal of pedestrian traffic.

The expectations of the West 7th community were that this site eventually would be developed in a manner that would support community needs, including mixed use housing and local businesses. It was also to greatly improve river access to the adjoining neighborhoods, which has been denied since the construction of Sheppard Road.

A determination of "similar use" is a betrayal of the West 7th community, and further weakens trust in local government. At the initial community meeting with FCC, we were told this site at 560 Randolph was the only available commercial site on the market, only to learn later it was an off-market sale. The exclusion of key documents from the community and the Federation and the inaccuracies included in documents to the Planning Commission also lead to distrust. The complete disregard of the Great River Passage Plan, the Mississippi Corridor Plan and the City's Comprehensive Plan leads one to conclude that the City simply doesn't care.

What West 7th Street needs is what was promised - housing, river access, and a vibrant commercial corridor, not a multinational, privately owned garbage facility with a great view of the river.

Sincerely,
Naomi Austin
90 Garfield Street, 55102

P.S. Going to work last week, a garbage truck in each lane on 7th, a vision of our foreseeable future.



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506-24-1600

From: [Kayla Thao](#)
To: [Greg Weiner](#)
Subject: FW: APPEAL 25-15636
Date: Tuesday, March 18, 2025 3:26:43 PM

Hi Greg,

Can you please add this one to the public comments section (if it's not already on there)?

Thank you,

Kayla

From: delores barton <dktbarton@gmail.com>
Sent: Monday, March 17, 2025 1:46 PM
To: #CI-StPaul_Ward2 <Ward2@ci.stpaul.mn.us>
Subject: APPEAL 25-15636

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Think Before You Click: This email originated **outside** our organization.

As a longtime resident of the brewery neighborhood, I have witnessed the assault by the government on our neighborhood. For example, the government downsized our neighborhood by adding a freeway to help suburbanites. The government built an overpass nearby that closed stores and cut the neighborhood off because a few trains traveled across West Seventh every day. For years, we were inundated by halfway houses for mentally ill persons and criminals that made some children afraid to even wait for the school bus because some of them were harassed. The government allowed an ethanol plant with at least two ammonia leaks and other pollutants that made residents sick. Further down West 7th a day shelter was approved that made it scary to walk past. The government wanted to bring light rail here and further cut off the neighborhood. Even North Minneapolis didn't want it there because of the increase in crime it brings. Now our government, which should be here to protect us but seems to often ignore the wishes of the people, is willing to put a trash fueling station near where I live rather than allow housing, which is badly needed. We have had more than our share of assault by the government and don't need any more environmental hazards. All to accommodate the latest trash collection company, which may turn out to be a dud, as many large haulers are. and then will probably leave an environmental mess behind. for taxpayers to clean up.

Delores Barton

380 Erie St.
55102

From: [John Yust](#)
To: [#CI-StPaul_Ward1](#); [#CI-StPaul_Ward2](#); [#CI-StPaul_Ward3](#); [#CI-StPaul_Ward4](#); [#CI-StPaul_Ward5](#); [#CI-StPaul_Ward6](#); [#CI-StPaul_Ward7](#); [*CI-StPaul_Contact-Council](#)
Cc: [Julia McColley](#); [Meg Duhr](#)
Subject: City Council Hearing on appeal #25-015636
Date: Tuesday, March 18, 2025 2:43:48 PM
Attachments: [CC Hearing. Appeal.pdf](#)

March 18, 2025

To: Saint Paul City Councilmembers

Re: Fort Road Federation Appeal of Determination of Similar Use for 560 Randolph Avenue #25-015636

My name is John Yust, and I am a past president of the West Seventh Street Federation. I was Councilman David Thune's representative for the Great River Passage Plan. My colleague, Kent Peterson, and I spent countless hours helping formulate the plan that was adopted in 2011.

