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The Heights (formerly Hillcrest) Redevelopment
Sustainability Work Group – Letter of Consensus Recommendations

To Monte and the SPPA:

On behalf of The Heights' Sustainability Work Group, we would like to submit our Consensus Recommendations for sustainability objectives to be implemented throughout this new neighborhood. We have begun our letter with a statement of support for the SPPA's current sustainability goals and commitments. We have then added additional recommendations and areas of continued exploration, for your consideration. Beginning with an overview of the Hillcrest Master Plan (recently renamed "The Heights") and a discussion of the SPPA's sustainability goals and commitments to-date, the goal of this work group was to build upon and refine the SPPA's approach, striving toward the establishment of a comprehensively sustainable neighborhood.

Our work group consisted of eight community stakeholders who applied to the SPPA to be considered for participation. Nearly all group members are residents and/or business owners on the East Side of Saint Paul. All group members demonstrated a special interest and subject matter expertise, as well as a willingness to participate in an exploratory discussion of sustainability topics. The Sustainability Work Group met six times between January and June 2022, monthly. These meetings were held virtually, based on the work group members' preferences and availability. Our responsibilities included reaching out to our networks to communicate opportunities and challenges, providing recommendations and constructive feedback, and raising issues and opportunities. After group discussion and review, we have authorized this letter to be sent on June 24th, 2022.

This letter was prepared in collaboration with LHB, the organization that consulted with the SPPA on this community engagement effort and worked with the work group members to prepare a statement of consensus recommendations.

We strongly support the SPPA's sustainability goals for The Heights to:

1. [Achieve a carbon-free neighborhood across the 112-acre site.](#)
 - a. This would demonstrate to the rest of Minnesota, the country, and the world the direction we collectively need to move in regarding new development to forestall the increasingly negative impacts of climate change.

2. [Receive LEED for Communities Platinum certification.](#)
 - a. This positions the East Side to lead the city and region in zero-carbon development.
3. [Require that all buildings be certified using LEED or Green Communities.](#)
4. [Prioritize energy efficiency.](#)
 - a. Minnesota's seasonal patterns make heating and cooling a near-constant energy concern. Weatherizing the buildings at The Heights to the maximum extent possible and including resilient, on-site management will help minimize energy costs, reduce, or eliminate emissions, and provide an ideal space for occupants.
5. [Implement a comprehensive photovoltaic \(PV\) array network across all rooftops, maximizing on-site solar production.](#)
 - a. The goal of generating all The Heights' energy needs on-site helps build a culture of resilience and energy stewardship in response to the climate crisis.
 - b. This commitment also helps St. Paul fulfill our Climate Action and Resilience Plan goal of 200 MW of local renewable energy by 2030 (CARP pg. 39), and helps our utility partner Xcel Energy meet its commitment to [Zero-Carbon Electricity](#) by 2050.
6. [Eliminate natural gas lines and create an all-electric neighborhood.](#)
7. [Require that all buildings participate in a district energy system to serve their heating and cooling needs.](#)
 - a. Aquifer Thermal Energy Storage (ATES) is a compelling option for implementation.
 - b. District geothermal energy, paired with maximized on-site solar, presents an opportunity to put St. Paul on the national map for urban sustainability and for occupants on the site to become associated with truly cutting-edge sustainable practices.
 - c. This supports St. Paul's Climate Action and Resilience Plan's vision for district heating and cooling systems (CARP pg. 40). This also helps our utility partner, Xcel Energy, meet its [Net Zero Vision for Gas](#).
8. [Implement a green infrastructure-oriented, district stormwater management system.](#)
 - a. The proposed district stormwater approach builds on recent progress and leadership in St. Paul at Allianz Field and Highland Bridge.
9. [Include sufficient EV charging stations and EV-ready parking areas within every development parcel to address current and anticipated future needs.](#)
10. [Remove the mercury contamination to enable the site to become accessible to the public and future development.](#)
 - a. A disproportionate number of brownfield sites exist in the Greater East Side of St. Paul, making remediation especially critical to advance environmental justice.
11. [Restore all the wetlands that require contamination remediation and mitigation following the mercury clean-up efforts.](#)
 - a. Protect and preserve non-contaminated wetlands from all construction activities.
 - b. For contaminated wetlands, rebuild a healthy soil profile and native plant community.

