



To: Spencer Miller-Johnson
spencer.miller-johnson@stpaul.gov

Re: T District Zoning Study – Union Park District Council recommendations

Mr. Miller-Johnson,

Thank you for the opportunity to provide input regarding the City's proposed revisions to the T Districts zoning code. And thank you and your colleagues for your excellent support materials and presentations, and for your detailed response to our request for additional information.

We appreciate your team's willingness to think beyond the established norms in order to improve clarity, consistency, timeliness, and administrative burden. We enthusiastically embrace these goals, and offer the following comments to better achieve those goals.

Sincerely,

Sarah Dvorak
Union Park District Council President

Content:

- Background
- Major Concern – Traditional Neighborhood District Uses (Oppose the Addition of Storage Facility)
- Major Concern – Dimensional Standards Table (Clarity)
- Major Concern – Dimensional Standards Table (Height – Maximum)
- Major Concern – Solar Access Protection
- Major Concern – Dimensional Standards Table (Height – Minimum)
- Major Concern – Dimensional Standards Table (Calculating Lot Size)
- Major Concern – Assuring Visual Interest and Variety
- Moderate Concern – The Name (“Traditional Neighborhood”)
- Moderate Concern – Editing Errors
- Minor Concern – Intent (Description of the T Districts)
- Minor Concern – “Intensity” vs “Density”
- Minor Concern – “Courtyard Building” vs “Courtyard”

UPDC Vision for T District Zoning (Zoning At Neighborhood Nodes and Along Transit Corridors):

These are some of the structures that we consider to be optimal land use along transit corridors / structures that we used as a frame of reference for our recommendations for T District dimensional standards:

T2 (4 stories): The Finn Apartments (725 Cleveland Avenue South, Saint Paul)

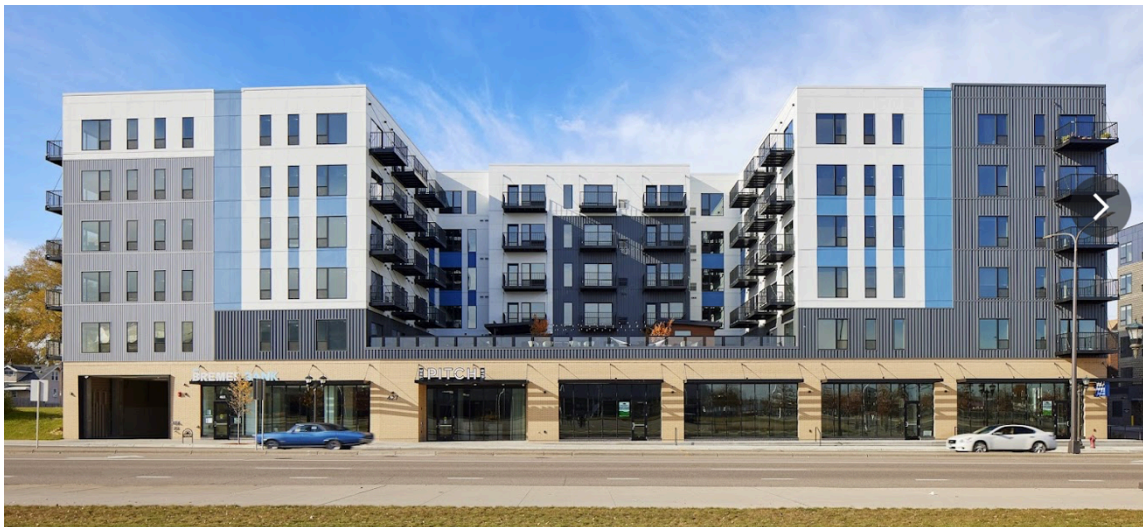


Per Spencer Miller-Johnson, CNU-A, Senior City Planner:

Zoned T2, which means that currently the height limit would be 35 feet. If the building were to be set back further from the street, it could go higher.

The building constructed is 45 feet. The developer likely received an approved conditional use permit for height, which includes a public hearing and Planning Commission review/decision.

T3 (6 stories): The Pitch Apartments (427 Snelling Avenue North, Saint Paul)



Per Spencer Miller-Johnson, CNU-A, Senior City Planner:

Zoned T3, which means that currently the height limit would be 55 feet for a mixed-use building. If the building were to be set back further from the street, it could go higher.

The building constructed is 75 feet. I do see that it received an approved conditional use permit for height in 2019.

MAJOR CONCERN – T DISTRICT USES (OPPOSE THE ADDITION OF STORAGE FACILITY)
Table 66.321

We firmly oppose the development of new storage facilities in neighborhood nodes and along transit corridors – therefore, we firmly oppose the addition of storage facilities to the approved uses in T Districts.

MAJOR CONCERN – DIMENSIONAL STANDARDS TABLE (CLARITY)
(pages 4-8)

We enthusiastically support the goal to “streamline the T District design standards, making them easier to understand and administer.” However, we believe that the proposed design standards need considerably more streamlining. Our recommendations:

- Formula:
form envelope met (setbacks + height criteria) + solar access preserved = approval
- Clear criteria by right rather than through the conditional use permit process, so that determinations are predictable and timely (and relatively time efficient to process), rather than discretionary, inconsistent, and slow (and relatively time-consuming to process).
“Maximum” means maximum / Footnotes for clarification only, not for adjustments / bonuses
Corollary: Because bonuses in footnotes mean that “Maximum” doesn’t mean maximum, bonuses in footnotes would be eliminated.
[You could have one table for dimensional standards without a density bonus and another table for dimensional standards with a density bonus – see examples below.]
- Replace FAR with building height (minimum and maximum), number of stories, and yard setbacks. (You don’t want really want short wide buildings and you really don’t want tall narrow buildings.)¹

Rather than this:

Building Type by Zoning District	Density Intensity	Lot AreaSize Min. imum (per principal unit)	Lot Width Min.	Building Height (feet)		Yard Setbacks (feet)		
	Min.—Max.(a)	Area (sq. ft.)(a)	Width (feet)	Min.	Max.	Front Min.—Max.	Side Min.	Rear Min.

Consider this:

Traditional Neighborhood & Transit Corridor Dimensional Standards							
Zoning District	Lot Area (sq ft) Min	Lot Width (feet) Min	Yard Setbacks (feet)			Building Ht (feet) Min-Max	Stories Min-Max
			Front Min-Max	Side Min-Max	Rear Min-Max		
T1							1-2
T2							2-4
T3							3-6
T4							4-?

Or these (both tables would be included in the zoning code):

Traditional Neighborhood & Transit Corridor Dimensional Standards WITHOUT Density Bonus							
Zoning District	Lot Area (sq ft) Min	Lot Width (feet) Min	Yard Setbacks (feet)			Building Ht (feet) Min-Max	Stories Min-Max
			Front Min-Max	Side Min-Max	Rear Min-Max		
T1							1-2
T2							2-3
T3							3-5
T4							4-?

Traditional Neighborhood & Transit Corridor Dimensional Standards WITH Density Bonus							
Zoning District	Lot Area (sq ft) Min	Lot Width (feet) Min	Yard Setbacks (feet)			Building Ht (feet) Min-Max	Stories Min-Max
			Front Min-Max	Side Min-Max	Rear Min-Max		
T1							1-2
T2							2-4
T3							3-6
T4							4-?

¹Though Floor Area Ratio (FAR) is beneficial in downtown districts, we object to its use in neighborhood nodes and transit corridors for the following reasons:

- o FAR is a barrier to discussion with most people. It often has to be explained, and often requires diagrams to explain it (with varying levels of success). And, despite best attempts to explain it, FAR often inhibits the sharing of insights. Rather than inviting conversation, FAR tends to intimidate.
- o FAR is a barrier to visualization for most people.
- o The flexibility that FAR offers is not the flexibility that we ought to offer in neighborhood nodes and along transit corridors. Structures in neighborhood nodes and along transit corridors should snug up close to the sidewalk. With FAR, a tall narrow building is interchangeable with a short wide building. However, in neighborhood nodes and along transit corridors, neither is optimal use of the lot.
- o FAR does not control solar access / shadowing.
 - On an east-west street, a 2 story C-shaped building that occupies ½ of the lot (FAR 1.0) casts the same shadow as a 2 story building that occupies 100% of the lot (FAR 2.0).
 - On a north-south street, a 3 story L-shaped building that occupies 1/3 of the lot (FAR 1.0) casts the same shadow as a 3 story building that occupies 100% of the lot (FAR 3.0).