The Great River Passage Master Plan clearly illustrates the aspiration for housing and community connections to the river through its guiding principles:

- * To be more natural
- * To be more urban
- * To be more connected

The community's long-term goal has been to create this critical connection between the Mississippi River and the community along Randolph Avenue. Continued and expanded industrial use is inconsistent with this goal and our plans, including the Great River Passage Plan, which have not supported industrial use. The zoning determination that the FCC CNG refueling station is simply a maintenance facility is not correct.

The West Seventh Street community suffered when Interstate 35-E bulldozed our neighborhoods, and we lost population that weakened our churches, schools, and businesses. Forty years later, millions of dollars were invested in the Schmidt Brewery Artist Lofts for housing and Keg and Case. Covid decimated Keg and Case, and its future will be undermined without creating additional housing for people, on the site where FCC wants to locate. Long before Covid, the community recognized the potential for this site to be housing and mixed use, not industrial.

The Departments of Zoning, Planning and Economic Development, and Public Works have misrepresented the 2040 Comprehensive Plan, basing their research on one map and not the text and appendices of the plan.

We tried to work with Planning and Economic Development, Public Works, and the Port Authority to collaborate with FCC and the Federation to find a more appropriate site in the city for a land swap before major dollars are invested in the Randolph site. No City staff leaders came to the table to work on this compromise—failing the respect and trust we thought we had with the City.

FCC at 560 Randolph is a colossal boondoggle. It would be unfortunate if this project is forced down our throats, leaving FCC to enter Saint Paul under a long-term dark cloud. Please support our appeal.

From: [Kelsey Peterson](#)
To: [*CI-StPaul_Contact-Council](#)
Cc: [#CI-StPaul_Ward1](#); [#CI-StPaul_Ward2](#); [#CI-StPaul_Ward3](#); [#CI-StPaul_Ward4](#); [#CI-StPaul_Ward5](#); [#CI-StPaul_Ward6](#); [#CI-StPaul_Ward7](#)
Subject: Written Testimony for Appeal #25-015636
Date: Tuesday, March 18, 2025 2:17:28 PM

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Appeal #25-015636

Hello Council Members,

I am writing to you today to express my deep opposition to the FCC facility in the West 7th neighborhood and to support the Fort Road Federation's appeal of the Determination of Similar use. While West 7th itself is a small community, we are enclosed on all sides and bisected down the middle by highways—a legacy of city and regional planners prioritizing suburban commuters and quick access to the airport from wealthier St. Paul neighborhoods over the health, safety, and vitality of our community. Construction of Shepard put what is essentially a freeway between us and the river. To build 35E in the early 70s, MnDOT removed one-third of our community's housing stock. And in those homes, we lost neighbors. It decimated our school, churches, and businesses. The ongoing impacts of this freeway include high speed drivers treating our neighborhoods as on-ramps, as well as noise and air pollution.

In the early 2000s our neighborhood was home to the only urban ethanol plant in the country, Gopher State Ethanol, which operated at the former Schmidt Brewery site. Residents suffered from air and noise pollution, as well as noxious odors during its operation. We still have Xcel Energy's High Bridge plant in the neighborhood. This was a coal-fired plant from 1923 to 2008. Though it's run on cleaner burning natural gas now, air quality concerns associated with natural gas pipelines and gas combustion remain.

We have hopeful stories, too, thanks to the organizing of the Fort Road Federation and our past partnerships with the HRA and the city. Deeply contaminated land used by Exxon-Mobil to store fuel and oil in above ground tanks was cleaned up and the site now supports housing, a school, and a park. The condos, apartments, and riverfront walk at Upper Landing sit on what used to be an industrial scale metal scrap yard. The site proposed for FCC to dispatch and refuel their fleet of 36-80 garbage trucks could serve the city and community, too. That's why there are decades of city and neighborhood planning documents that support a vision of mixed-use development and green connections to the river for this site. And it's why there are over a dozen 2040 Comp Plan policies that are in direct contrast to placing an industrial trash truck facility at this location: part of the

Randolph/West 7th neighborhood node and ear-marked for transit oriented development.

