



DATE: June 9, 2021

TO: Comprehensive and Neighborhood Planning Committee

FROM: Tony Johnson, Senior City Planner

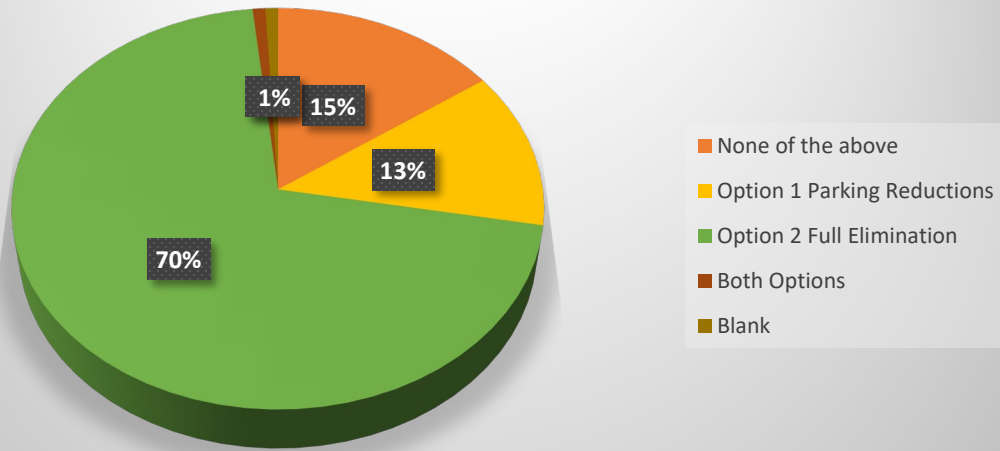
RE: Parking Study Engagement and Public Comment

Engagement and Public Comment Summary:

On March 19, 2021¹, the Planning Commission released the parking study for review and public comment. After the study was released for public comment staff offered to give presentations to any district council, business association, or community organization in Saint Paul, in addition to providing two webinars that were open to the general public. At the request of the district councils and other organizations, staff gave presentations to Sustain Saint Paul, The Southeast Community Organization District Council, The Saint Paul Area Chamber of Commerce, The North End District Council, The Mac-Groveland District Council, The West 7th/Fort Road Federation, The Highland Business Association, and the Hamline Midway Coalition. On April 30, 2021, the Planning Commission held a public hearing and the public comment period remained open until May 7, 2021. In total, 237 comments were submitted online, and 4 people spoke at the public hearing who also submitted comments. Roughly 70% of those commenting indicated that they preferred the option to eliminate minimum parking requirements, primarily citing the potential for increased affordability in new developments and reduction in carbon emissions from shifting travel behavior away from predominantly single occupancy vehicles as the rationale for their choice.

¹ To read the full memo please visit www.stpaul.gov/parking-study

Parking Study Public Testimony



Options	Raw number	Percentage
None of the above	36	15%
Option 1: Parking Reductions	30	13%
Option 2: Full Elimination	167	70%
Both Options	2	1%
Blank	2	1%
Total	237	100%

Three of the public comments suggested specific changes to the proposed amendments, which the Planning Commission may want to consider for a future study. These changes include:

- Lowering the threshold for when a travel demand management plan is required.
- Lowering the threshold for when unbundling parking is required.
- Lowering parking maximums.
- Specifying the type of bike parking required (long-term versus short term) particularly for residential and office uses.
- Increasing the bike parking requirement to 1 per unit.

Because of the extent of the current package of amendments, staff does not recommend that the planning commission pursue these changes at this time. Staff will need time to adjust to the new provisions in order to successfully implement them and to collect data to inform any future studies and amendments, particularly in regard to the travel demand management and unbundling provisions proposed by this study.

The threshold for travel demand management was intentionally calibrated to require a similar number of travel demand management plans as the current ordinance and

program because of staff capacity. If the threshold is lowered there may not be enough staff to successfully implement the program, and it is very likely that many developments that were required to submit travel demand management plans would not be inspected to determine compliance with the plan submitted and approved by the city. Cities with similar programs and more aggressive requirements have staff that exclusively implement their travel demand management programs. At this time, hiring additional staff to implement our travel demand management ordinance and program is not being considered by the city of Saint Paul.

Additional amendments:

Staff is recommending that two additional amendments be included in the study. In the reduced minimums option, staff is recommending an amendment to section 63.207 (b), *off-street parking reductions*, to clarify the methodology for calculating a reduction in minimum parking requirements when multiple parking reductions are applicable for a use.

For both options, staff is recommending amendments to section 63.401, off-street loading and unloading. The current language sets a standard for a minimum amount of off-street loading space, which is determined by the gross floor area of a use. The current language does not allow staff to consider the business needs and operations when determining the size of a loading and unloading area, which may result in the city requiring more off-street loading and unloading area than is necessary to accommodate the loading and unloading needs of a business. The proposed amendment would give site plan review staff the flexibility to determine the appropriate size and character of an off-street loading area for a proposed use by striking overly prescriptive standards.

The following are the proposed additional amendments:

Sec. 63.207(b) *Off-street parking reductions*:

In calculating the parking reduction for a use, when multiple parking reductions are applicable, the percentages for the parking reductions shall be added together and the sum of the percentages shall be applied to the minimum parking requirement set forth in table 63.207.

Sec. 63.401. Off-street loading and unloading.

~~On the same premises with every building, structure or part thereof involving~~ When a use includes an accessory loading and unloading area for such activities as the receipt and distribution of vehicles, materials, merchandise, supplies or equipment, there shall be provided and maintained on the zoning lot, ~~in addition to off-street parking in conformance with the requirements of this code,~~ adequate space for maneuvering, standing, loading and unloading in order to avoid undue interference with public use of dedicated rights-of-way. Such space shall be provided as follows:

- a) All spaces shall be laid out in dimensions that can accommodate the expected delivery vehicle. ~~of at least ten (10) by fifty (50) feet or five hundred (500) square feet in area, with a clearance of at least fourteen (14) feet in height.~~ Loading areas and dock approaches shall be provided with a pavement having a permanent,

durable and dustless surface. All spaces shall be provided in at least the following ratio:

Gross Floor Area (In Square Feet)	Loading and Unloading Space Required in Terms of Square Feet of Gross Floor Area
0—1,400	None
1,401—20,000	One space
20,001—100,000	One space plus one space for each 20,000 square feet in excess of 20,001 square feet
100,001 and over	Five (5) spaces

- b) No off-street loading space shall be located in any yard adjoining any residential use or zoning district.
- c) Off-street loading shall not conflict with required off-street parking or the system of pedestrian flow, and shall not obstruct building ingress and egress.
- d) Space shall be provided within the off-street loading area so that any maneuvering back into or out of a loading space can be conducted outside of any public right-of-way except where the applicant can establish, in the review of a site plan application, that allowance of such maneuvering would not create or aggravate undue interference with public use of dedicated right-of-way.

Staff recommended action:

Staff recommends that the Comprehensive and Neighborhood Planning Committee select one of the packages of amendments— Parking Reductions or Full Elimination — and forward it to the full Planning Commission to make a recommendation to the City Council for approval.