FAR was designed to limit human occupancy [by limiting square footage] in order to limit pedestrian, private vehicle, and transit traffic impact. It is an important tool for congested downtowns, allowing developers flexibility without exacerbating congestion. However, St. Paul's downtown is zoned B4 and B5 (not T). In nodes and along transit corridors, a wide short building is not interchangeable with a narrow tall building – and neither are particularly desirable.

Note: Our views about FAR have been shaped in large part by the June 1958 American Society of Planning Officials article. We acknowledge that the article is old, but it is the most comprehensive discussion that we found, and appears to be the basis for the recent articles that we found.
<https://www.planning.org/pas/reports/report111.htm>

MAJOR CONCERN – DIMENSIONAL STANDARDS TABLE (HEIGHT - MAXIMUM)

(pages 4-8)

City's proposal (maximum):

- | | |
|----|--|
| T1 | 35 feet + footnote:
ed (may exceed the maximum if set back from side and rear setback lines
a distance equal to additional height) |
| T2 | 35-45 feet + footnote:
ed (may exceed the maximum if set back from side and rear setback lines
a distance equal to additional height) |
| T3 | 55 feet + footnotes:
ed (may exceed the maximum if set back from side and rear setback lines
a distance equal to additional height),
gf (maximum height of ninety (90) feet may be permitted with a conditional
use permit. Structures shall must be stepped back one (1) foot from all setback lines for every
two and one-half (2½) feet of height over seventy-five (75) feet. A shadow study may be
required for a conditional use permit application to help determine the impact of the
additional height.) |
| T4 | 75 feet footnotes:
ed (may exceed the maximum if set back from side and rear setback lines
a distance equal to additional height), |

hg) Additional height may be permitted with a conditional use permit. Structures ~~shall~~ must be stepped back one (1) foot from all setback lines for every two and one-half (2½) feet of height over seventy-five (75) feet. A shadow study may be required for a conditional use permit application to help determine the impact of the additional height.

(ed) Except in the river corridor overlay district, hHeight of structures may exceed the maximum if set back from side and rear setback lines a distance equal to additional height. Structures ~~shall~~ must be no more than ~~twenty-five (25)~~ thirty (30) feet high along side and rear property lines ~~abutting~~ adjoining RL-H2RT2 residential districts at a common property line or alley; structures may exceed this ~~twenty-five (25)~~ thirty (30) foot height limit if stepped back from side and rear property lines a distance equal to the additional height. Additional building height is permitted when stated in an adopted T District master plan.

(fe) A maximum height of forty-five (45) feet may be permitted with a conditional use permit. In T1 -T3, the FAR maximum may be increased by 0.5 if at least ten (10) percent of new dwelling units are leased at a rate at or below the sixty (60) percent of the area median income (AMI) rent limits as defined by the Multifamily Tax Subsidy Program rent and income limits published by Minnesota Housing, and are affordable to households earning up to sixty (60) percent of the area median income for at least ten (10) years. The FAR maximum may be increased by an additional 0.5 (total of 1.0 increase) if at least twenty (20) percent of new dwelling units are leased at a rate at or below the sixty (60) percent of the area median income (AMI) rent limits as defined by the Multifamily Tax Subsidy Program rent and income limits published by Minnesota Housing, and are affordable to households earning up to sixty (60) percent of the area median income for at least ten (10) years. Each unit required to be affordable must be occupied by a household earning up to sixty (60) percent of the area median income. Prior to issuance of a building permit for the new building (or building expansion or conversion), demonstration of the commitment to affordable housing in accordance with this footnote must be provided as a deed restriction or other contractual agreement with the city, or a city housing and redevelopment authority financing agreement or other similar financing agreement. Upon occupancy of the units, documentation of the households' income qualifications is required.

(gf) Except in the river corridor overlay district and within light rail station areas between Lexington Parkway and Marion Street, aA maximum height of ninety (90) feet may be permitted with a conditional use permit. Structures ~~shall~~ must be stepped back one (1) foot from all setback lines for every two and one-half (2½) feet of height over seventy-five (75) feet. A shadow study may be required for a conditional use permit application to help determine the impact of the additional height. Additional building height is permitted when stated in an adopted T District master plan.

(hg) Additional height may be permitted with a conditional use permit. Structures ~~shall~~ must be stepped back one (1) foot from all setback lines for every two and one-half (2½) feet of height over seventy-five (75) feet. A shadow study may be required for a conditional use permit application to help determine the impact of the additional height. Additional building height is permitted when stated in an adopted T District master plan.

UPDC Proposal:

In this table, “Minimum”/“Min” means minimum (including all possible bonuses and adjustments), and “Maximum”/“Max” means maximum (including all possible bonuses and adjustments).

(Which is to say, minimum means that this is where the conversation ends rather than where it begins, and maximum means that this is where the conversation ends rather than where it begins.)

Traditional Neighborhood & Transit Corridor Dimensional Standards (for areas not regulated by a master plan)						
Zoning District	Lot Area (sq ft) Min	Lot Width (feet) Min	Yard Setbacks (feet)			Building Ht (feet) Min-Max
			Front Min-Max	Side Min-Max	Rear Min-Max	Stories Min-Max
T1						20-25
T2						25-50
T3						37.5-75
T4						50-?

Note #1: Each of the areas regulated by a master plan should have their own dimensional standards table.

Note #2: Based on their approach to dimensional standards tables, it is our guess that City Planners are cited frequently for speeding, because they believe that the posted speed limit is not the end of the conversation with the Highway Patrol but just the beginning.

MAJOR CONCERN – SOLAR ACCESS PROTECTION

Require shadow studies above 4 stories / 50 feet, with clear objective criteria for approval.
(Currently, for T3 and T4 “A shadow study may be required for a conditional use permit application to help determine the impact of the additional height.”)

Develop specific criteria for minimum acceptable solar access, preferably based on:

- o the shadows that would be cast on December 21 (the longest shadows), and
 - o a minimum number of hours of sunlight for every section of the property
- [Note: On December 21 (the shortest day of the year), there are 8 hours and 46 minutes of daylight.]
[Perhaps a reasonable minimum would be 4 hours and 30 minutes of sunlight on December 21.]

MAJOR CONCERN – DIMENSIONAL STANDARDS TABLE (HEIGHT - MINIMUM)

(pages 4-8)

City’s proposal (minimum):

T1 none
T2 none

Note: On pages 10-11, the zoning code states:

(105) *Building roofline design height - treatment of 1-story buildings.* New buildings of two (2) or more stories are encouraged. One-story buildings shall must be designed to convey an impression of greater height in relation to the street with design elements such as. This can be achieved through the use of pitched roofs with dormers or gables facing the street, a higher tall parapets, and/or the use of an intermediate cornice line to separate the ground floor and the roof upper level.

T3 25 feet
T4 25 feet

UPDC Proposal:

In this table, “Minimum”/“Min” means minimum (including all possible adjustments), and “Maximum”/“Max” means maximum (including all possible adjustments).

(Which is to say, minimum means that this is where the conversation ends rather than where it begins, and maximum means that this is where the conversation ends rather than where it begins.)

Traditional Neighborhood & Transit Corridor Dimensional Standards (for areas not regulated by a master plan)						
Zoning District	Lot Area (sq ft) Min	Lot Width (feet) Min	Yard Setbacks (feet)			Building Ht (feet) Min-Max
			Front Min-Max	Side Min-Max	Rear Min-Max	Stories Min-Max
T1						20-25
T2						25-50
T3						37.5-75
T4						50-?

Though we did not intend to overly simplify our recommendations regarding building height, after contemplating buildings that we consider to be optimal land us in neighborhood nodes and along transit corridors, we ended up with:

District	Stories (Minimum)	Stories (Maximum)
T1	1	2
T2	2	4
T3	3	6
T4	4	?

MAJOR CONCERN – DIMENSIONAL STANDARDS TABLE (CALCULATING LOT SIZE)

Section 66.331 Footnote (a)

(a) In calculating the area of a lot that adjoins a dedicated public alley, for the purpose of applying minimum lot area and maximum density requirements, one-half the width of such alley adjoining the lot shall be considered part of the lot.

The alley is not an area of any lot that could be developed – therefore, we oppose the use of any portion of the alley for the calculation of lot size, for any and all purposes.

MAJOR CONCERN (WITHOUT A PROPOSED SOLUTION) – ASSURING VISUAL INTEREST AND VARIETY

Recent experience with the H District construction has raised our awareness of the importance of visual interest and variety. We don’t have an answer for how to assure this, but we hope that City Planners and Planning Commission members will set aside time to consider incentives and requirements to maintain and improve our visual vitality.