West 7th has paid its dues. Our community is already deeply and disproportionately impacted by urban highways, industrial uses, and vehicle traffic. If you count both the FCC staff and the trash truck trips themselves, we will be dealing with a minimum of 150 vehicle and heavy truck trips per day coming and going from this site in the central core of our community, plus a compressed natural gas fueling station. If Mayor Carter and his Department Directors truly wanted to advance “an unapologetic equity agenda” an industrial scale trash truck facility would NEVER be considered in our neighborhood.

Thank you for your time.

Kelsey Jean Peterson
900 W 7th St. Apt 517
Saint Paul MN 55102

From: [Fran Zamb](#)
To: [Julia McColley](#); [#CI-StPaul_Council](#)
Cc: [#CI-StPaul_Ward1](#); [#CI-StPaul_Ward2](#); [#CI-StPaul_Ward3](#); [#CI-StPaul_Ward4](#); [#CI-StPaul_Ward5](#); [#CI-StPaul_Ward6](#); [#CI-StPaul_Ward7](#)
Subject: Appeal #25015636
Date: Tuesday, March 18, 2025 2:17:27 PM

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Think Before You Click: This email originated **outside** our organization.

Fran Zamb, 806 James Avenue

I have a hefty list of objections to the proposed fueling facility, parking lot for 30-80 garbage trucks, and the structure to be built at the corner of Randolph Avenue and Shepard Road, 55102.

Few constituents, homeowners, business owners are aware that "FCC" is in fact, headquartered in SPAIN! Spain, Spain, Not Spain Mn., or Spain Illinois, or any other of the 50 United States of America. Not even Spain Mexico or Canada! FCC--according to google, does have its US offices in Houston---Houston Texas, not Houston Mn.

Once thought of as the evil Carting conglomeration, what happened to Waste Management---the company hand-picked in the last go-round for city residential garbage services? Were they not interested in extending their relationship? Details please. (I was a Berquist customer paying \$89 and with WM, I am currently at \$139) Who were the other contract bidders? Were there any?

What's the true value of the total contract? What is FCC giving us, what are we giving them--loans, tax incentives, environmental allowances, etc.? I saw mention of "new trucks" at a cost of 4 million? Who's paying for the trucks? Who owns the trucks? What happens to the WM trucks that currently work our alleys? What happened to the worldwide mantra "Reduce, Reuse, Recycle" ?

Here's a novel suggestion, what about partnering with our own Twin city's carting services? AKA, Minneapolis. Or, at least considering their operation? How do they do it without crossing the Atlantic?

Moving on, take a walk down Randolph, a half block from the proposed garbage gas station and truck stop, is the City of St. Paul's premier, Firehouse Station, Number 1! Across from that is a community health clinic, "down the road" is the

sprawling Nova Academy, Shalom Home, senior health care and a Betty Ford and Hazelden administration and services campus... I ask representatives from all of these, and more not mentioned, to join our West 7th effort to stop the City and FCC and all the parties in this damming use of the Randolph-Shepard location.

On this map, are pockets of St. Paul that have withstood previous insults of environmental miscarriage--oil tanks, industrial and chemical locations. For years, residents battled commercial and political interests, while suffering health concerns, quality of life issues, and diminishing property values. Once again, our neighborhood has been targeted without consideration.

With regard to the street, the road itself is not "straight", the surface deteriorating, bouncing over old rr tracks, and carries unpredictable traffic, some entering at high speeds from Shepard Road, others racing to get to Shepard Road to speed downtown or the airport...

There's nothing right with this proposition. This land should present our community with a viable and modern recreation/community/services center, or a library that is larger than a public restroom, a green space to invite walkers and bicyclists to access and honor the great Mississippi River in our backyard!

We need dreamers and doers--not foreign investors interested in claiming a foothold in the US upper midwest.

Talk to the people who live here, and listen.

