



CITY OF SAINT PAUL
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Date: March 22, 2017

To: Neighborhood Planning Committee

From: Kady Dadlez, 651-266-6619

Re: Short Term Rental Zoning Study and Proposed Zoning Code Amendments

Background

What are short term rentals?

One facet of the sharing economy is the online, short term rental of houses, apartments, and condominiums. Continued growth of the sharing economy enabled by technology has led to an increase in websites (host platforms like Airbnb and Expedia) which efficiently enable individuals (hosts) to offer space and for renters to find space. In addition, listings for big events like the Ryder Cup which was recently held in the Twin Cities can be posted on sites like Craig's list months or a year in advance and picked up by a real estate agent that will broker the deal between the owner and renter.

The definition of a short term rental varies by municipality since each chooses to regulate differently. Generally speaking, a short term rental is a dwelling unit, bedroom, or couch rented for a period of less than 30 consecutive days, with or without the owner present. Some jurisdictions use other terms, including vacation rental, timeshare, and tourist rooming house.

Short term rentals in Saint Paul

Short term rentals are occurring in Saint Paul. While there is no official count, there are more than 250 online listings in the City, see attached map. During the recent Ryder Cup event, Airbnb alone reported more than 3,400 guests in the Twin Cities metropolitan area. Ramsey County was home to more than 500 of these.

Under current regulations, short term rentals are not permitted in the City's Zoning Code and there is no licensing requirement. Consequently, existing short term rentals are illegal. Saint Paul is a place of economic vitality and wants to respond to changes in the economy so that innovations are not stifled. The City does not want to pretend that short term rentals are not occurring in the City; it wants to make what is already happening legal and in the process address concerns about health and safety as well as a level playing field.

City Council Adopts Resolution to Study Short Term Rentals

Recognizing the potential impact of short term rentals on neighborhoods, the Saint Paul City Council adopted a resolution asking the Departments of Safety and Inspections (DSI) and Planning and Economic

Development (PED) to study Airbnb and similar companies and how their operations align with current city ordinances, and to evaluate whether current codes ensure that visitors, landlords, Airbnb neighbors, and private property are safe and protected. The resolution also states that departments shall ensure that the appropriate taxes are being collected from these sorts of properties and uses.

Short Term Rental Study and City Council Directive

In July 2016 a Short Term Rental Study prepared by DSI and PED was presented to the Saint Paul City Council. The study looked at existing conditions in Saint Paul, current regulations, current tax collection, potential impacts of short term rentals, and short term rental regulations locally and nationwide. The study also made recommendations and suggested next steps, which the City Council approved. The City Council's recommendations include: 1) develop a zoning code amendment to permit short term rentals and develop standards related to owner occupied and non-owner occupied units; 2) develop an ordinance amendment to fully regulate non-owner occupied units for life safety concerns through the Fire Certificate of Occupancy program; 3) develop a mechanism to ensure tax collection is occurring, possibly via host platforms; 4) develop an ordinance amendment to license host platforms, with specific requirements relating to reporting and compliance; 5) utilize complaints about short term rentals to inform recommendations for future regulations; and 6) educate City staff (police, fire, and inspectors) about the presence of short term rentals in neighborhoods and the potential for complaints.

Potential Impacts of Short Term Rentals

The City of New Orleans issued an exhaustive study on short term rentals in January 2016. This study provides excellent background on the benefits associated with and negative impacts of, short term rentals. These are important for Saint Paul to be aware of as it considers whether and how to regulate short term rentals. The *City of New Orleans Short Term Rental Study* addresses the issues raised in the Saint Paul City Council's resolution requesting this study. The New Orleans study discusses at length the benefits and negative effects associated with short term rentals, as summarized below.

The **benefits** associated with short term rentals:

- Short term rentals are part of the rapidly growing sharing economy
- They provide additional income for hosts and individuals that support short term rentals
- Short term rentals support the tourism economy and provide a significant financial benefit to the region
- There is potential for the City to earn additional income through taxes and fees
- Short term rentals help reduce blight, activate neighborhoods, and support local businesses
- The negative impacts on neighborhood quality of life and affordable housing are over stated as most operators are good managers

The **negative impacts** associated with short term rentals:

- Short term rentals are a commercial encroachment in residential neighborhoods
- Short term rentals reduce neighborhood quality of life due to late night activity, noise, crime, litter, property damage, fire danger, loitering, and reduced on-street parking
- Short term rentals result in a reduction in long-term residents which changes the character of neighborhoods, especially in neighborhoods with the highest concentration of short term rentals
- Short term rentals reduce the number of affordable housing units in a city
- Short term rentals have an unfair competitive advantage from hotels, bed and breakfasts, and legal short term rentals because they are not licensed, do not pay taxes, are not held to the same safety requirements, and have lower capital and operating costs