MODERATE CONCERN – THE NAME (“TRADITIONAL NEIGHBORHOOD”)

Feedback submitted during the T District Zoning Study included the suggestion to “be clearer about what the T districts are, where they are, and why.” (T District Zoning Study page 4-5)
“be clearer about what the T districts are, where they are, and why.”

Examples of zoning district names that we believe clearly imply their primary use:

R Residential
RM Residential Multifamily
B Business
I Industrial

Examples of zoning district names that we believe do not clearly imply their primary use:

T Traditional Neighborhood [mixed use along transit corridors]
H Historic [residential]

The updated descriptions of the T districts state that they are designed primarily for use in neighborhood nodes and along transit corridors. We believe that the name “Traditional Neighborhood & Transit Corridor” or the name “Transit Corridor” align better with the primary use than the current name “Traditional Neighborhood”.

MODERATE CONCERN – NEW EDITING ERROR

(page 10 of 32)

(105) *Building roofline design height - treatment of 1-story buildings. New buildings of two (2) or more stories are encouraged. One-story buildings shall must be designed to convey an impression of greater height in relation to the street with design elements such as. This can be achieved through the use of pitched roofs with dormers or gables facing the street, a higher tall parapets, and/or the use of an intermediate cornice line to separate the ground floor and the*

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“such as” – such as what???

MODERATE CONCERN – OLD EDITING ERROR

(page 18 of 32)

Rather than this:

Sec. 63.110. Building drequired yard sixteen (16) inches plus two (2) inches for each foot of width of the required side yard and are not subject to lot coverage requirements.

(e) Air conditioning condensers may be permitted in required side and rear yards and nonrequired front yards and are not subject to lot coverage requirements.

(f) Attached uncovered balconies located on the second story and above may project up to five (5) feet into a required yard alonesign standards.

Consider this:

Sec. 63.110. Building design standards.

~~R~~required yard sixteen (16) inches plus two (2) inches for each foot of width of the required side yard and are not subject to lot coverage requirements.

(e) Air conditioning condensers may be permitted in required side and rear yards and nonrequired front yards and are not subject to lot coverage requirements.

(f) Attached uncovered balconies located on the second story and above may project up to five (5) feet into a required yard alone~~design standards~~.

MINOR CONCERN – INTENT (DESCRIPTION OF THE T DISTRICTS)

(pages 1-2)

Division 1. 66.310. Intent

Please consider using a consistent format for each T zone description:

- “intended to”, followed by
- “requires”, followed by
- “encourages, but does not require”, followed by
- “designed primarily for”

Sec. 66.312. Intent, T1 ~~low density transit corridor~~ district.

The T1 traditional neighborhood district is intended to foster and support compact, pedestrian-oriented commercial, residential, civic, and institutional development of limited size that, in turn, supports and increases transit usage. It encourages, but does not require, a variety of uses and housing types, with attention to the amount and placement of parking and transitions to adjacent residential neighborhoods. The T1 traditional neighborhood district is designed primarily for corner commercial buildings in residential areas and to serve as a transitional use of land along major thoroughfares, and between commercial or industrial districts and residential districts or other less intensive land uses.

(Ord. No. 11-27, § 1, 4-20-11)

Sec. 66.313. Intent, T2 ~~medium density transit corridor~~ district.

The T2 traditional neighborhood district is intended to foster and support compact, pedestrian-oriented commercial, residential, civic, and institutional development of medium density that, in turn, supports and increases transit usage. It encourages, but does not require, a variety of uses and housing types, with attention to the amount and placement of parking and transitions to adjacent residential neighborhoods. The T2 traditional neighborhood district is designed primarily for use in existing or potential neighborhood nodes and existing or planned transit corridors.

(Ord. No. 11-27, § 1, 4-20-11)

Sec. 66.314. Intent, T3 ~~medium density transit corridor~~ district.

(a) (b) The T3 traditional neighborhood district is intended to foster and support compact, pedestrian-oriented commercial, residential, civic, and institutional development of medium density that, in turn, supports and increases transit usage. It encourages, but does not require, a variety of uses and housing types, with attention to the amount and placement of parking. The T3 traditional neighborhood district is designed primarily for use in neighborhood nodes. Neighborhood nodes are compact, mixed-use areas that provide shops, services, neighborhood-scale civic and institutional uses, recreational facilities and employment close to residences that serve a neighborhood’s daily needs, including access to food.

(Ord. No. 11-27, § 1, 4-20-11)

(c) (d) St. Paul, Minnesota, Code of Ordinances (Supp. No. 126)

Sec. 66.315. Intent, T4 ~~high density transit corridor~~ district.

The T4 traditional neighborhood district is intended to foster and support compact, pedestrian-oriented commercial, residential, civic, and institutional development of high density that, in turn, supports and increases transit usage. It encourages, but does not require, a variety of uses and housing types, with attention

to the amount and placement of parking. The T3 traditional neighborhood district is designed primarily for use near transit stops along fixed rail transit (including commuter rail, light rail and trolley) corridors, existing and neighborhood nodes.

MINOR CONCERN – “INTENSITY” VS “DENSITY”

The proposed update uses the term “density” 6 approximately 6 times, including (page 10 of 32):

(2) Transitions to lower-density neighborhoods. Transitions in density or intensity shall be managed through careful attention to building height, scale, massing and solar exposure.

[The proposed switch to “intensity” creates the apples to oranges switch of higher intensity to lower density.]

Your executive summary refers to a “density bonus”:

• **Incentives for Affordable Housing** (Section 66.331). The footnotes of the Density and Dimensional Standards Table are proposed to include a density bonus for affordable housing.

While we appreciate your willingness to challenge established norms in order to improve precision, we anticipate that the terms “intensity” and “density” will be used interchangeably, to the benefit of none, and the confusion of at least a few.

MINOR CONCERN – “COUTYARD BUILDING” VS “COURTYARD”

(page 7 of 32)

Rather than this:

Up to forty (40) percent of the building façade on any lot may exceed the maximum setback for courtyard buildings, cluster developments, or to create outdoor seating or gathering areas.

Consider this:

Up to forty (40) percent of the building façade on any lot may exceed the maximum setback for cluster developments, or to create an outdoor seating area, gathering area, or courtyard.



Abundant housing, low-carbon transportation, and sustainable land use

Sustain Saint Paul

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Our Mission

Sustain Saint Paul champions abundant housing, low-carbon transportation, and sustainable land use in the City of Saint Paul through education, advocacy and political action, to ensure a more just and equitable city for all current and future residents.

Wednesday, July 2nd, 2025

Dear Planning Commissioners,

We represent Sustain Saint Paul, a volunteer-driven advocacy organization that champions abundant housing, low-carbon transportation, and sustainable land use in the City of Saint Paul. We appreciate the opportunity to submit feedback about the proposed amendments to the Traditional Neighborhood zoning districts, and the specific Questions for the Community that you have published.

In short, we enthusiastically support all of the proposed updates to the Traditional Neighborhood zoning districts, and we would urge you and the City Council to initiate a study by the City of Saint Paul's Planning Department that would propose a large-scale rezoning of property into the T Districts across the city.

Below are our responses to your specific Questions for the Community:

1. Do you support additional development flexibility in T Districts, such as increasing building height by 10 feet in T2 and T3 districts? Why or why not? Yes, absolutely. The Planning Department's memo explains that the current requirement of a Conditional Use Permit and Public Hearing to obtain permission for additional height has been a significant impediment to development; allowing an additional ten feet by right is sensible.

2. Do you support simplified, objective design standards for T Districts? Why or why not? Yes. We feel that the proposed updates to the design standards will make them far simpler for prospective developers to follow, without significantly diminishing the required quality of design.

3. Do you support amendments to allow more neighborhood-scaled land uses in T Districts? Why or why not? Yes! Allowing a wider variety of neighborhood-scaled land uses is a positive change; it will enable the gradual development of small, local businesses and reduce administrative burden. This is one area where we would like to see even greater flexibility. For example, we feel that it would be reasonable to allow small restaurants and bars in the T1 district, not only in T2-T4. We also encourage you to consider consolidating the T1 district into the T2 district, so that parcels currently zoned T1 would become part of the T2 district. The dimensional standards of the districts are mostly identical (T2 allows slightly higher intensity for certain commercial uses), and so the primary effect of this change would be to allow a few more non-residential uses in the lowest-intensity district.

