DEPARTMENT OF PLANNING &
ECONOMIC DEVELOPMENT
Cecile Bedor, Director

CITY OF SAINT PAUL
Christopher B. Coleman, Mayor

25 West Fourth Street
Saint Paul, MN 55102

Telephone: 651-266-6626
Facsimile: 651-228-3341

To: Comprehensive Planning Committee

From: Merritt Clapp-Smith, City Planner

Date: January 27, 2010

Re: Response to Public Comments for 1-22-2010 Public Hearing on Zoning Amendments to Saint Paul's Off-Street Parking Requirements and Design Standards

On January 22, 2010, the Planning Commission held a public hearing on proposed revisions to Saint Paul's off-street parking requirements and design standards – Article II 63.200. Parking Requirements and Article III 63.300. Off-Street Parking Facility Standards and Design.

Two people spoke at the hearing and nine letters of comment were submitted, seven prior to the hearing and two following it. Public comments were received from:

1. Ms. Franco, a Merriam Park resident
2. Ms. Echols, a Highland resident
3. Mr. Mastey, a landscape architect
4. The District 12 St. Anthony Park Board of Directors
5. The Metropolitan Consortium of Community Developers
6. Smart Trips – Saint Paul's Transportation Management Organization
7. Transit for Livable Communities (Barb Thoman at the hearing, as well as a letter)
8. District 2 Planning Council (Chuck Repke at the hearing)
9. The Saint Paul Area Chamber of Commerce
10. Jim Fritz, owner of The Wedding Shoppe on Grand Avenue

The public hearing comments were generally supportive of the proposed parking code revisions, with a few exceptions and with some specific suggestions for additional revisions to the code. The attached spreadsheet summarizes the comments and staff thoughts and recommendations on possible additional revisions for the Comprehensive Planning Committee to consider before forwarding recommended parking code amendments to the full Planning Commission.

Please bring parking code documents previously given to you, in particular items from the 12-22-2009 Planning Commission packet, also available @ http://www.stpaul.gov/offstreetparkingstudy. If you need new copies, please let me know. *Merritt Clapp-Smith 651.266.6547/ merritt.clapp-smith@ci.stpaul.mn.us*

Public Comments for 1-22-2010 Planning Commission hearing on proposed amendments to Saint Paul's off-street parking requirements

Date	Who	Code Section	Section Title	Use Requirement	Feedback / Question	Possible Code Updates	Staff Response
22-Jan-10	Saint Paul Chamber of Commerce	Sec. 63.122	Travel demand management	n/a	Oppose TDM plan requirement for projects over 100 spaces -- it's too regulatory and will discourage development. TDM planning should instead be motivated by market forces. If TDM requirement remains, at a minimum remove the security assurance requirement for TDM plan implementation, which is too burdensome.	No revision; retain proposed code amendment.	TDM plans are an important step for large employers to take to help them identify and implement strategies to reduce employee vehicles miles traveled. A financial guarantee better assures implementation. Saint Paul and the State are pursuing carbon reduction goals and strong measures to help attain these goals are necessary. Smart Trips provides free and thorough TDM plan preparation assistance to employers and can also assist them in many of the implementation steps.
22-Jan-10	Smart Trips				Support TDM requirement -- Travel Demand Management (TDM) plans are important tools for managing the impact that land uses, particularly those that are significant trip generators, have on our city. The TDM requirement as proposed will enable the city to encourage a balance amongst modes that will serve to limit the congestion and air quality impacts associated with significant single occupant vehicle (SOV) trip generation.		
22-Jan-10	Transit for Livable Communities				Support TDM requirement		
22-Jan-10	Smart Trips	Sec. 63.206(d)	Shared parking	n/a	Support the updating and simplification of the shared parking formulas which will encourage better use of this mechanism. Facilitating shared parking amongst businesses promotes efficient land use and can help align parking supply with parking demand.	No revision; retain proposed code amendment.	
22-Jan-10	District 2 Board	Sec. 63.207(a)	Minimum parking requirements by use	Automobile repair station, service station, body shop, specialty store	Oppose changing parking requirements for auto uses to 1/400 because the building size has nothing to do with the parking demand. In addition, auto uses can generate concerns from neighbors and city shouldn't do anything to make their entry into neighborhoods easier.	?	This concern has been raised before and perhaps warrants further analysis to determine if auto use businesses generate more parking per building size than other retail businesses. No other city codes that staff reviewed treated them as a higher requirement than general service businesses.
22-Jan-10	Resident - Franco	Sec. 63.207(a)	Minimum parking requirements by use	Day Care	Day care providers or independent contractors with home offices in residential structures should be required to provide additional off-street parking.	No revision; retain proposed code amendment.	Day care requires one parking space per employee under current and proposed code revisions. There is a short parking peak at drop off and pick up times, but not enough to justify requiring parking for parents, which would then sit empty most of the day. Day care is also a positive small business opportuntiy that licensed professionals can provide from their home and should not be discouraged by requiring extra parking that their is little room to provide in a residential setting.
22-Jan-10	District 12 Board	Sec. 63.207(a)	Minimum parking requirements by use	General retail, service business, etc.	Support consolidation of retail, service and office uses into a 1/400 parking requirement.	No revision; retain proposed code amendment.	
22-Jan-10	Metro Consortium of Community Developers				Generally support code requirement of 1/400 for retail, service and office, **although in some cases this requirement may still be too high** and create more spaces than are needed, especially along mixed-use corridors. Consider larger reductions on mixed use corridors or allow on-street spaces to count towards the parking requirements.	No revision; retain proposed code amendment.	It is not possible to perfectly match every user's parking needs. The proposed requirement of 1/400 attempts to come close to meeting average demand, while consolidating many uses under the same requirement to faciltate reuse. Counting on-street spaces towards an individual project's requirement would be very difficult since street parking is a shared resource without clearly defined boundaries. On-street parking provides overflow space for uses with higher than average parking demand or who have a grandfathered parking deficit and do not meet their current demand.