With sincere affection for the people and places of West 7th,

Frani Zamb

From: [Sara Fleetham](#)
To: [*CI-StPaul_Contact-Council](#)
Cc: [#CI-StPaul_Ward1](#); [#CI-StPaul_Ward2](#); [#CI-StPaul_Ward3](#); [#CI-StPaul_Ward4](#); [#CI-StPaul_Ward5](#); [#CI-StPaul_Ward6](#); [#CI-StPaul_Ward7](#); [Julia McColley](#)
Subject: FCC Refueling Station City Council Matter: APC 25-2
Date: Tuesday, March 18, 2025 12:20:17 PM

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City Council, 3/19/2025

Matter: APC 25-2

Considering the appeal of West 7th/Fort Road Federation to a decision of the Planning Commission denying an appeal of a Statement of Clarification issued by the Zoning Administrator that a proposed solid waste truck dispatch center and maintenance facility is similar to a public works yard or maintenance facility at 560 Randolph Avenue.

I ask the City Council to grant this appeal of Planning Commission decision.

This project is not an example of similar use and traffic. The traffic will not be similar. There will be a drastic increase on scale and impact with additional noise and congestion. Most importantly the excessive wear and tear on a decades long neglected roadway is not suitable for the neighborhood.

I was a part of the Citizens Advisory Committee for the Great River Passage plan for the Mississippi River Learning Center and this project does not fit within the Great River Passage Plan, the Mississippi Corridor Plan, FRF Development plan and many aspects of the Comprehensive City Plan. This project is in direct opposition to these plans. Randolph Avenue is one of only 3 access points in my neighborhood to the river. This project creates additional barriers to the river and makes this access point less safe.

It is not similar. We need to keep working the plans. As a city we have been doing better with access to affordable housing and creating more housing as referenced in a Minnpost article from 2/13/2025 morning on <https://www.minnpost.com/community-voices/2025/02/st-paul-can-hang-its-hat-on-some-recent-development-successes/>.

Please grant this appeal. It is vitally Important for the river, access to the river, and my neighborhood's livability that FCC not use this land parcel as a truck storage and refueling station.

Sara Fleetham

953 Scheffer Ave

Saint Paul, MN 55102

From: [Meg Duhr](#)
To: [*CI-StPaul_Contact-Council](#)
Cc: [Julia McColley](#); [#CI-StPaul_Ward1](#); [#CI-StPaul_Ward2](#); [#CI-StPaul_Ward3](#); [#CI-StPaul_Ward4](#); [#CI-StPaul_Ward5](#); [#CI-StPaul_Ward6](#); [#CI-StPaul_Ward7](#)
Subject: Written testimony regarding appeal #25-015636
Date: Tuesday, March 18, 2025 11:54:52 AM

Some people who received this message don't often get email from megduhr@gmail.com. [Learn why this is important](#)

Written testimony of Meg Duhr, 223 Colborne Street, regarding appeal #25-015636 (Determination of similar use for proposed FCC industrial trash truck dispatching facility)

Hello Council Members,

I am writing this morning to share my personal opposition to the Planning Commission's decision that a privately owned, industrial-scale trash truck dispatching facility fits the intent of the I1 Light Industrial zoning district and is similar in scale and intensity to a municipal public works yard. If you have read the Fort Road Federation's appeal to the City Council you are already familiar with my arguments from the perspective of zoning compliance and Comprehensive Planning. I currently serve as the Board President of the Fort Road Federation and I wrote that appeal with our organization's sole staff person, Julia McColley. We wrote that appeal over several evenings and most of a weekend. With our tiny District Council budget, we cannot afford an attorney.

I work a full-time job with a long commute in order to continue to afford living in St. Paul. I am deeply committed to this city, especially my community here in West 7th, and since joining the Federation in 2022, much of my free time goes toward serving this organization. I wish I could focus more energy on positive projects, such as updating our district plan or recruiting neighbors to help with managing new community gardens, but since last December, most of my free time has been spent fighting an industrial trash truck facility in the heart of our community and along one of our neighborhood's only access points to the river that isn't blocked by train tracks and Shepard Highway.