4. Do you support an amendment creating a density bonus for affordable housing? Why or why not? Yes. The T districts should have the same (or nearly same)

incentives for affordability that have been incorporated into the residential-only H and RM zoning districts. We trust that the details of these incentives have been calibrated to correspond with the current financial realities of land prices and development costs in Saint Paul, and that they will be updated in the future if and when those factors change.

5. Do you support amendments to allow outdoor gathering areas in front of buildings? Why or why not? Yes. These proposed amendments are a thoughtful strategy to cultivate vibrant, active streetscapes.

Next-Steps

Once the City of Saint Paul has adopted updates to the T Districts, we urge you to initiate a new zoning study that would put these zoning districts into widespread use throughout the City. During the public engagement sessions in May, Planning staff noted that most property owners who apply for rezonings seek to rezone their properties into the T Districts. This is no surprise, given the flexibility of their dimensional requirements and permitted land uses. Saint Paul needs to pursue every opportunity to catalyze neighborhood-scale economic development to build its tax base and build community wealth: rezoning more land into the T Districts is one such opportunity, because it reduces the number of barriers for Saint Paulites to create small-scale businesses within their neighborhoods in response to local needs.

Here are some ideas for what could be included in the scope of such a zoning study:

- Consolidating the Business zoning districts (B1-B5, OS) and the Vehicular Parking district into the Traditional Neighborhood districts (much as the old Residential Single-Family districts were consolidated into the H districts through the 1-4 Unit Housing Study in 2023)
- Rezoning land along arterial streets into the T districts (not only at the Neighborhood Nodes designated in the 2040 Comprehensive Plan)
- Rezoning parcels that once housed commercial spaces (e.g. along former streetcar routes) which are currently zoned in the H districts into the T districts
- Amending the H districts to allow a small number of small-scale commercial land uses (e.g. corner stores, Accessory Commercial Units) under certain conditions

Thank you once again for the invitation to comment, and thank you for taking on this process to modernize the T districts.

Sincerely,

Sustain Saint Paul Board of Directors

Thursday, July 10, 2025

Saint Anthony Park Community Council

Response to Planning Commission Questions on the Traditional Neighborhood District Zoning Study

Thank you for considering the Saint Anthony Park Community Council's response to the Planning Commission's call for community input on questions relating to the potential changes to Traditional Neighborhood (T) Zoning Districts.

The Community Council and its Land Use Committee have reviewed the recommended changes and have the following feedback to the Planning Commission's questions.

Do you support additional development flexibility in T Districts, such as increasing building height by 10 feet in T2 and T3 districts? Why or why not?

Yes. An additional story of height will allow for higher intensity developments. In Saint Anthony Park, T2 and T3 Districts are located around our commercial areas including Como Ave and University Ave. These areas are well suited to higher intensity development, including increased building height. We also support the proposed change to intensity requirements from units per acre to floor area ratio. Floor area ratio requirements will facilitate creative mixed-use developments in our commercial nodes.

Do you support simplified, objective design standards for T Districts? Why or why not?

Objective design standards ensure developers understand what requirements will apply to their development proposals. Simplified and objective design standards will improve St. Paul's ability to attract developments in T Districts. This is a welcome change and still leaves the opportunity for District Councils to advocate for their own set of design standards.

We oppose extending application of the building facade continuity standard to T1. It currently doesn't apply in T1 and adding it would make T1 design

standards less simple. One of the largest uses of T1 in the city is along Como Avenue in St. Anthony Park (including the Luther Seminary campus, a Lutheran Social Service office building, a large vacant site at Como and Eustis soon to be developed by Health Partners for a new clinic, a church, and our lovely public library), where this design standard just doesn't make sense.

Do you support amendments to allow more neighborhood-scaled land uses in T Districts? Why or why not?

Absolutely. Local businesses enliven Saint Anthony Park and create destinations throughout the neighborhood. T1 Districts in Saint Anthony Park are located along Como Ave where neighborhood-scaled land uses like local restaurants and shops already exist. Saint Anthony Park already has many 'general retail' businesses located in T2 Districts that are across the street from or share a border with T1 Districts. It just makes sense to expand flexibility of these uses, especially when the expansion is literally across the road in some cases.

Do you support an amendment creating a density bonus for affordable housing? Why or why not?

Yes. Developments that allow people with different economic circumstances to live in Saint Anthony Park should be given density bonuses, just as they would in other residential districts. The upcoming redevelopment of the Luther Seminary campus into residential use would be an ideal project to utilize this proposed density bonus for affordable housing.

We support the proposed density bonus, but would encourage the Planning Commission to consider a stricter affordability requirement. Zillow estimates the average rent in St. Paul at \$1,449. Rents affordable to households earning 60% of the area median income (AMI) according to the Metropolitan Council are higher than St. Paul's average rent.

<i>2025 Rental Housing</i>				
# Bedrooms	30% AMI	50% AMI	60% AMI	80% AMI
Efficiency	\$694	\$1,158	\$1,389	\$1,852
1 Bedroom	\$744	\$1,241	\$1,489	\$1,985
2 Bedrooms	\$894	\$1,490	\$1,788	\$2,384
3 Bedrooms	\$1,032	\$1,721	\$2,065	\$2,753
4 Bedroom	\$1,152	\$1,920	\$2,304	\$3,072

Developments seeking a density bonus should be providing units that are more affordable than St. Paul's average rent. We would advocate adjusting the amendment to require units affordable at the 50% or 30% AMI levels if developments seek the maximum floor area ratio increase.

Do you support amendments to allow outdoor gathering areas in front of buildings? Why or why not?

Yes. Neighborhood engagement at street level brings excitement and a sense of place. Saint Anthony Park has many businesses with outdoor gathering areas across the neighborhood and we encourage developers to include this type of street level activation in their proposals.

The proposed amendment to allow greater setback for just part of a building doesn't do enough to allow such spaces in front of buildings. Speedy Market at Como-Doswell and Milton Square at Como-Carter are examples of highly valued outdoor gathering areas along the entire frontage of the building; it works just fine. We don't see a need for a maximum setback requirement or examples of a problem it solves. Other T district standards prohibit parking in front of buildings. Property owners have a natural incentive to use their property efficiently and don't need to be forced to minimize front yard setbacks. Where there are greater setbacks, they tend to be used for landscaping and gathering areas that are desirable. It's good that civic and institutional buildings are exempt from maximum setback requirements (the public library at Como-Carter, St. Anthony Park Lutheran Church, and Luther Seminary are examples). But when use of the seminary changes and it is redeveloped, the maximum setback requirements may harm the valued public open space on the Como frontage of the seminary campus. Rather than complicated amendments to complicated unnecessary maximum front yard setback requirements, the maximum setback requirements should simply be eliminated.

Do you support providing design flexibility in master planned areas to achieve the vision adopted for the site? Why or why not?

Currently Saint Anthony Park does not have any districts with master plans. If a master planned area were created with robust community involvement and reflected the vision of the community, then we would support providing design flexibility in those areas.



July 9, 2025

Honorable Mayor Carter
Honorable Members of the Saint Paul City Council
390 City Hall
15 Kellogg Boulevard West
St. Paul, MN 55102

Honorable Mayor Carter, Honorable Members of the Saint Paul City Council, Staff,

The City of Saint Paul's Business Review Council respectfully submits this letter of support for proposed T-District amendment changes. The BRC recognizes the importance of added flexibility that the amendment changes will allow for business owners in Saint Paul especially additional neighborhood-scaled uses allowed, streamlined objective design standards, increased development flexibility at nodes and corridors and language changes that are both more accurate and allow for greater public understanding.

In particular, the BRC has identified the following changes that will remove unnecessarily burdensome requirements for both City administration and potential business owners:

- The consolidation of building types to a single category labeled "All other"
- FAR consolidation and replacement
- The increased maximum building height limits in both T2 and T3 areas.
- Removal of land use diversity design standard.
- Removal of transition to lower-density neighborhoods design standard.
- Removal of overly prescriptive standards of door and window openings.

The amendment changes identified and proposed in T-District neighborhoods align well with the charge of the BRC to reduce or simplify burdensome regulations, eliminate obsolete requirements and promote cooperation among various City enforcement agencies, businesses, and neighborhood groups. Thank you for your consideration of this letter.

Sincerely,

R Lynn Pingol, Chair
Business Review Council

1555 Branston Street

Saint Paul, MN 55108

14 July 2025

Kristine Grill, Chair

Saint Paul Planning Commission

1400 City Hall Annex

25 West Fourth Street

Saint Paul, MN 55102

RE: Comments on Traditional Neighborhood (T) District Zoning Study

Dear Commissioner Grill and Members of the Planning Commission:

Thanks for the opportunity to comment on the Traditional Neighborhood (T) district Zoning Study, including proposed amendments to T district standards and proposed amendments to other chapters of the Zoning Code related to T districts.