Short Term Rental Regulations in Minnesota Cities and Beyond

The City of Prior Lake adopted an ordinance in mid-2015, precipitated by complaints from neighbors. The City engaged known short term rental hosts during discussions. They helped shape the regulations and permit process. Those hosts have since received permits from the City. The City is aware of other hosts that have not applied for permits. The City is following up with them. The adopted regulations link the number of parking spaces available to the number of bedrooms that can be rented. The number of guests is governed by the size of the structure and the lot. The ordinance requires there to be an owner or local agent who lives and works within 30 miles of the rental unit and the City's laws related to short term rentals must be disclosed to the guests and posted in the unit. The agent must be available 24 hours a day during the rental period to respond immediately to complaints and the agent's phone number must be provided to the City. The agent must maintain and make available upon request to City staff or law enforcement a list of all current occupants. Disorderly conduct is prohibited on all premises and the ordinance defines and gives examples of disorderly conduct.

The City of Duluth recently adopted an ordinance that provides two options. Those wishing to operate a vacation rental can do so via an interim use permit and those wishing to rent out part of their home can do so with a home share permit. The *interim use permit* regulates the length of stay, number of occupants, number of rooms, off-street parking. A \$650 fee applies. It also requires the permit holder to designate a managing agent who resides within 25 miles of the city to respond 24 hours a day to complaints and the contact information of the managing agent must be provided to all property owners within 100 feet of the property boundary. The permit holder must also post their permit number on all print, poster and web advertisements and also apply for and be granted state and local sales tax numbers. Prior to rental the building must be inspected and a permit issued by the Fire Prevention office. The *home share permit* regulates the length of stay, number of occupants, and owner occupancy. A \$100 fee applies annually. Like the interim use permit, the home share permit holder must also post their permit number on all print, poster, and web advertisements and also apply for and be granted state and local sales tax numbers. Prior to rental the building must be inspected and a permit issued by the Fire Prevention office.

The City of Eagan changed its definition of dwelling unit in November 2015 to prohibit short term rentals of less than 30 days where an owner is not present. An owner can rent out a room in an occupied unit for less than 30 days as long as the owner is present and the guest has full access to the home during the stay. This use is not regulated. Registered accessory dwelling units can be rented for 30 days or more.

The City of Burnsville prohibits short term or vacation rental in residential zoning districts. It recently adopted an ordinance restricting short term or vacation rental in its business licensing section of the City Code (the City Attorney felt that licensing was a more appropriate part of the code to regulate the use than the Zoning Ordinance). Issues identified by the city council are: 1) vacation rentals bring strangers into a neighborhood; 2) people come and go at all times of the day and night; 3) since customers are not residents, they have no interest in maintaining the neighborhood; 4) noise; 5) trash; and 5) transient nature of the operation.

The City of Minneapolis is in the process of developing regulations for short term rentals.

The City of New Orleans Short Term Rental Study from January 2016 includes an assessment of regulations adopted by cities around the United States. While New Orleans is a major tourist destination and has far more short term rental units than Saint Paul, the information gathered in its study from other cities around the country has value and relevance to the conversation in Saint Paul about whether and how to regulate short term rentals. Important findings in the report are noted below.

The *City of New Orleans Short Term Rental Study's* assessment of regulations in other cities identified the components of a short term rental ordinance and discusses each at length. The main take away is that each city regulates differently depending upon the issue it is trying to address, but many cities tend to include most of these items in their regulations. The study also notes that the success experienced by the cities surveyed varied and that the best regulations were adapted over time as issues arose.

- **Definitions** (most are called short term rentals though some use vacation rental, timeshare, or tourist rooming house)
- **Categories** (full dwelling unit rental, single-room rental, or shared-room rental)
- **Size limitations** (number of rooms that can be rented)
- **Concentration** (limits on number of units within a geographic area)
- **Time limitations** (generally less than 30 days, the number of times a unit can be rented per year)
- **Owner occupancy** (whether owner or tenant occupancy is required and for how many days per year the owner must occupy the unit)
- **Use Standards and Guidelines** (no changes to allow a separate entrance, parking, agent contact information, posting of city ordinances, accessible agent to respond quickly to complaints, limiting number of visitors guests may have)
- **Fees** (generally between \$100 and \$150)
- **Notice** (information posted alerting surrounding properties of the use as a short term rental)
- **Taxes** (collection and payment of taxes either by hosting platform or host)
- **Fines and enforcement** (fees should be high enough to deter violations and ordinance should allow for revocation of permit or license for repeated violations)
- **Building code and inspections** (most require at a minimum fire and carbon monoxide detectors, some require inspections, many require permits, licenses, or registrations)