Public Comments for 1-22-2010 Planning Commission hearing on proposed amendments to Saint Paul's off-street parking requirements

Date	Who	Code Section	Section Title	Use Requirement	Feedback / Question	Possible Code Updates	Staff Response
22-Jan-10	District 2 Board	Sec. 63.207(a)	Minimum parking requirements by use	General retail, service business, etc.	Oppose changing parking requriements for **bingo halls, pawn shops and currency exchanges** because they often have other accessory uses that increase parking demand. In addition, auto uses can generate concerns from neighbors and city shouldn't do anything to make their entry into neighborhoods easier.	No revision; retain proposed code amendment.	The contention that these uses create higher parking demand than other general retail may need to be demonstrated through evidence or research which shows that they have higher requirements in other cities as well, which our research to date has not shown. The contention that the parking standard should be higher to provide a barrier to entry is a different consideration.
22-Jan-10	Resident -- Echols				Oppose consolidating retail requirements to 1/400 -- it does not make sense and **will not provide adequate parking for some retail businesses, particularly destination, national stores** like Trader Joes. National chains should have a higher parking requirement than local, small businesses, due to the higher demand they generate.	No revision; retain proposed code amendment.	It would be difficult to document a discernable difference in parking demand between local and national stores, since demand varies more based on the store's location and success, and in fact our parking utilization studies do not support the commenter's theory. In addition, a different parking requirement based on local versus national ownership would likely conflict with Interstate Commerce laws.
22-Jan-10	Transit for Livable Communities				Support consolidation of retail, service and office uses into a 1/400 parking requirement, because change will enable St. Paul to encourage neighborhood retail.	No revision; retain proposed code amendment.	
22-Jan-10	Transit for Livable Communities	Sec. 63.207(a)	Minimum parking requirements by use	Multiple-family dwelling unit	Residential requirements should be lowered to 1 space per 2 bedroom unit, which is close but still a bit lower than the proposed requirement for multi-family dwellings.	No revision; retain proposed code amendment.	Proposed stepped requirement for multi-family dwellings is designed to better approximate parking demand based on unit size. Mixed use corridor reductions of 10% will help bring down parking requirements for housing projects on transit served corridors.
22-Jan-10	Saint Paul Chamber of Commerce	Sec. 63.207(a)	Minimum parking requirements by use	n/a	Strongly support reducing parking requirements by use to encourage efficient land use and establish greater simplicity and uniformity in Saint Paul's parking code.	No revision; retain proposed code amendment.	
22-Jan-10	Smart Trips				Support the move towards consolidated and simplified parking requirements and acknowledge the positive impact that this will have on reuse and redevelopment in the city.		
22-Jan-10	District 2 Board	Sec. 63.207(a)	Minimum parking requirements by use	Restaurant, carry-out, deli, fast food, with or without strong malt/wine or liquor	Support consolidation of eating places at 1/400 along with other commercial uses to faciltiate business space reuse and easy introduction of eating places onto commercial streets.	No revision; retain proposed code amendment.	
22-Jan-10	District 12 Board				Support proposed code requirement of 1/400 for eating places, because it would allow more eating places and cafes to move into the existing storefronts in the neighborhood without having to add parking, which there is no room to do.		
22-Jan-10	Metro Consortium of Community Developers				Support proposed code requirement of 1/400 for eating places, because it requires fewer parking spaces, thereby reducing impervious surface and encouraging denser, sustainable living, and because it faciliates commercial space reuse between businesses and eating establishments.		
22-Jan-10	Transit for Livable Communities				Support proposed code requirement of 1/400 for eating places, because change will enable St. Paul to encourage neighborhood retail.		
22-Jan-10	Saint Paul Chamber of Commerce	Sec. 63.207(b)	Reduced parking minimums	n/a	Support provisions allowing users to further reduce minimum parking, such as through shared parking, share vehicle parking and mixed-use corridor reductions.	No revision; retain proposed code amendment.	
22-Jan-10	Smart Trips				Support the provisions to reduce the number of required parking spaces and are pleased that the reductions are tied to travel demand management strategies such as biking and shared vehicle use.		
22-Jan-10	Transit for Livable Communities				Support additional provisions to reduce required minimum parking, including shared parking, bicycle parking and car sharing.		