The updated and clarified T district intent language, simplified dimensional standards table, streamlined regulations, and amendments to provide additional development and design flexibility are all good amendments based on what has been learned and how T districts have been used since first adopted in 2004. More could be done to simplify and clarify T district code language, make it more objective, and provide additional development flexibility.

Maximum front yard setback requirements in section 66.331 unnecessarily complicate the code, unnecessarily limit development flexibility, and aren't right some situations. For the kind of pedestrian-oriented design desired in T districts, the key is not to allow parking in front of buildings; this is covered in sections 66.341 & 66.342. It's unnecessary to require smaller front yard setbacks because, where appropriate, developers will want to fully use the space. Patios, outdoor gathering areas, trees and green space along the entire front of buildings are generally seen as desirable. There is no good reason for overly prescriptive maximum front yard setback requirements to restrict such things. Dickerman Park is an example of providing even greater than normal space for such things in front of buildings; it provides welcome relief to hardscape along University Avenue that the community likes. The maximum setback requirements are so complicated it's necessary to say the minimum front setback can't exceed the maximum! Better than more complicated exceptions to allow outdoor gathering areas in front of buildings, simplify and streamline the regulations by deleting the maximum setback requirements.

In some places, "shall be" should be replaced with "is" rather than "must" as proposed in 66.331(a): the first line of 66.331(c/new b), the last sentence of 66.331(d/new c), and 66.344(b). "Must" seems correct in 66.614(b), better than "are" to make the point that outdoor restaurants can't be a stand-alone use.

In 66.342(a)(4), delete both parts of the parentheses.

The amendments to simplify the T district design standards, and to make them more objective, are generally good. Here are some additional suggestions to clarify the language.

In 66.343(b)(4/new 1), *Compatible rehabilitation and reuse*, simply delete the word *traditional*. It seems like a code word for something. What tradition? Who's tradition? It's so ambiguous it's sort of meaningless. Don't add the sentence about setback, which is covered elsewhere, doesn't define *traditional*, and is not the issue here. Don't add the phrase about human scale; it doesn't clarify what "traditional" buildings are. Don't add the word "visibility"; it's unclear and confusing in this context.

In 66.343(b)(8/new 3), *Building facade continuity*, start the first sentence with "In T2-T4, new buildings along" T1 was written and intended for broader use than the other T districts, including for locations and situations where requiring building facade continuity is not appropriate. Therefore, *Table 66.343, Applicability of Traditional Neighborhood Design District Standards* (now proposed to be deleted) does not apply the building facade continuity standard to the T1 district. T1 is a good district for civic, institutional and residential uses along commercial and mixed-use streets for which building facade continuity is not a good standard. T1 is a good district for corner commercial buildings along mixed use streets where requiring building facade continuity is not appropriate. With *Table 66.343, Applicability of Traditional Neighborhood Design District Standards* now proposed to be deleted, 66.343(b)(8/new 3), *Building facade continuity*, needs to be amended to be clear that it just applies in T2-T4, and does not apply in T1.

In 66.343(b)(14/new 8), *Building materials*, underline the new word "Building."

In 66.344(d), *Modification of traditional neighborhood design standards in master planned areas*, underline the (d), which is new. Remove the commas between "areas" & "when" and between "infrastructure" & "such" because they confuse and change the meaning of the sentence.

On page 17, move "ARTICLE I. 63.100. GENERAL PROVISIONS AND PERFORMANCE STANDARDS" to come before "Sec. 63.106. Projections into yards." "Sec. 60.104, Construction of language," does not fall under 63.100, but rather falls under "ARTICLE I. 60.100. GENERAL PROVISIONS AND EXCEPTIONS."

In 63.110(d), change the new language so that holding the corner just applies where existing buildings are within 15 feet of the public sidewalk as follows:

(d) ~~In pedestrian-oriented commercial districts characterized by storefront commercial buildings built up to the public sidewalk, new principal structures must have a maximum setback of fifteen (15) feet from a commercial lot line. At intersections, Where at least fifty (50) percent of the frontage of a block or corner is built up with existing buildings within fifteen (15) feet of the public sidewalk, a primary entrance must face the street, and on corner lots buildings must "hold the corner," that is ...~~

This appears to be the intent and makes sense. Without this change, the "holding the corner" standard would apply to all corner lots in the city, which I assume is not the intent.

In 65.130(b), simply add "floor area ratio" to the first sentence as follows:

- (b) *Zoning district standards.* Buildings must conform to the dimensional standards for floor area ratio, minimum lot area per unit, minimum lot width, height, and ...

The proposed new subparagraphs (1) and (2) under 65.130(b) are redundant and should be deleted.

Rewrite the proposed changes to Sec. 65.785 as follows:

Sec. 65.785. Storage facility, ~~rental~~ mixed use.

Rental storage within a mixed-use building.

Standards and conditions in ~~B4 B5~~ business districts.

- (a) The facility ~~shall be located within a mixed-use building, shall~~ must not exceed fifteen (15) percent of the ~~gross~~ floor area of the building and ~~shall~~ must not be located on the first floor (except for access) or a skyway level.
- (b) The storage facility's primary entrance, loading area, and freight elevators must not be located within the front third of the building, and may not be shared with other uses.
- (c) The floor to ceiling height within the storage facility must be a minimum of nine (9) feet.

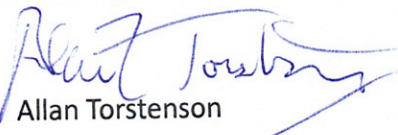
American Planning Association standards and conventions for zoning code definitions state that definitions should not include substantive regulatory provisions. The requirements that the use must not exceed fifteen (15) percent of the floor area of the building and not be located on the first floor belong in the standards and conditions for the use, not in the definition.

In Sec. 69.507(b), *Block length*, start the sentence as follows:

- (b) *Block length.* In residential, traditional neighborhood, and business districts, ~~The lengths, widths, and shapes of blocks shall be as are appropriate for the ...~~

Requiring 330' – 660' block lengths doesn't make sense for industrial districts, and industrial block length requirements are covered in 69.507(d).

Sincerely,


Allan Torstenson

allan.torstenson@gmail.com

651-307-8393

Good evening Spencer,

Here is my comment. My name for the record is Benjamin Werner. If you need my address, it is 431 Classon Ave, Brooklyn, NY 11238.

"In regards to all proposed guiding questions my comment is the following. Any changes that allow for increased density, more walkability, more vibrancy, and less environmental impact are changes I support. Activating our commercial corridors through mixed use zoning is low hanging fruit in the fight for exciting, healthy cities where people can connect and where democracy thrives. I love the idea of promoting outdoor gathering spaces, density bonuses for affordable housing, and any other amendment that simplifies this process and encourages in-fill development on commercial corridors.

The only changes I would make are that I think the zoning districts could be expanded. The entire length of west 7th, all of Payne avenue, the full length of Dale, and Selby avenues should be included. Basically, if it can be a commercial corridor or already is, let's densify it and make it more livable, walkable and fun. Increasing our population through simplifying the T District Zoning will help increase our tax base and make our city more vibrant. If T4 allows the most dense use, I'd propose to change all districts to T4 as of right zoning. I support all amendments. Thank you."

Ben

Dear Mr. Miller,

I am a Saint Paul resident and condo owner at 350 St. Peter Street, writing to express approval for the city studying changes that align T-Districts with the 2040 comprehensive plan. In fact, I would like to see the city go further by studying a wider implementation of T-Districts to all current and future transit corridors. Furthermore, I would like to see the city fold T1 districts into T2 districts, which I believe have a superior set of permitted uses and standards. Thank you for your service to the City of Saint Paul.

Sincerely,

Matt Frank

Dear Planning Commissioners,

I'm writing to express my enthusiastic support for the proposed updates to the Traditional Neighborhood zoning districts. I am particularly supportive of increasing the by-right height limits, to reduce the number of instances that development is delayed by CUP processes; and the expanded number of permitted land uses.

I also want to urge you to initiate another zoning study focused on broadly expanding the T Districts throughout Saint Paul. I suggest three concepts to be included within the scope of the study:

- Simplifying the Zoning Code by sunseting the Business districts and the Vehicular Parking district (perhaps consolidating them into the T Districts)
- Identifying formerly commercial buildings that are currently zoned in the H Districts and rezoning them into T Districts (to re-enable commercial uses in the future)
- Adding language to the H Districts that would enable small-scale commercial land uses within them (e.g. corner stores and Accessory Commercial Units) under certain conditions

Thanks for the invitation to comment, and thank you for your good work to modernize our Zoning Code.