In the last three months, I've attended four meetings with city staff, two public hearings, and held nine different meetings with community members and local partners. The issue, in its complexity, scope, and impact, has also dominated our monthly board meetings. I want to speak personally here and say that as a resident,

taxpayer, and community leader, it makes me extremely sad and quite angry that city staff in multiple departments, including the Deputy Mayor's office, are basically working against our neighborhood and decades of established citywide plans in their push to locate an industrial trash truck facility at 560 Randolph. While I have to use vacation time to attend hearings and meetings, and spend my evenings researching the details of zoning code and scouring the contents of meeting packets for mistakes and misinformation, city staff continue to flaunt basic procedural rules and work against established city plans.

In conversations with these staff and in their presentations to the Planning Commission, they will often describe the plans for this site and its surrounding parcel as "the community vision" or "neighborhood plans." This is said in an attempt to minimize opposition as more of a localized "NIMBY" issue and downplay the wealth of established and active citywide planning documents that clearly outline a very different trajectory for this land than parking and refueling operations for 36-80 trash trucks. In the staff report to the Planning Commission a chart was included that made it look like the Great River Passage Plan and the Mississippi River Corridor Plan (which are formal addenda to the 2040 Comprehensive Plan) were "decertified." And of course, this document was included in the same meeting packet that omitted 19 items of written community testimony and the Federation's testimony to the Zoning Committee. Attending the Planning Commission meeting, where we were not allowed to speak but observing even more disinformation and distortions being spoon fed to Planning Commissioners while our information was missing was extremely frustrating.

The missteps and the violations of community trust go back much further than this. In a way, this began years ago when the two river plans and our small area plans were finalized and signed by the city council, but the land was never rezoned appropriately. A more recent mistake came when Pubic Work issued its request for proposals for the citywide trash collection contract, which emphasized a preference for the new hauler to be located in St. Paul, but did not include any restrictions on where the site could be located. If comprehensive planning and social equity had been factored into this process, the 560 Randolph site would never have been on the table. While I understand why the city wants its new hauler to be in the city and supporting the tax base, this particular site is a massively wasted opportunity, purely from the perspective of property taxes. If the site was developed into multi-family housing, commercial uses, and other transit-oriented development at this important Neighborhood Node, the property tax revenue would be dramatically greater. Instead,

the city wants to sacrifice this parcel, with its million-dollar views of the river valley, the High Bridge, and the St. Paul skyline, for garbage truck parking.

It has often felt like the community has been deliberately left out of this process. Starting in early June of 2024, Fort Road Federation leaders first heard rumours about a new site for FCC on Randolph Avenue near the river. Shortly after, we began asking questions and voicing concerns about this project to the city. In a follow-up message, we were referred to FCC staff and leadership, based on the notion that Public Works did not have details about site operations or ability to address concerns, since it was all being handled by FCC. We attempted to meet with FCC staff multiple times in the summer and fall of 2024, but our requests were deflected or ignored.

On December 4th, 2024 the Federation hosted its monthly Transportation and Land Use Committee meeting, with the new trash truck facility on the agenda. This was the first time FCC met with the Federation and the community. At that point in time, we were told the site had been purchased and they were moving forward with next steps. Public works staff repeatedly deflected any responsibility in this failure to observe decades of city planning, as well as policies that direct staff to consider city planning in expenditures of city funds, noting that this was a private sale between two parties.

As the situation escalated over the winter and in continued meetings with city staff and department leaders, it became increasingly clear that broader city industrial needs were taking precedence over city-adopted plans, the long-term vision for river-oriented development, and even the public process. As we described the myriad existing, approved, and active plans, as well as 2040 Comp Plan policies that supported a vision of mixed use and transit-oriented development at this location, city staff continued to fall back on one appendix of the Comp Plan to support their entire argument, the 'Future Land Use Map.' This single map codes the 560 Randolph parcel and other sites to the immediate southeast as I1 Light Industrial. When we pointed out five other maps that also show the site and describe its relationship to Comp Plan policies such as Neighborhood Nodes, the Grand Round Scenic Byway, or planned and potential transit ways, our comments were simply ignored. In all the city-prepared reports and presentations to the Planning Commission, they rarely, if ever, mention these other policies and plans. Their entire argument rests on one map.