Date	Who	Code Section	Section Title	Use Requirement	Feedback / Question	Possible Code Updates	Staff Response
22-Jan-10	Business owner - Fritz	Sec. 63.207(c), (d)	Maximum parking requirements by use	n/a	Oppose off-street parking maximums, especially in areas such as Grand Avenue where they may contribute to a greater overall parking problem and affect businesses in high parking demand areas, such as the Wedding Shoppe. A more reasonable solution is to add a requirement that allows businesses to exceed the maximum if they add more landscaping, tree planting, etc. to reduce the negative affects of a large parking lot. The additional cost of this requirement would discourage oversupply unless it was absolutely necessary and additional green space would reduce environmental concerns.	No revision; retain proposed code amendment.	Parking maximums are a very common best practice parking policy across the county today, as the negative consequences of the oversupply of underused parking have been more clearly identified. Proposed maximum of 170% generally and 300% for eating places is based on parking use studies and is designed to accommodate the higher demand uses within each use category, while still setting an upper limit to cap the provision of unneeded parking. A lower maximum in certain TOD districts, such as Central Corridor, may be appropriate to adopt. Projects with uniquely high parking demand or interested in parking for ancillary uses can apply for a CUP, which is a longer but not untenable process.
22-Jan-10	Saint Paul Chamber of Commerce				Oppose maximum parking limits, because they will discourage development. Projects sometimes built above maximum for seasonal use or future/ancillary development and should be allowed to do so. Option of structured parking to exceed maximum is a large cost or site development burden. Also, difference between 63.207c and d can be confusing -- Retitle Section 63.207c to something like "Conditions when minimum parking exceeded up to the maximum".		
22-Jan-10	Smart Trips				Lower the maximum -- Establish a uniform maximum across all uses and a lower maximum to encourage more dense development. Provide some clarification as to how the provisions for exceeding the minimum are related to proposed parking supply and demand. In this instance, requiring a TDM plan would help a developer or business better understand projected demand and assess whether or not exceeding the minimum is necessary.		
22-Jan-10	Transit for Livable Communities				Lower the maximum -- Parking requirements should be lower than 170% of minimum, since excess parking has negative impacts of runoff, heat island effect, compromised pedestrian environment and loss of tax base. Saint Paul should be very selective about permitting parking in excess of minimum requirements.		
22-Jan-10	Saint Paul Chamber of Commerce	Sec. 63.208	Parking requirements for other uses	n/a	Support change allowing Zoning Administrator to determine similar use for parking requirements, instead of the Planning Commission, as this will encourage and expedite development projects.	No revision; retain proposed code amendment.	
22-Jan-10	Smart Trips	Sec. 63.210	Bicycle parking	n/a	Ubiquitous bicycle parking helps to encourage an increase in bicycle mode share. Requiring a minimum of bike parking based on the number of motor vehicle spaces will encourage a prevalence of bike parking across the city. The ability to substitute a percentage of the minimum requirements with a prescribed level of bicycle parking offers an incentive to go beyond the minimum.	No revision; retain proposed code amendment.	
22-Jan-10	Smart Trips	Sec. 63.211	Shared vehicle parking	n/a	Public shared vehicle programs enable households and individuals to downsize or forgo owning a vehicle. Tying a reduction in parking spaces to on-site car sharing will encourage an expansion of shared vehicle 'hubs' in St. Paul.	No revision; retain proposed code amendment.	
22-Jan-10	Metro Consortium of Community Developers	Sec. 63.212	Mixed-use Corridors	n/a	A 10% reduction for mixed-use corridors may not be enough for some small businesses on transit friendly streets with customers who don't drive (e.g., a corner grocery on Rice St)	No revision; retain proposed code amendment.	During the fall and winter comment period, there was varied feedback on having an additional parking reduction along mixed use corridors, with some people wanting a greater reduction than 10% and some wanting no reduction since they felt that the proposed code requirement revisions for businesses were already dropping alot. Given the varied feedback, staff recommend a 10% reduction to start with on mixed use corridors, followed by a re-evaluation in a year or two to
22-Jan-10	Smart Trips				Mixed-use corridors promote walking, biking, and transit use by positioning a variety of land-uses in close proximity. Tying parking reductions to mixed-use corridors helps to support density in these corridors by encouraging efficient land use.		
22-Jan-10	Transit for Livable Communities				Support 10% reduction to minimum parking for mixed use corridors.		