Luke Hanson
1423 Eleanor Avenue

P.S. I forgot one additional idea to include within the scope of the study (perhaps the most straightforward one): rezoning land along arterial streets in Saint Paul into the T Districts.
Thanks.

Hello Planning Commissioners,

I am a Saint Paul resident at 238 Dale Street North, writing to express approval for the city studying changes that align T-Districts with the 2040 comprehensive plan. In fact, I would like to see the city go further by studying a wider implementation of T-Districts to all current and future transit corridors. Furthermore, I would like to see the city fold T1 districts into T2 districts, which I believe have a superior set of permitted uses and standards. Thank you for your service to the City of Saint Paul.

-Emmet Chappelle

Hello Planning Commissioners,

I am a Saint Paul resident at 890 Kenneth St. in Highland Park, writing to express approval for the city studying changes that align T-Districts with the 2040 comprehensive plan. In fact, I would like to see the city go further by studying a wider implementation of T-Districts to all current and future transit corridors. Furthermore, I would like to see the city fold T1 districts into T2 districts, which I believe have a superior set of permitted uses and standards. Thank you for your service to the City of Saint Paul.

Sincerely,
Jenn

Hello Planning Commissioners,

I am a Saint Paul resident at 1458 Arona St Saint Paul, writing to express approval for the city studying changes that align T-Districts with the 2040 comprehensive plan. In fact, I would like to see the city go further by studying a wider implementation of T-Districts to all current and future transit corridors. Furthermore, I would like to see the city fold T1 districts into T2 districts, which I believe have a superior set of permitted uses and standards.

Thank you for your service to the City of Saint Paul.

Matthew Belanger

Hello Planning Commissioners,

I am a Saint Paul resident at 695 Fuller Ave., writing to express approval for the city studying changes that align T-Districts with the 2040 comprehensive plan. In fact, I would like to see the city go further by studying a wider implementation of T-Districts to all current and future transit corridors. Furthermore, I would like to see the city fold T1 districts into T2 districts, which I believe have a superior set of permitted uses and standards. Thank you for your service to the City of Saint Paul.

Thanks,

- Lincoln Wells

Hello Planning Commissioners,

I am a St .Paul resident from the West 7th neighborhood. After spending time in Europe this summer, marveling at their community-centered, walkable cities, I am happy to be writing to express my approval for the city studying changes that align T-Districts with the 2040 comprehensive plan.

I would also encourage the city to go a step beyond by studying a wider implementation of T-Districts to all current and future transit corridors. I am also in support of the city folding T1 districts into T2 districts, whose more expansive permitted uses and standards would help facilitate accessible community spaces that make for a more walkable, sustainable, and connected community.

Thank you for your service to the City of Saint Paul!

Best,

Barb Thees

232 Goodrich Ave, St Paul, MN 55102

Hello Planning Commissioners,

I am a Saint Paul resident at 2001 Selby Ave, writing to express approval for the city studying changes that align T-Districts with the 2040 comprehensive plan. In fact, I would like to see the city go further by studying a wider implementation of T-Districts to all current and future transit corridors. Furthermore, I would like to see the city fold T1 districts into T2 districts, which I believe have a superior set of permitted uses and standards. Thank you for your service to the City of Saint Paul.

Best,

Henry Parker
2001 Selby Ave
St Paul, MN 55104

Hello Planning Commissioners,

I am a Saint Paul resident at 808 Berry St, Apt 407, writing to express approval for the city studying changes that align T-Districts with the 2040 comprehensive plan. In fact, I would like to see the city go further by studying a wider implementation of T-Districts to all current and future transit corridors. Furthermore, I would like to see the city fold T1 districts into T2 districts, which I believe have a superior set of permitted uses and standards. Thank you for your service to the City of Saint Paul.

Noah Schneider

Hello Planning Commissioners,

I am a Saint Paul resident at 195 Cleveland Ave S, writing to express approval for the city studying changes that align T-Districts with the 2040 comprehensive plan. In fact, I would like to see the city go further by studying a wider implementation of T-Districts to all current and future transit corridors.

Furthermore, I would like to see the city fold T1 districts into T2 districts, which I believe have a superior set of permitted uses and standards. I am especially in favor of any city planning that increases safety for pedestrians and cyclists, and encourages business growth and housing density along existing transit routes and nodes. Thank you for your service to the City of Saint Paul.

Sincerely,

Rachel Willson-Broyles

Dear Mr. Johnson,

I support the proposal that density bonuses in T-zoned districts be given ONLY when tied to affordability. I also request that the Planning Commission and the City Council enact those same rules for density bonuses in RL1, H1 and H2 zoning districts. I further request that the Student Housing Overlay District be updated with the new housing unit types allowed in those districts. Thank you in advance for your consideration. Chris Schirber

Hello Planning Commissioners,

I am a Saint Paul resident and small business owner. I live in Mac Groveland and have my business in the Creative Enterprise Zone. I enthusiastically support the zoning amendments proposed by City staff in the recent Traditional Neighborhood district zoning study: the proposed updates are sensible ways to make the T districts more functional. One reason we were able to get traction in forming the CEZ is because of the strength of the small commercial district on Raymond. It has contributed to a thriving mixed-use community. I would love to have more small businesses near my home (Cretin and St. Clair). We have longed for a coffee shop or bakery on our near corner.

I have two suggestions:

1. Consider folding the T1 district into the T2 district, which I believe has a superior set of permitted uses and standards.

2. I would like to see the Traditional Neighborhood zoning districts applied more broadly across the City, along current and future transit corridors and arterial streets. Please initiate a second zoning study that would propose more T zoning throughout Saint Paul.

Thank you for your service to the City of Saint Paul.

Catherine Reid Day

Hello Planning Commissioners,

*I am a Saint Paul resident at **1383 Charles Ave, 55104**. I enthusiastically support the zoning amendments proposed by City staff in the recent Traditional Neighborhood district zoning study: the proposed updates are sensible ways to make the T districts more functional. I have two suggestions:*

1. Consider folding the T1 district into the T2 district, which I believe has a superior set of permitted uses and standards.

2. I would like to see the Traditional Neighborhood zoning districts applied more broadly across the City, especially along current and future transit corridors and arterial streets. Please initiate a second zoning study that would propose more T zoning throughout Saint Paul.

Thank you for your service to the City of Saint Paul.

Daniel Phillips

Hello,

I'm a homeowner in the Macalester-Groveland Neighborhood.

- I'm writing to convey my support for the proposal that density bonuses in T-zoned districts be given ONLY when tied to affordability.
- I also request that the Planning Commission and the City Council enact those same rules for density bonuses in RL1, H1 and H2 zoning districts.
- I further request that the Student Housing Overlay District be updated with the new housing unit types allowed in those districts.

Thank you for your time and consideration.

Keren Ashie Whaley, MS, RN, FNP-C
2006 Lincoln Ave

Hello,

I'm a homeowner in the Macalester-Groveland Neighborhood.

- I'm writing to convey my support for the proposal that density bonuses in T-zoned districts be given ONLY when tied to affordability.
- I also request that the Planning Commission and the City Council enact those same rules for density bonuses in RL1, H1 and H2 zoning districts.
- I further request that the Student Housing Overlay District be updated with the new housing unit types allowed in those districts.

Thank you for your time and consideration.

Daniel Whaley, PE - State of Texas
2006 Lincoln Ave

Dear Spencer,

I am writing as a homeowner in the Macalester-Groveland neighborhood to express my support for the proposal requiring density bonuses in T-zoned districts to be tied exclusively to affordability requirements.

I respectfully request that the Planning Commission and City Council extend these same density bonus requirements to RL1, H1, and H2 zoning districts.

Additionally, I request that the Student Housing Overlay District be updated to incorporate the new housing unit types permitted in these districts.

Thank you for your time and consideration.

Sincerely,

Kelly Wilen

Hi Spenser,

I strongly support the proposal that density bonuses in T-zoned districts be granted **only** when they are directly tied to true affordability. Our neighborhoods deserve housing that serves the people who live and work here, not just developers' bottom lines. I urge the Planning Commission and the City Council to apply these same common-sense rules to RL1, H1, and H2 zoning districts as well.

Also, I would like to ask that the Student Housing Overlay District be promptly updated to reflect the new types of housing units now allowed in those areas. This is an important opportunity to align our policies with the evolving needs of our community.