Throughout the work group process, we have identified the following additional sustainability priorities and recommendations:

12. Reduce embodied carbon emissions from buildings

- a. Use building materials that have low embodied carbon.
- b. The demonstration of an embodied carbon-neutral or carbon-negative building at The Heights could add tremendously to overall neighborhood appeal and innovation potential. Collectively, we should be reaching “the heights” of sustainability in this new development.
- c. In anticipation of increasing density over time, consider building with future load capacity considerations in mind. Ideally, buildings would be able to expand upward in the future, rather than having to tear down and start again, if additional floors are needed.

13. Support multi-modal, clean transportation

- a. Transportation is Minnesota’s number one source of carbon emissions and one of the most difficult to reduce. While the SPPA and City of St. Paul do not have the authority to establish a new bus line or decide how people will get around, The Heights should include infrastructure that will make clean transportation options easy and convenient, including protected bike lanes and sidewalks that provide safe routes to future public transit.
- b. Promote the use of public transit, walking, and biking with targeted covenants and/or work force agreement stipulations with on-site employers.
- c. Include on-site electric car-sharing within the community.
- d. Minimize the amount of space dedicated to parking and continue to reduce those areas over time as individual car ownership becomes less needed.
- e. Consider incorporating snow melt systems, especially in areas with high foot/roller traffic, as a critical component of accessibility, safety, and universal design principles.
- f. Consider the larger regional bike trail network and how best to tie into amenities such as the Grand Rounds and nearby community assets like the Hayden Heights Library.
- g. Plan for future rapid charging for electric semi-trucks within light industrial parcels, which have significant power requirements and are rapidly evolving.

14. Encourage healthy landscapes

- a. Identify trees that can be preserved in place and explore the possibility of relocating trees that cannot.
- b. Before the remediation/mass grading process begins, consult, and offer compensation to local Indigenous Peoples about harvesting trees in a positive way.
- c. Preserve valuable trees that cannot be saved or relocated for an appropriate use on site after harvest.
- d. Plant as many trees on-site as possible for both resiliency and sustainability, including flood management, and to provide community amenities such as shade, wind breaks, and aesthetic enjoyment.
- e. Combat the urban heat island effect with expansive green spaces and well-connected canopy.

- f. Strengthen neighborhood connectivity and programming with accessible greenspaces, boulevards, community gardens, and active and passive recreation zones.
- g. Species decline is one of Minnesota’s most pressing sustainability challenges. The Heights can be an oasis for pollinating species by encouraging native plants rather than turf grass wherever possible and establishing a biodiverse and resilient tree cover.

15. Maximize locally-owned solar installations

- a. Similarly, to the approach to stormwater and heating and cooling, utilize a district approach to local energy generation.
- b. Allow buildings with large roofs and/or parking lots to host solar panels that meet their own energy needs and host community solar, in which energy generation does not need to be sized to load.
- c. Community solar could be cooperatively owned to ensure that the Renewable Energy Credits (RECs) remain on-site and provide wealth-building opportunities for residents. The value proposition for business owners is that, as hosts, they receive leasing revenue, and they also build connections with the community.
- d. Note that that [MN Statute 216b.164](#) says that the 120% capacity restriction is at the utility's discretion to require or not (see Subd. 4c. Individual system capacity limits). We ask Xcel Energy's support for this bold vision of on-site renewable energy production.