Public Comments for 1-22-2010 Planning Commission hearing on proposed amendments to Saint Paul's off-street parking requirements

Date	Who	Code Section	Section Title	Use Requirement	Feedback / Question	Possible Code Updates	Staff Response
22-Jan-10	Smart Trips	Sec. 63.213	Preferential parking spaces	n/a	Tie the provision of preferential parking spaces to a TDM plan so that office, industrial and institutional uses identify strategies to promote and monitor these spaces to assure maximum usage.	?	May be a good point.
22-Jan-10	Smart Trips	Sec. 63.310	Entrances and exits	n/a	Support the amended language that calls for minimizing curb cuts as the prevalence of curb cuts undermines walkability and safety by increasing interactions between vehicles and pedestrians.	No revision; retain proposed code amendment.	
22-Jan-10	Landscape architect - Mastey	Sec. 63.311	Wheel stops	n/a	Remove earth berms as a permitted wheel stop treatment because earth berms won't provide adequate durability to define a vehicle stopping point.	**Amend** proposed code language to remove earth berms as a wheel stop option.	Good comment.
22-Jan-10	Landscape architect - Mastey	Sec. 63.314	Landscaping	n/a	Perimeter landscaping -- Increase perimeter landscaping width to 8 feet from 4 feet -- 4 feet isn't wide enough to sustain plantings	No revision; retain proposed code amendment.	A wider perimeter area would be nice, but may not be realistic in the context of our built up, narrow lot pattern in Saint Paul.
22-Jan-10	Landscape architect - Mastey	Sec. 63.314	Landscaping	n/a	Interior landscaping -- Lower the threshhold that requires interior landscaping from the proposed 20 spaces to 10 spaces, because the shading and greening benefits of interior landscaping should apply to more lots, not just large ones.	No revision; retain proposed code amendment.	
22-Jan-10	Landscape architect - Mastey	Sec. 63.314	Landscaping	n/a	Tree plantings -- Increase required shade trees from 1 tree per 5 spaces to 1 tree per two spaces, in order to succeed in creating a shade canopy. Increase minimum planting space for tree wells from 18 square feet, which isn't nearly large enough to sustain healthy tree growth, to 64 square feet which is the minimum size identified by urban forestry folks and research.	No revision on spacing, but **consider amending** the minimum tree well size after consultation with City forester.	Proposed tree planting requirement is an enhancement of our current requirements and the placement of 1 tree every 5 spaces can provide decent shade coverage if large tree species are used. However, comment on minimum tree well size is important and further research should be done to assure that landscape requirements will support healthy tree growth.
22-Jan-10	Landscape architect - Mastey	Sec. 63.314	Landscaping	n/a	Internal walkways -- Lower threshhold that requires interior walkways in larger lots from proposed 125,000 sq ft to 40,000 sq ft.	No revision; retain proposed code amendment.	Proposed introduction of internal walkways requirement is already a big step. It's implementation should be tested for a couple of years before determining whether to apply it to smaller sites.
22-Jan-10	Smart Trips	Sec. 63.314	Landscaping	n/a	Support requiring internal walkways for parking facilities over 125,000 as a strategy for improving walkability. Requiring the walkways to provide access to parking areas as well as the public sidewalk system on adjacent streets is especially important for promoting transportation options.	No revision; retain proposed code amendment.	
22-Jan-10	Metro Consortium of Community Developers	Sec. 63.314	Landscaping	n/a	Support enhancement of the the landscaping requirements, including safer pedestrian circulation in large "big box" parking lots.	No revision; retain proposed code amendment.	The proposed internal walkways for large parking lots would improve pedestrian safety.
22-Jan-10	Transit for Livable Communities	Sec. 63.314	Landscaping	n/a	Support enhancement of the the landscaping requirements, including shade trees, internal walkways and wheel stops.	Possible revisions as noted above.	