Let's ensure growth in our city is thoughtful, equitable, and genuinely affordable for all. Thank you.

Thanks,
Justin Grammens
2030 Dayton Ave
Saint Paul, MN 55104

Dear Spencer,

I support the proposal that density bonuses in T-zoned districts be given ONLY when tied to affordability. I also request that the Planning Commission and the City Council enact those same rules for density bonuses in RL1, H1 and H2 zoning districts. I further request that the Student Housing Overlay District be updated with the new housing unit types allowed in those districts. Thank you.

Margaret Frank

1977 Lincoln Ave, St Paul, MN 55105

Hello,

I'm a homeowner in the Merriam Park Neighborhood.

- I'm writing to convey my support for the proposal that density bonuses in T-zoned districts be given ONLY when tied to affordability.

- I also request that the Planning Commission and the City Council enact those same rules for density bonuses in RL1, H1 and H2 zoning districts.

- I further request that the Student Housing Overlay District be updated with the new housing unit types allowed in those districts.

Thank you for your time and consideration,

Molly Tiedeman Brown

Hello,

As a homeowner in the Union Park neighborhood, I am writing to express my support for the proposal that density bonuses in T-zoned districts be granted only when tied to affordability.

I also request that the Planning Commission and City Council apply this same rule for density bonuses in the RL1, H1, and H2 zoning districts.

Additionally, I request that the Student Housing Overlay District be updated to include the new housing unit types now permitted in those districts.

Thank you for your time and consideration. Please let me know if you have any questions or additional information I may provide.

John Pyle

Good afternoon,

I am writing to voice my support for the changes to T zoning. I believe we should continue to improve density along transportation hubs and, if anything, don't think the expansions go far enough. Thank you for your work to ensure St. Paul can continue to be a growing city and one that hopefully can be affordable for more people to enjoy in the future.

Best,

Casey Ulrich
1723 Field Ave

I support the proposal that density bonuses in T-zoned districts be given ONLY when tied to affordability. I also request that the Planning Commission and the City Council enact those same rules for density bonuses in RL1, H1 and H2 zoning districts. I further request that the Student Housing Overlay District be updated with the new housing unit types allowed in those districts.

Thank you.

Kathy Brudevold

2208 Sargent Ave

Spencer-

Thank you for returning my call. I will not be able to attend the Planning Commission meeting on July 11, 2025 at 8:30 am. I would like to give you what I would have said at the meeting.

This issue that I have with the T1,2,3,4 and the H1,2 zoning changes is that the developers have too much power over the residents in the neighborhoods where they want to make things "more " dense. I am opposed allowing a developer to tear down 2 single dwelling homes in order to build 4-6 story buildings. Would you want a 4 story, 24 unit next to your home? This is the kind of building St Paul does not need. Residents are not notified until after the fact. This is not how to treat your long-term residents.

It saddens me to watch my neighborhood change from single dwelling homes to four and 6 story apartment buildings, one right after another. These are not neighborhoods - these are asphalt jungles.

I hope the city can recognize that the long-term residents are being "kicked out" of their homes because of high taxes. The goal of more density is not the answer to the revenue question. Cutting your spending is the answer.

Thank you for allowing my response on these issues.

Sincerely,

KC Cox
Carroll Ave

Hi Spencer,

I live in Ward 4 and am writing to express my strong support for expanding T Districts. Doing so will help my neighborhood become more walkable, with more of our daily needs reachable on foot or by bike. Strict zoning separations between residential and commercial uses are an anachronism that are standing in the way of real progress in making St. Paul more livable and in pushing down our total vehicle miles traveled (by car, that is.)

Thank you—

Mark Thieroff

Hello Planning Commissioners,

I am a Saint Paul resident at 811 Como Ave Apt 8. I enthusiastically support the zoning amendments proposed by City staff in the recent Traditional Neighborhood district zoning study: the proposed updates are sensible ways to make the T districts more functional. I have two suggestions:

1. Consider folding the T1 district into the T2 district, which I believe has a superior set of permitted uses and standards.
2. I would like to see the Traditional Neighborhood zoning districts applied more broadly across the City, along current and future transit corridors and arterial streets. Please initiate a second zoning study that would propose more T zoning throughout Saint Paul.

I support the statement released by Sustain Saint Paul, attached.

Thank you for your service to the City of Saint Paul.

Jacob Hooper

Hello Planning Commissioners,

I am a Saint Paul resident at 337 7th St W. I enthusiastically support the zoning amendments proposed by City staff in the recent Traditional Neighborhood district zoning study: the proposed updates are sensible ways to make the T districts more functional. I have two suggestions:

1. Consider folding the T1 district into the T2 district, which I believe has a superior set of permitted uses and standards.
2. I would like to see the Traditional Neighborhood zoning districts applied more broadly across the City, along current and future transit corridors and arterial streets. Please initiate a second zoning study that would propose more T zoning throughout Saint Paul.

Thank you for your service to the City of Saint Paul.

Braden Holmes
Cabinetmaker
St. Paul, MN
5073639021
bradenholmes33@gmail.com

Hello Planning Commissioners,

*I am a Saint Paul resident at **958 Hatch Ave**. I enthusiastically support the zoning amendments proposed by City staff in the recent Traditional Neighborhood district zoning study: the proposed updates are sensible ways to make the T districts more functional. I have two suggestions:*

1. Consider folding the T1 district into the T2 district, which I believe has a superior set of permitted uses and standards. As an artist who would like to be able to have a small retail store front on Front Ave and a small workspace this zoning would allow.

2. I would like to see the Traditional Neighborhood zoning districts applied more broadly across the City, along current and future transit corridors and arterial streets. Please initiate a second zoning study that would propose more T zoning throughout Saint Paul. As an artist who would love to be able to have a small retail store on Front Ave and a small workspace this zoning would allow. Even if this was only applied to larger/higher volume streets so the neighbor hoods were still all residential. These changes would drastically improve the opportunities for future business and community vibrancy!

Thank you for your service to the City of Saint Paul.

Carl Fristad

Hello Planning Commissioners,

I am a Saint Paul resident at 2183 Scheffer Ave. I enthusiastically support the zoning amendments proposed by City staff in the recent Traditional Neighborhood district zoning study: the proposed updates are sensible ways to make the T districts more functional. I have two suggestions:

1. Consider folding the T1 district into the T2 district, which I believe has a superior set of permitted uses and standards.
2. I would like to see the Traditional Neighborhood zoning districts applied more broadly across the City, along current and future transit corridors and arterial streets. Please initiate a second zoning study that would propose more T zoning throughout Saint Paul.

Thank you for your service to the City of Saint Paul.

Philip Breczinski

Hello Planning Commissioners,

I am a Saint Paul resident at **(1597 Chelsea St)**, writing to express approval for the city studying changes that align T-Districts with the 2040 comprehensive plan. I currently have one coffee shop in my neighborhood and it used to be a daycare. I would love to have multiple buildings that can be allocated so we can have both at one time. In fact, I would like to see the city go further by studying a wider implementation of T-Districts to all current and future transit corridors. Furthermore, I would like to see the city fold T1 districts into T2 districts, which I believe have a superior set of permitted uses and standards. Thank you for your service to the City of Saint Paul.

Sigrid O

Hello Planning Commissioners,

I am writing to express my support for the recent zoning amendments proposed in the traditional neighborhood district (T-district) zoning study. I chose to reside in Saint Paul due to the walkability of my neighborhood, and I believe that every resident should be able to walk to a variety of small, local businesses.

Therefore, I would suggest that the Traditional Neighborhood zoning districts are applied in more locations across the City, including along current and future transit corridors and arterial streets.

Secondly upon review of the zoning study, I would recommend that the T1 district designation should be phased out in favor of the current T2 standards, which provide a higher degree of flexibility to entrepreneurs.

Thank you for your consideration.

John Scalise

924 Ighehart Ave, Saint Paul

Dear Planning Commission members,

I do a lot of walking in Saint Paul, especially in the Frogtown and Summit-University neighborhoods, and I am always intrigued by buildings, often on corners, that clearly once were small businesses - grocers, cafes, - that are no longer. I would love to see a return to more mixed uses in our residential neighborhoods. I've had the great fortune of traveling in Japan, where I see a very healthy mix of uses side by side - small rice paddies and vegetable gardens, homes, businesses, small shrines, schools - all in the suburb where my brother lives.

I am in favor of the city studying changes that align T-Districts with the 2040 comprehensive plan and studying a wider implementation of T-Districts to all current and future transit corridors. I think they would increase the vibrancy of our city and create more places where neighbors can get to know each other.

