

**ZONING APPLICATION WORKSHEET TO ADDRESS EQUITY AND
COMPREHENSIVE PLAN CONSISTENCY: For Zoning Applicants**

Staff Draft #2 – August 25, 2020 (last considered by Zoning Committee on 2/13/2020)

The Saint Paul Zoning Code requires that applications for site plan review, variances, nonconforming use permits, and similar use determinations must be consistent with the City Comprehensive Plan in order to be approved. Approval of a conditional use permit application requires that the extent, location, and intensity of the conditional use will be in substantial compliance with the Comprehensive Plan. Minnesota law prohibits rezoning land in conflict with the City Comprehensive Plan. **Your application should address these requirements.**

The introduction to **Saint Paul’s 2040 Comprehensive Plan** includes the following statement about 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.”*

Zoning applications can show how they help to achieve City equity goals by answering the questions contained in this worksheet. Some of them may not specifically apply to an individual zoning application. **Please consult City staff with questions.**

Community Engagement practices involve the local community members most affected by a development project, specifically residents and local community organizations including but not limited to district councils. Please explain **how you engaged the community** with your proposed project:

Community engagement questions	Describe how your project addresses the question(s) below
Did you meet with members of the community in advance of submitting your zoning application?	Yes/No and if yes, with whom did you meet?
<p>How does your project respond to comments received from the community?</p> <p>Note: Best practice is for your project to respond to adopted neighborhood plans for the area/site (URL: https://www.stpaul.gov/departments/planning-economic-development/planning/neighborhood-plans) Consult with the City’s neighborhood planner for the district where your project is located if you have any questions. Paul Dubruiel can identify this planner, at 651-266-6583 or paul.dubruiel@ci.stpaul.mn.us</p>	

2040 Comprehensive Plan Policies & Goals

To assist review of your zoning application, please **explain how your proposed business or development project** would support the following City goals and policies:

City policy goal	If relevant, describe how your project addresses this policy goal.
Land Use, Business and Economic Development	
<p>Help existing residents and/or businesses in the neighborhood or community?</p> <p><i>Examples include additional/affordable housing, space for local businesses or community groups, quality jobs for local residents, and/or other community benefits.</i></p>	List ways your project would help existing residents and/or businesses in the neighborhood or community

<p>Help community residents by providing more access within walking distance to needed amenities, retail and/or community services?</p>	<p>List retail, community services, and/or amenities provided</p>
<p>Keep or create quality full-time construction and/or permanent jobs for Saint Paul residents?</p>	<p>Specify number of construction jobs, and full-time permanent jobs retained and/or created</p>
<p>Housing Choices</p>	
<p>Increase or preserve housing choices at a price point that is currently limited within the City and/or market area where the project is located?</p>	<p>For projects including housing only: Specify the number of units included in the project, whether ownership or rental, and price range of housing</p> <p>Total number of units in project = _____</p> <p><input type="checkbox"/> For-sale housing units <input type="checkbox"/> Rental housing units</p> <p>Price range of housing (I.e. the range of fair market prices of for-sale homes, or monthly rents charged for rental units) = \$ _____ to \$ _____</p>
<p>Increase or preserve housing units affordable to households at various income thresholds? (<i>see income limit guidance below, and additional guidance to the right</i>)</p> <p><i>Optional resources for determining household income limits (adjusted by family size):</i></p> <p><u>Minnesota Housing:</u> For-sale homes (click on "Income Limits" under "Forms and Income Limits", use the 11-county Twin Cities metro area limit. It assumes a family of four): http://www.mnhousing.gov/sites/np/impactfund</p> <p>Rental homes (under "202x Limits", open the latest table and utilize the income limits under Ramsey County that are relevant to expected household sizes): http://www.mnhousing.gov/sites/multifamily/limits</p> <p>For-sale or rental homes, HUD limits (under "Click here for FY 202x IL Documentation", choose 'MSP HUD Metro FMR') https://www.huduser.gov/portal/datasets/il.html#2020_query</p>	<p>For projects including housing only: Specify the number of housing units being offered that are affordable to households at the below income levels. Note: "Affordable" is generally considered either:</p> <ul style="list-style-type: none"> • A for-sale home that costs about 2.5-3 times a household's gross annual income, or • A rental home that costs no more than 30% of a renter household's monthly income. <p>Check and enter the number of housing units being offered that are affordable to households at these income levels (check one or more, as applicable):</p> <p><input type="checkbox"/> 80% of Area Median Income, # of units = _____</p> <p><input type="checkbox"/> 60% of Area Median Income, # of units = _____</p> <p><input type="checkbox"/> 50% of Area Median Income, # of units = _____</p> <p><input type="checkbox"/> 30% of Area Median Income, # of units = _____</p> <p><input type="checkbox"/> Other ___% of Area Median Income, # of units = _____</p> <p><i>For technical assistance in answering these questions, please contact Luis Pereira at luis.pereira@ci.stpaul.mn.us, 651-266-6556, or the Planning staff reviewing your zoning application.</i></p>

(Key policies from the Saint Paul 2040 Comprehensive Plan, over)

Key Policies of the Saint Paul 2040 Comprehensive Plan

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.