16. Water is Life – Keep it clean and protected

- a. Stormwater and water reuse strategies at both the district and individual parcel-level are very important.
 - a. Consider how this water can be used as a resource for irrigation during drought cycles (captured in ponds, cisterns, etc.), especially as new trees and plantings are being established, and as urban agriculture may develop on-site.
 - b. Encourage developers to incorporate rainwater capture and reuse strategies.
- b. Utilize on-site wetlands as a source to “polish” water quality, even as water may be treated upstream from the wetlands themselves.
- c. With increasing climate change impacts throughout the region, rainfall is becoming more erratic and intense. To this end, we would like to see stormwater management strategies consider underground storage/detention facilities that can accommodate up to a [24-hour duration 100-year storm](#), making the site – and the areas below it further down the watershed – more resilient to flooding.
- d. Explore the use of permeable pavements as a means of recharging subsurface water resources.

17. Include resiliency measures throughout the neighborhood

- a. Highlight the intersections between zero-carbon development and affordable housing, such as health outcomes, energy burden reduction, and resilience.
- b. Highlight the potential for community building and resilience through district-level approaches to infrastructure.

- c. Consider a stretch goal of developing a virtual power plant distributed energy resource as outlined in the Dept. of Energy's [FERC order 2222](#).
 - d. Support “future-proofing” by keeping up-to-date with emerging technologies such as EV logistics.
18. Pursue [affordable and ultra-affordable housing options](#)
- a. Affordable housing contributes to the Port’s goals for creating wealth-building opportunities for the community.
19. Recruit [green job industries and local jobs to the neighborhood](#)
- a. The most desirable kind of employer in The Heights should provide manufacturing, reuse, production, and/or training opportunities that directly support green industries, such as solar panel manufacturing, sustainably sourced products, or aquaponics farming.
 - b. Preference should be given to local contractors and build services within the East Side community, specifically District 2.
20. Utilize [high-efficiency, bird-friendly lighting](#)
- a. All infrastructure lighting throughout the neighborhood should employ LED directional lighting, which is safer for the environment and lasts twice if traditional streetlights.
21. Emphasize the use of [exposed wood in buildings](#)
- a. Mass timber is a major opportunity for beautiful, long-lasting development at The Heights. Wood sequesters significant amounts of carbon within the building structures, reduces embodied carbon associated with construction, increases the aesthetic appeal of buildings, and has a positive impact on human health – reducing stress, blood pressure, and heart rate, and improving digestion, recovery, and repair.
22. Provide [access to daylight in buildings](#)
- a. All light industrial space where workers are present should have access to natural light during daylight hours.
23. Make [The Heights repeatable and educational](#)
- a. The Heights should become well-known in St. Paul and across the state, region, and nation as a model for future developments. Information about the development and how it came to be built should be readily available and publicized, including informational signs on the site itself.

In addition to these recommendations, we have identified the following areas of concern:

24. [Prioritizing affordable housing](#)
- a. There is both a strong desire for affordable housing in this neighborhood and concerns about how it will impact the existing neighborhood. It is unclear how best to implement this need to balance community concerns and what the possibilities and limitations of project financing are.
25. [Allocation of space for parking](#)

- a. Considering that this is an urban site, the current draft development plan for The Heights shows more surface parking and space for motorized vehicles than is ideal. Options for decarbonizing transportation are limited by the poor access to public transit to and from the site.

26. Provide better access to composting infrastructure

- a. The City of St. Paul should provide more readily-available composting options for both residents and businesses.

27. Ensure The Heights is supported by broader mobility infrastructure

- a. Increasing transit frequency and quality of service will improve mobility and sustainability outcomes at The Heights.
- b. To support a broader low-carbon mobility network, the City of St. Paul should conduct a traffic flow analysis that includes the area bounded by White Bear Ave, Larpenteur Ave, McKnight Rd, and Minnehaha Ave. A 4-3 conversion of White Bear Ave would improve safety, provide a better pedestrian experience, and improve pedestrian and business connectivity between The Heights and other mixed-use nodes.

Thank you for the opportunity to provide our detailed input and shared vision for a dynamic, sustainable neighborhood at The Heights. We appreciate your consideration of our Consensus Recommendations.

Sincerely,

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