**AN EQUITY GUIDE FOR COMPREHENSIVE PLAN CONSISTENCY IN ZONING APPLICATIONS**

Staff Draft - February 5, 2020

Comprehensive Plan consistency is required for approval of a conditional use permit, site plan, variance, nonconforming use permit, similar use determination, master plan, or Zoning Code amendment/rezoning. ***How* your application meets this requirement must be addressed in your zoning application**. Zoning application decisions must not conflict with the Comprehensive Plan.

**Equity Principle of the Saint Paul 2040 Comprehensive Plan**

The Comprehensive Plan includes the following principle related to racial and social equity:

*How we grow, develop and invest over the next 20 years must be done in a way that reduces racial and social disparities in jobs, income, housing cost burden, education and homeownership.*

Below is list of questions including Comprehensive Plan goals and policies that commonly pertain to zoning applications. Many of these items relate to racial and social equity. Some of them may not specifically apply to an individual zoning application. If you have questions, please consult City staff.

**Community Engagement**

Community engagement practices involve the local community members most affected by a development project. Please answer the questions below about your project:

□ How did you engage the community – via the District Council and/or other local community organizations and residents – in advance of submitting your zoning application?

□ How does your project respond to comments received from the relevant District Council and/or other community-based advisory committees?

□ How does your project respond to adopted [neighborhood plans](https://www.stpaul.gov/departments/planning-economic-development/planning/neighborhood-plans) for the area/site? (URL: <https://www.stpaul.gov/departments/planning-economic-development/planning/neighborhood-plans>)

**2040 Comprehensive Plan Policies & Goals**

To assist review of your zoning application, please explain how your proposed business or development project would support applicable Comprehensive Plan goals and policies:

**Land Use Plan Policies**

□ Is your project located in a Metropolitan Council-defined Area of Concentrated Poverty where 50% or more of the residents are people of color? ([ACP50s map](https://stpaul.maps.arcgis.com/apps/webappviewer/index.html?id=6c989e5a89a2441787fcca0130b87001), located at URL: <https://stpaul.maps.arcgis.com/apps/webappviewer/index.html?id=6c989e5a89a2441787fcca0130b87001>)

□ Does the project provide transit-supportive density in an area of high existing or planned transit capacity? (Policy LU-1. *See 2040 Comprehensive Plan Figure LU-5*, which calls for 50+ units/acre within 1/2 mile of Light Rail Transit, 25+ units/acre within 1/2 mile of Bus Rapid Transit, 15+ units/acre within 1/4 mile of Arterial Bus Rapid Transit, and 10+ units/acre within 1/4 mile of High-Frequency Transit.)

□ Does the project invest in measures that minimize displacement in neighborhoods where the proximity to high-frequency transit has increased redevelopment pressure and/or housing costs? (Policy LU-4)

□ Does the project provide flexible building design to ensure ongoing functionality and viability, and to respond to new market conditions? (Policy LU-5)

□ Does the business or development project facilitate business creation, attraction, retention or expansion? Help retain or create quality full-time construction and/or permanent jobs? Help grow Saint Paul’s tax base in order to maintain and expand City services, amenities and infrastructure? (Policies LU-6 and LU-45)

□ Does the project support environmentally and economically efficient, resilient land use development? (Policy LU-8)

□ Is the design of the project pedestrian-friendly? Does it support a healthy environment, enhance the public realm, and activate the streetscape? (Policies LU-9 & LU-10)

□ Does the development project reduce the amount of land devoted to off-street parking in order to use land more efficiently, accommodate increases in density on valuable urban land, and promote the use of transit and other non-car mobility modes? (Policy LU-14)

□ Does the proposed or expanded business or development project help enable people in the community to meet their daily needs within walking distance by providing support or additional access to needed or missing amenities, retail, and/or community services? (Policy LU-31)

□ Does the zoning action help provide for medium-density housing that diversifies housing options in the neighborhood *(generally defined as a fourplex up to a 4-story building)* ? (LU-34)

**Parks and Recreation Plan Policy**

□ Does the project create (and will it maintain) privately-owned public space (POPS) and green infrastructure, especially as land use intensity and activity levels increase? (Policy PR-31)

**Housing Plan Goals & Policies**

□ Does the project further general goals for strong neighborhoods that support lifelong housing needs; decent, safe and healthy housing for all city residents; and improved access to affordable housing? (Goals 1, 6 & 7)

□ Does the development project increase housing choice and locational choices for residents of all income levels to support economically diverse neighborhoods? (Policy H-16)

□ Does the project include development of family-sized affordable housing in a strong market area? (Policy H-36)

□ Does the project improve the stability and health of communities of concentrated disadvantage by implementing place-based investments, such as public infrastructure, improvements and maintenance? (Policy H-56)

**Heritage and Cultural Preservation Plan Policies**

□ Does the project further preservation of built, cultural and natural environments that express the identity and sense of place of Saint Paul? (Goal 2)

□ Does the project prioritize the recognition of historically underrepresented communities and their histories? (Policy HP-19)

**Additional Resource for Zoning Applicants**

*While it is not required that you respond to this in your zoning application*, the [Twin Cities Equitable Development Scorecard](http://thealliancetc.org/wp-content/uploads/2016/06/EquitableDevelopmentScorecard.pdf) is an additional resource that offers five principles of equitable development that may be useful dimensions to consider in developing your response to the above questions:

* **Community Engagement** practices involve the local community members most affected in the development
* **Equitable Land Use** practices require … the overall vision, plan, and implementation *includes* local communities’ assets, aspirations, potential, and preferences
* **Equitable Housing** practices give families of all income levels access to housing that costs no more than 30% of their income
* **Equitable Economic Development** practices … work to prioritize community based financial intelligence, sustainable wealth creation, and high-quality job opportunities
* **Equitable Transportation** practicesintegrate transit into walkable, livable, and affordable land use practices

**Not included items:**

* Does the development project **add new or preserve existing affordable housing** to the area (as defined by the *2040 Comprehensive Plan*)? Note:
* Policy H-32 of the Comp Plan supports **30** percent of the total **rental housing units** created across the city as affordable to households earning **60 percent or less of the Area Median Income** (AMI) with at least:
	+ 10 percent of all units being affordable to households earning 30 percent of AMI;
	+ 10 percent of all units being affordable to households earning 50 percent of AMI; and
	+ 10 percent of all units being affordable to households earning 60 percent of AMI?
* Policy H-33 of the Comp Plan supports **30** percent of the total **ownership housing units** created across the city as affordable to households earning 80 percent or less of the AMI, with at least:
	+ 10 percent of all units being affordable to households earning 60 percent of AMI; and
	+ 20 percent of all units being affordable to households earning 80 percent of AMI?

***Staff rationale for not including:*** Already included are policies about increased housing choice and locational choices for residents of all income levels (Policy H-16), and family-sized affordable housing in a strong market area (Policy H-36); in addition, policies H-32 and H-33 are specifically policy goals for City/HRA-financed housing projects, projects that may rarely be the subject of Planning Commission review. Last, Planning and Housing staff have begun work on an Inclusionary Zoning Study, and that will likely be a reason to update these guidelines (Housing Goals & Policies) once that is in place.

**Plan for how this document will be provided to zoning applicants**

* On PED website where zoning application materials live
* Provided in-person to zoning applicants that visit the 14th floor zoning counter