The *City of New Orleans Short Term Rental Study* found that short term rentals are residential uses with commercial type impacts. Generally, short term rentals where the owner or tenant is present are associated with fewer impacts than those where no owner or tenant is present and consequently, tended to be regulated with few restrictions. Short term rentals where the owner or tenant is not present tended to be regulated more strictly because the impacts of their use tended to be more commercial in nature. The City emphasized the importance of having a structure in place to regulate short term rentals to be able to minimize the negative impacts on surrounding properties and facilitate enforcement on problem operators.

Workgroup Considers and Reviews Proposed Short Term Rental Regulations

A workgroup was convened to consider proposed amendments to allow short term rentals. Workgroup participants included host platform representatives from Airbnb and Expedia, owner occupied hosts, non-owner occupied hosts, residents, bed and breakfast hosts, hospitality industry and Visit Saint Paul representatives, a Planning Commission member, and Office of Financial Services staff. The workgroup met on December 7, 2016 and February 7, 2017 to review, discuss, and advise on the proposed amendments.

Listening Session Held on Proposed Short Term Rental Regulations

A listening session was held on January 19, 2017. It was an open dialogue with the community to learn about the pros and cons of short-term rentals in Saint Paul neighborhoods and any looming concerns with how the City proposes to regulate the new use. The listening session summary is attached.

How Saint Paul Proposes to Regulate Short Term Rentals

While the City Council believes there is a need to regulate short term rental uses, these uses currently operate throughout the City with relatively few complaints or calls to police. The City plans to regulate short term rentals through licensing, fire certificate of occupancy inspection, and zoning. Regulations are proposed to address life safety and habitability. Experience from other cities suggests that non-owner occupied short term rentals may be more likely to result in negative impacts on the surrounding area than owner occupied rentals. Therefore, to some extent the City intends to regulate short term rentals where the owner is present differently from ones where the owner is not present. Providing a level playing field for bed and breakfast residences and hotels is another factor when considering how to regulate short term rentals. The impact of short term rentals on the availability of affordable housing is something that is of great concern in some cities but not something Saint Paul believes is a cause for concern at this time.

1. Licensing

The City intends to license host platforms that offer booking services such as Airbnb and Expedia as well as individual hosts. Under this model, the platform would be responsible for providing requested data to the City and removing host listings when the platform has been notified the listings are not in compliance with city regulations. Individual short term rental units must: 1) be allowed by zoning; 2) maintain a lodging log; 3) non-owner occupied units must have a current fire certificate of occupancy; 4) provide proof of Lodging and Sales tax payment; 5) provide proof of appropriate property insurance; and 6) be licensed by the City. If a unit is not in compliance with all applicable laws, the platform, upon being notified that the unit is not compliant, would have the responsibility to remove the host unit from its platform. If the host platform fails to comply, adverse action against the platform license could be taken. In addition, the non-compliant individual host could also receive a citation. DSI is in the process of developing licensing requirements for City Council consideration.

2. Fire Certificate of Occupancy

Short term rentals are residential uses with commercial type impacts. Generally, short term rentals where the owner or resident occupant is present are associated with fewer impacts than those where no owner or resident occupant is present and consequently may be regulated with few restrictions. Short term rentals where the owner or tenant is not present may be regulated more strictly because the impacts of their use may be more commercial in nature. It is important to have a structure in place to regulate short term rentals to be able to minimize the negative impacts on surrounding properties and facilitate enforcement on problem operators.

Short term rentals are, to some extent, regulated by the fire certificate of occupancy inspection program. The existing fire certificate of occupancy inspection program is sufficient to address life safety and habitability issues of short term rentals. The City currently requires a fire certificate of occupancy for all buildings with three or more units and for all non-owner occupied one and two family dwelling units. Therefore, all short term rental units in non-owner occupied units would fall under the existing fire certificate of occupancy inspection program. Short term rentals in owner occupied or resident occupied units would not require a fire certificate of occupancy.

Residential fire certificate of occupancy inspections are done every one to six years depending upon the number and severity of violations found in the most previous full fire certificate of occupancy inspection. Commercial inspections are done based upon the occupancy type ranging from once a year to once every three years. No changes to the fire certification of occupancy program are proposed.