The Comp Plan is in conflict with itself, but the wealth of policies and other specific visions are on our side. No reasonable interpretation of its policies could

support an industrial trash truck facility at this site. Please do not let a mapping error lead to this substantial burden on our community and a tremendous waste of potential for this site. St. Paul needs more housing and residents want more river-oriented amenities, not further industrial entrenchment along the river. Furthermore, approving the Planning Commission's decision sends the message that suppressing testimony and ignoring plans written in partnership with communities is tolerated.

I am so grateful that we have the opportunity to appeal our case to this elected body and I thank you for your time and consideration.

Sincerely,
Meg Duhr

From: [Kathleen Corley](#)
To: [*CI-StPaul_Contact-Council](#)
Cc: [Julia McColley](#); [#CI-StPaul_Ward1](#); [#CI-StPaul_Ward2](#); [#CI-StPaul_Ward3](#); [#CI-StPaul_Ward4](#); [#CI-StPaul_Ward5](#); [#CI-StPaul_Ward6](#); [#CI-StPaul_Ward7](#)
Subject: City Council Appeal: Determination of Similar Use for 560 Randolph Avenue – #24-102442
Date: Tuesday, March 18, 2025 11:45:46 AM
Attachments: [City Council letter.pdf](#)

Some people who received this message don't often get email from khcorley0311@gmail.com. [Learn why this is important](#)

To Whom It May Concern:

Attached please find written testimony in the case before the City Council at tomorrow's meeting.

Kind regards,
Kathleen Corley

Kathleen H. Corley
651.295.1825

Please note:

Effective immediately my new and only email address is
khcorley0311@gmail.com

KATHLEEN H CORLEY

248 Goodrich Avenue South

Saint Paul, MN 55102

Khcorley0311@gmail.com 651.295.1825

March 18, 2025

Councilmember Rebecca Noecker, President
City Council of Saint Paul
310-B City Hall
15 Kellogg Boulevard West
Saint Paul, MN 55102

Delivered Electronically

RE: City Council Appeal: Determination of Similar Use for 560 Randolph Avenue - #24-102442

Dear Rebecca:

This letter comes in support of the appeal of the Determination of Similar Use for 560 Randolph Avenue - a property in my neighborhood of Saint Paul where I have lived for over 35 years.

The determinations recommended by the City's Zoning and Planning Committees continue to ignore planning practice and history, environmental standards, and community wellbeing. I refer to and rely on the written testimony by the Federation and its leadership, an organization led by individuals who conduct themselves with integrity, consistency and transparency.

I have reviewed and supported their appeal of the determination for Similar Use; and I have attended meetings held with the City as well as the hearings in front of the Zoning and Planning Committees. I understand process and procedure, roles and responsibilities, and rely on the City's fulfilling those roles and responsibilities - that is what gives me trust in my City's governance, or in this case, challenges the trust I've held.

The path this has been laid out for the "determination of similar use" is full of pot holes; it circumvents boulders of missing information, distorted maps, and misleading statements. In short, it does not support a process that we can rely on, it does not reflect staff behavior that is committed to values that our community holds, and it does not build confidence in our City's leadership.

RE: City Council Appeal: Determination of Similar Use for 560 Randolph Avenue – #24-102442

You reported in your talk at your fundraiser on February 20th, Rebecca, that you and your colleagues on the City Council spent time, energy and financial resources focused on building trust among yourselves and your staff. I applauded that effort and was relieved to learn that trust was an issue that had been prioritized on your agendas. However, the result we are here in front of the City Council to dispute does not reflect a trustworthy decision or your vote of approval. This result went off course at some point, and it sounds like it continued off course through the rest of the process.

Please fix it now, and continue your efforts, your collective efforts, to establish the elements of trust throughout the City with common core values and practices that we, the community, can rely on and support.

Sincerely,

Kathleen H. Corley, resident

cc:

julia@fortroadfederation.org

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