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](#), 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 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)

Business Development Policies (Land Use Chapter)

- 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 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)

Transportation Plan Policies

- Does the business or development project's site design align with the transportation **modal priorities** of the city, i.e. Pedestrians and Bicyclists first and second, with a focus on safety; then Access to Transit; and lastly, vehicles? (Policy T-3)
 - Similarly, does the project's building and site design support the reduction of vehicle miles traveled (VMT) by 40% by 2040 by improving transportation options beyond single-occupant vehicles? (Policy T-21)
 - If located in an ACP50 area and/or existing or anticipated area of high pedestrian activity, does the project's site design address **acute pedestrian safety hazards**, and is it consistent with nearby pedestrian infrastructure improvements? (Policy T-25 and City of Saint Paul's Pedestrian Plan)
 - Does the project's off-street parking facilities include short- and long-term bicycle parking and/or secured storage that does not limit access by pedestrians?

- If there is sufficient existing vehicular access, or the site can reasonably be accessed via side streets, alleys or shared driveways, does the business or development project **minimize and consolidate driveway curb cuts**, especially in areas with anticipated high pedestrian activity or with adjacent planned bikeways? (Policy T-12)
- Does the business or development project site design **support all users**, including older people, children and those with mobility constraints, by thoughtfully addressing streetscape issues such as curb cut design, connection to level sidewalks, lighting, accessibility to/from bus stops, and the presence of benches and buffers between the site, sidewalks, and streets? (Policy T-9)
- Does the business or development project's design reduce carbon emissions from motor vehicles by developing on-site or nearby infrastructure that supports vehicle electrification? (Policy T-4)
- Does the business or development project include a Travel Demand Management (TDM) plan and/or include incentives, employer programs, and/or parking policies that encourage and accelerate use of walking, biking, transit, carshare, rideshare, carpooling, flexible work hours and/or telecommuting? (Policy T-29)
- (If large-site development project) Does the proposed business or development project establish (or re-establish) the right-of-way grid with block lengths of 300 to 600 feet in order to increase neighborhood connectivity and accommodate pedestrian-oriented, higher density development? (Policy T-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)
- Does the development project **add new or preserve existing affordable housing** in 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?

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)

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)

[PROPOSED END OF EXTERNAL DOCUMENT]

**ZONING APPLICATION GUIDANCE TO ADDRESS EQUITY AND
COMPREHENSIVE PLAN CONSISTENCY: For Planning Staff**

Below is list of considerations as you complete your zoning staff report findings related to Comprehensive Plan:

- The Zoning Code requires that applications for site plan review, variances, nonconforming use permits, and similar use determinations must be **consistent with the City Comprehensive Plan** in order to be approved.
- Approval of a conditional use permit application requires that the extent, location, and intensity of the conditional use will be in **substantial compliance** with the Comprehensive Plan.
- Minnesota law **prohibits rezoning land in conflict with** the City Comprehensive Plan.

The document is intended as a tool to guide your staff analysis; many of the policy items below relate to racial and social equity, but not all will apply to each individual zoning application. Supporting this guidance is the **introduction to Saint Paul’s 2040 Comprehensive Plan** which includes the following **statement about 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.*

2040 Comprehensive Plan Policy Considerations

To assist review of the zoning application, please **review the application considering how the proposed business or development project** would support the following plan policies:

Policy Considerations	Policy References
Land Use and Economic Development	
Does the project displace people in neighborhoods near fixed rail transit? Particularly people in poverty or people of color? Are there strategies to prevent displacement of existing residents or businesses? (For example, a project could include improvements to existing homes, space for neighborhood or local businesses, etc.)	Policy LU-4 Policy LU-6
Does the project provide community residents more access within walking distance to needed amenities, retail and/or community services? (Is the project near a Neighborhood Node? Does it provide a new type of shop or service?)	Policy LU-31 Policy HP-15
Is the project within an ACP50 (ACP50s map)? How does the project <i>relate</i> to this designation? Consider that the different approaches may be appropriate in different parts of the City based on context. (Does the project provide new housing opportunities or diversify incomes? Does it provide jobs in proximity to transit? Are jobs attainable to the proximate community? Will the project present the stories of historically underrepresented people through architecture or other means?)	Policy LU-3 Policy T-1 Policy H-36 Policy HP-19
Housing and Heritage Preservation	
Will the project increase or preserve housing choices? (Will it offer housing at a price point that is currently limited within the market area where the project is located? Will it offer family-sized, i.e. 3+ bedroom, affordable housing? Will it increase the supply of “missing middle” housing?)	Policy H-16 Policy LU-34 Policy H-36
Will the project provide housing units affordable to households at various income thresholds? (How do affordability levels relate to plan goals for City/HRA-financed projects? How do affordability levels relate to housing costs of the neighborhood?)	Policy H-32 Policy H-33
<p><i>Optional resources for determining household income limits (adjusted by family size):</i> For-sale homes (click on “Income Limits” under “Forms and Income Limits”, use the 11-county TC metro area limit. It assumes a family of four): http://www.mnhousing.gov/sites/np/impactfund Rental homes (under “202x Limits”, open the latest table and utilize the income limits under Ramsey County that are relevant to expected household sizes): http://www.mnhousing.gov/sites/multifamily/limits</p>	

For-sale or rental homes, HUD limits (under "Click here for FY 202x IL Documentation", choose 'MSP HUD Metro FMR') https://www.huduser.gov/portal/datasets/il.html#2020_query	
Advance the preservation of built, cultural and/or natural environments that express the identity and sense of place in Saint Paul?	Policy HP-19
Transportation	
Does this project provide transit-supportive density? <input type="checkbox"/> 50+ units/acre within 1/2 mile of Light Rail Transit <input type="checkbox"/> 25+ units/acre within 1/2 mile of Bus Rapid Transit <input type="checkbox"/> 15+ units/acre within 1/4 mile of Arterial Bus Rapid Transit <input type="checkbox"/> 10+ units/acre within 1/4 mile of High-Frequency Transit	Policy LU-1 Figure LU-5
Does the project prioritize modes as follows: pedestrians, bicyclists, transit users, freight delivery, personal motor vehicles? (Consider sidewalk accommodation, buffering pedestrians from traffic, minimized curb-cuts, CPTED principles, bike parking locations and accommodations, transit stop locations and accommodations, delivery locations, etc.)	Policy T-3
Park Access	
Does the project provide connections to park land? (Does the project fill a sidewalk gap providing improved access to the Mississippi River, a park or parkway?)	Policy PR-36 Policy PR-38 Policy PR-44
Sustainability and Resiliency	
Does the project re-use or rehabilitate existing structures? (Does re-using structures allow a project to provide more affordable rents? Does it keep material out of the landfill? Does it preserve neighborhood character?)	Policy LU-8
Does the project advance green or blue infrastructure? (Are there innovative methods proposed that preserve or reuse stormwater? Are there visible rain gardens, constructed wetlands and tree trenches, that contribute to placemaking? Do stormwater management practices reduce flooding risk – both speed and volume of flow?)	Policy WR-1 Policy WR-3
Does the project reduce the urban heat island effect by preserving or contributing to the urban tree canopy? Does the project minimize impervious surfaces and/or incorporate white, green or blue roofs or low-impact landscaping?	Policy LU-19, T-39, H-14
Is the project built to green building standards? (per the Sustainable Building Ordinance) Will the project be energy efficient, and/or will it decrease the use of fossil fuels (does it have a low carbon intensity)? <ul style="list-style-type: none"> • For large businesses/institutions, strategies may include achieving targets like SB2030 goals (e.g., in 2020, 80% less carbon than the 2005 building code); committing to energy benchmarking, and, after benchmarking, (committing to) achieving a 35% reduction in GHG within 10 years; and/or investing in renewable energy projects onsite or subscribing to local renewable energy installations • For small and mid-size businesses, strategies may include participating in energy conservation programs, annual participation in green power purchase programs, and utilizing commercial solar rooftop capacity (e.g. on-site solar) 	Climate Action & Resilience Plan (CARP) Policies R-1, MI-3, SC-1
Does the project contribute to district stormwater or energy infrastructure? (Will the project include district energy or district stormwater infrastructure?)	Policy WR-2

[PROPOSED END OF INTERNAL DOCUMENT]