Thank you for considering these options.

Jeanne Landkamer
954 Aurora Ave.
St. Paul, MN 55104

Hello Planning Commissioners,

My wife Ofelia and I own IO Investments LLC, which owns a small Saint Paul commercial building at 1053 Dale St. N. This is where we operate [www.coffeeinlaw.com]Abogados Café, the first Latina-owned coffee shop in the Twin Cities.

I enthusiastically support the zoning amendments proposed by City staff in the recent Traditional Neighborhood district zoning study: the proposed updates are sensible ways to make the T districts more functional. I have two suggestions:

1. Consider folding the T1 district into the T2 district, which I believe has a superior set of permitted uses and standards.
2. I would like to see the Traditional Neighborhood zoning districts applied more broadly across the City, along current and future transit corridors and arterial streets. Please initiate a second zoning study that would propose more T zoning throughout Saint Paul.

When Ofelia and I rezoned the building to T2 we got some help and guidance from city staff. However, the process was grueling and confusing. Language and standards from the 1900s made it all difficult to navigate. The process took about six months. For a business owner, that is way too long of a process.

I want a city where opening and operating a business is seamless and affordable. Currently, it is neither. As a business lawyer, I help business owners open shop all over Minnesota. Let me tell you a non-secret, the city of St. Paul is the toughest to enter and remain. My clients are not rushing to do business here. They only set up shop here if they must. Construction contractors automatically turn down projects when they hear "Saint Paul." It's not looking good.

St. Paul is dying. The census shows a decline in population. At this rate, our beloved capital city will be a ghost town in a few decades. The silverlining is that it could attract tourists to walk around the St. Paul of yore. But let's not get there.

This dying grandpa is on life support. Yet he's not that old--he's only been fed the wrong things, with minimal exercise, and poor sleep. Our city tends to follow very lofty and well-intended policies that are impractical and harmful. It appears our leaders care primarily about the good intentions of their policies, while ignoring their terrible results. There are a lot of egos within city

governance. Pet projects are prioritized over the wellbeing of the city as a whole. Leaders don't want to wake up and smell the coffee. Nevertheless, "I meant well" is not enough.

So here we are, with a dying city that can only be revitalized with common sense policies that foster business growth while taking the marginalized into account. This is not rocket science. Other cities have figured it out and are thriving.

Thank you for your service to the City of Saint Paul.

Sincerely,

Inti Martínez-Alemán
IO Investments LLC

1053 Dale St. N, Suite 202

Saint Paul, MN 55117

651-317-4895
ioinvestmentsmn@gmail.com

Hello Planning Commissioners,

I am a Saint Paul resident at (1800 Graham Ave, Saint Paul MN 55116), writing to express approval for the city studying changes that align T-Districts with the 2040 comprehensive plan. In fact, I would like to see the city go further by studying a wider implementation of T-Districts to all current and future transit corridors. Furthermore, I would like to see the city fold T1 districts into T2 districts, which I believe have a superior set of permitted uses and standards. Thank you for your service to the City of Saint Paul.

Courtney Peterson

Hello!

My name is Christopher Woxland, a born and raised St. Paulite currently living at 1515 Marshall Ave. I'm writing to voice my approval for future implementations of T districts throughout the city. Further I want to express my desire for the city to legalize accessory commercial units and corner stores in residential zoning districts. Both actions would allow the city to continue its mission to become a more sustainable and equitable city by providing walkable neighborhoods for all residents in the city. Not just those near transit lines or arterial streets.

Having grown up at 1999 Itasca Ave, I know first hand the disadvantages of living in a neighborhood surrounded with exclusively H1 zoning. This meant growing up to get to any coffee shops, grocers, restaurants, and other neighborhood gathering places. I (along with all my neighbors in this area) would have to walk at least a mile to either get to the Village or the W7th plaza. We are one of many neighborhoods in St. Paul where there is a dearth of walkable neighborhood shops.

This is why I had left St. Paul to go to college and stayed for a few years after as even predominantly residential neighborhoods would have coffee shops, bars, restaurants and other small businesses dotted throughout allowing one to be able to live in the neighborhood without a car. Thankfully when I decided to move back home I found a neighborhood that is off multiple transit lines and has allowed for not only T style development but other walkable infrastructure as well. Being able to allow coffee shops or other small neighborhood stores (like Talisman) on street corners throughout the city and not just in those areas will greatly improve the quality of life for the city's residents.

Thank you,
Christopher

I am a Saint Paul resident at 1768 Englewood Ave, writing to express approval for the city studying changes that align T-Districts with the 2040 comprehensive plan. In fact, I would like to see the city go further by studying a wider implementation of T-Districts to all current and future transit corridors. Furthermore, I would like to see the city fold T1 districts into T2 districts, which I believe have a superior set of permitted uses and standards.

Thank you for your service to the City of Saint Paul.

Bobby Wargo

I am a Saint Paul resident at 978 Barrett, writing to express approval for the city studying changes that align T-Districts with the 2040 comprehensive plan. In fact, I would like to see the city go further by studying a wider implementation of T-Districts to all current and future transit corridors. Furthermore, I would like to see the city fold T1 districts into T2 districts, which I believe have a superior set of permitted uses and standards. Thank you for your service to the City of Saint Paul.

Matt Schneider

South Como Community Investment Cooperative

secretary@southcomocoop.org | southcomocoop.org

Dear Mr. Miller-Johnson,

I'm a homeowner in St. Paul's Shadow Falls neighborhood. I'm concerned about degradation of our neighborhood from the proliferation of closely-spaced, dormitory-style student housing structures, and the resulting increase in noise, litter, parking issues, vehicular and pedestrian traffic, and vehicle-pedestrian and vehicle-cyclist conflicts, and worsened visual appeal and sense of neighborhood cohesion.

- I'm writing to convey my support the proposal that density bonuses in T-zoned districts be given ONLY when tied to affordability.

- I also request that the Planning Commission and the City Council enact those same rules for density bonuses in RL1, H1 and H2 zoning districts.

- I further request that the Student Housing Overlay District be updated with the new housing unit types allowed in those districts.

Respectfully,

James Johnson

jjohns007@icloud.com

2224 Dayton Ave, St. Paul, MN 55104

Hello Planning Commissioners,

I am a longtime Saint Paul resident at 935 Linwood Ave. I enthusiastically support the zoning amendments proposed by City staff in the recent Traditional Neighborhood district zoning study: the proposed updates are sensible ways to make the T districts more functional. I have two suggestions:

- 1. Consider folding the T1 district into the T2 district, which I believe has a superior set of permitted uses and standards.*
- 2. I would like to see the Traditional Neighborhood zoning districts applied more broadly across the City, along current and future transit corridors and arterial streets. Please initiate a second zoning study that would propose more T zoning throughout Saint Paul.*

It would be wonderful to have many more vibrant neighborhood shopping nodes available like we currently see in our sister city, Minneapolis.

Thank you for your consideration,

Kimberly Feilmeyer

Hello Planning Commissioners,

*I am a Saint Paul resident at **(1446 Cumberland St. St. Paul, MN 55117)**. I enthusiastically support the zoning amendments proposed by City staff in the recent Traditional Neighborhood district zoning study: the proposed updates are sensible ways to make the T districts more functional. I have two suggestions:*

1. Consider folding the T1 district into the T2 district, which I believe has a superior set of permitted uses and standards.

2. I would like to see the Traditional Neighborhood zoning districts applied more broadly across the City, along current and future transit corridors and arterial streets. Please initiate a second zoning study that would propose more T zoning throughout Saint Paul.

We would love to find ways to support local entrepreneurs and small businesses in our neighborhoods. Thank you for your service to the City of Saint Paul.

Sincerely, Gina Brewington

906-360-6107

Hello -

I am reaching out to express my support for the proposal that density bonuses in T-zoned districts be given **ONLY** when tied to affordability. I also strongly urge the Planning Commission and the City Council enact those same rules for density bonuses in RL1, H1 and H2 zoning districts. Further, I request that the Student Housing Overlay District be updated with the new housing unit types allowed in those districts.

I live in Merriam Park and we do not need more student housing! The buildings being put up in my neighborhood currently are large, configured for students, and are definitely not affordable. They do not fulfill the desire by the city for affordable housing and neighborhood diversity. They do not help to maintain a good balance between full-time residents of Merriam Park and the student population. The Student Housing Overlay was enacted to maintain a balance between a livable neighborhood and a college campus. The current situation is not maintaining that balance and could drive down housing costs and cause people to move away.

Thank you.
Naomi Shapiro