

July 13, 2007

Donna Drummond  
Department of Planning and Economic Development  
City of Saint Paul  
25 4th St W  
1200 City Hall Annex  
St. Paul, MN 55102

Dear Donna:

On behalf of Transit for Livable Communities, I am submitting comments in support of the city's Central Corridor Development Strategy. As you know, Transit for Livable Communities (TLC) is a community based non-profit organization with offices in St. Paul, whose mission is to improve the quality of life in Minnesota communities through a more balanced transportation system that encourages transit, walking, biking, and transit-oriented-development (TOD). Thousands of TLC supporters live, work and recreate in St. Paul.

One of TLC's primary objectives is to increase state funding for transit, to double the bus system and build a region wide transitways system, including the Central Corridor light rail transit (LRT). TLC provided extensive comments on the Central Corridor DEIS and strongly supports the Central Corridor Development Strategy (CCDS) and proposed interim zoning requirement.

TLC believes that local, state, and federal investment in the Central Corridor LRT will increase the attractiveness and convenience of a variety of alternatives to driving in St. Paul, Minneapolis, and beyond. It will also serve as a critical catalyst to enhance the livability and vitality of current and future residential and commercial properties along this transit line. TLC believes that the CCDS provides critical guidance regarding strategies that the City of St. Paul can adopt to better align land use and transportation planning and goals.

- **Multi-modal planning:** The CCDS makes several important references to planning for increased bicycle, bus, and pedestrian connections to the LRT line. TLC strongly supports creating a Central Corridor Bicycle Strategy, putting pedestrians first (e.g. 4<sup>th</sup> street downtown as a "park street" with pedestrians only during evening events, creation of a "Great Walks" guide, and including "a green, attractive, connected pedestrian environment" as a key component of a TOD regulatory framework), and expanding North-South bus connections.

We highlight the need to identify reliable funding mechanisms for each of these strategies. Possibilities include expanded state investment in transit (see TLC's Transportation Choices 2020 initiative<sup>1</sup>) and applying for bicycle/pedestrian project funding through the CMAQ and Transportation Enhancement programs administered by the Metropolitan Council and through TLC's Non-motorized Transportation Pilot Program (also known as Bike/Walk Twin Cities).

- **Parking management:** TLC supports the parking management strategies outlined in the CCDS and the interim zoning ordinance. In addition, we encourage Saint Paul to adopt a parking cash-out ordinance similar to that used in both Santa Monica and Los Angeles, California.<sup>2</sup> Data from a 2000 report by the Downtown Minneapolis and Saint Paul Area Transportation Management Organizations revealed a high level of subsidized parking for employees working in downtown St. Paul.<sup>3</sup> Mandatory parking cash-out offers a nearly cost-free technique to encourage alternatives to driving alone and to better use valuable urban real estate.
- **Public participation:** The public participation process modeled by the CCDS Task Forces provides an excellent standard for future LRT and land use planning. Exemplary elements of this process include the broad, diverse makeup of the task force, well-advertised meetings and follow-up information (e.g. minutes, key decisions, next steps), proactive involvement of stakeholders not represented on the task force, and a spirit of respectful listening, learning, and decision-making.
- **Station design:** The ten principles for station and LRT design laid out in the CCDS provide appropriate guidance for the City of Saint Paul to coordinate future station area design planning. Streetscaping improvements throughout the Central Corridor are also needed to make the individual LRT stations and nearby destinations as inviting as possible.
- **Density:** High commercial and residential density are critical components of providing cost-effective transit. More expensive capital outlays for light rail transit (vs. buses) correlate with the need for higher density levels. TLC supports all of the density requirements in the CCDS. Further, we emphasize how strongly the Federal Transit Administration (FTA) considers transit-supportive zoning in its competitive "New Starts" application process. Metropolitan Council Chair, Peter Bell, has stated that the Central Corridor LRT project will not move forward without matching funding by the FTA. Thus, it is imperative that St. Paul zoning along the Central Corridor reflects expected future--as opposed to current--land uses.
- **Mixed-use, affordable housing:** This is arguably the most difficult challenge presented in the CCDS. TLC strongly supports the proposed transit-opportunity-

---

<sup>1</sup> The Transportation Choices 2020 Initiative includes new state funding for cities in the metro area to use for bicycle and pedestrian facilities and transit oriented development. For more information see <http://www.tlcmnnesota.org/Events/2007/Legislature/TC2020/TC2020-Index07.html>.

<sup>2</sup> Parking Alternatives: Making Way for Urban Infill and Brownfield Redevelopment, U.S. Environmental Protection Agency, EPA 231-K-99-001, November 1999.

<sup>3</sup> <http://www.mplstmo.org/pdf/finalreport.pdf> page 1.

zone (TOZ), Community Benefit Agreement (CBA), financial and regulatory incentives designed to leverage additional funding for inclusive housing, and efforts to minimize the displacement of current residents along the corridor.

We also note that the travel time savings expected by the investment in LRT technology, along with safe and convenient pedestrian and bicycle access, will have a positive impact on housing affordability in all areas near the LRT corridor. In other words, decreasing the need for residents along the corridor to own cars will increase the share of income that households can direct to housing costs. TLC encourages the city to work closely with carsharing providers (e.g. [HourCar](#)<sup>4</sup>) to maximize the potential for reduced car ownership by residents and workers located along the Central Corridor.

- **Union Depot.** TLC supports planning for the Union Depot to be the St. Paul origin of the LRT corridor.

When advancing transit-oriented-development, the whole is greater than the sum of the parts. Thus, it is critical that all of the strategies identified above are done in concert and with collaboration by actors across sectors.

We appreciate this opportunity to wholeheartedly support the Central Corridor Development Strategy (and interim zoning requirements). We look forward to assisting the City of Saint Paul, in whatever way possible, to secure necessary state funding for the Central Corridor LRT project and expanded North-South bus connections, and also to implement land use planning and policies that maximize transit and community benefits from this investment.

Sincerely,

Lea Schuster  
Executive Director  
Transit for Livable Communities

---

<sup>4</sup> HourCar, a program of the Neighborhood Energy Connection, currently has a carsharing hub at the 46<sup>th</sup> street station of the Hiawatha LRT line, and one at the intersection of Selby and Dale Avenues, which is a relatively short distance from the Central Corridor LRT line. More information is available at: [www.hourcar.org](http://www.hourcar.org).