3. Zoning

The City does not have an ordinance regulating short term rentals and short term rental is not listed as a use permitted in the Zoning Code. Consequently, existing short term rentals are illegal. The proposed zoning amendment makes short term rentals legal and establishes standards and conditions for the use. While there are short term rentals in Saint Paul, they do not generate a lot of complaints or calls for police. Therefore, the proposed amendment seeks to permit the use with a minimum amount of regulation.

Proposed Amendment – Short Term Rental Dwelling Unit

The short term rental dwelling unit amendment creates Zoning Code Sec. 65.645 and provides a definition for the use. An off-street parking requirement is also established for the use. Standards and conditions establish a minimum length of stay, prohibit exterior signage in residential districts, and prohibit commercial or social events. Standards and conditions also limit the number of short term rental dwelling units on a zoning lot to one in one- and two-family residential districts, except that two short term rental dwelling units may be permitted in an owner occupied duplex provided the duplex owner is in residence during the rental period. In all other zoning districts up to half of dwelling units in multi-unit buildings, to a maximum of four, may be used for short term rental. The reason the number of units is limited to four is that five or more units meets the State definition of a hotel. Finally, the amendment limits the occupancy of a short term rental dwelling unit to the Zoning Code definition of family. This is consistent with the current Zoning Code occupancy limit for a dwelling unit citywide and treats short term rental dwelling units similarly to bed and breakfast residences with one guest room. For reference, the definition of family is:

Zoning Code Section 60.207 – F

Family. One or two persons or parents, with their direct lineal descendants and adopted or legally cared for children (and including the domestic employees thereof) together with not more than two persons not so related, living together in the whole or part of a dwelling comprising a single housekeeping unit. Every additional group of four or fewer persons living in such housekeeping unit shall be considered a separate family for the purpose of this code.

If someone wants to operate a short term rental dwelling unit that allows more individuals than meets the definition of family they would need to obtain a conditional use permit. Criteria for determining total occupancy in these situations would include the dwelling size, lot size, provision of off-street parking, and fire certificate of occupancy inspection. The reason to require a conditional use permit to allow occupancy to exceed the definition of family is that this is a more commercially intensive use and may be more susceptible to reducing neighborhood quality of life due to late night activity, noise, crime, litter, property damage, fire danger, loitering, and reduced on-street parking.

Questions about what constitutes a family have been raised. The following table contemplates different scenarios and provides guidance for the maximum number of guests allowed.

Maximum number that can occupy the short term rental without a conditional use permit:

| <u>Host (Lives On Site)</u> | <u>Maximum Number of Guests</u> |
|-------------------------------------|--|
| Single person with no kids | 3 adults, 2 of which can include kids |
| Single person with kids | 3 adults, 1 of which can include kids |
| Two adults with no kids | 2 adults, of which both can include kids |
| Two adults, 1 of which has kids | 2 adults, 1 of which can include kids |
| Two adults, both of which have kids | 2 adults, no kids |
| Three adults with no kids | 1 adult, including kids |
| Three adults, 1 of which has kids | 1 adult, including kids |
| Three adults, 2 of which have kids | 1 adult, no kids |

| <u>Host (Lives Off Site)</u> | <u>Maximum Number of Guests</u> |
|------------------------------|---------------------------------------|
| None | 4 adults, 2 of which can include kids |

“Kids” as used above includes lineal descendants and adopted or legally cared for children and any domestic employees (like a nanny).

The occupancy of a short term rental that exceeds the definition of a family for large one- and two-family dwellings on large lots would require a conditional use permit from the Planning Commission. Neighborhood notification would be required and a public hearing would be held. The Planning Commission may impose such reasonable conditions and limitations in granting an approval as are determined to be necessary to fulfill the spirit and purpose of the zoning code and to protect adjacent properties. The process takes to seven weeks and there is an \$840.00 application fee.

Per Sec. 61.501 of the Zoning Code, in granting a conditional use permit the Planning Commission must find that:

- (a) The extent, location and intensity of the use will be in substantial compliance with the Saint Paul Comprehensive Plan and any applicable subarea plans which were approved by the city council.
- (b) The use will provide adequate ingress and egress to minimize traffic congestion in the public streets.
- (c) The use will not be detrimental to the existing character of the development in the immediate neighborhood or endanger the public health, safety and general welfare.
- (d) The use will not impede the normal and orderly development and improvement of the surrounding property for uses permitted in the district.
- (e) The use shall, in all other respects, conform to the applicable regulations of the district in which it is located.

Proposed Amendment - Bed and Breakfast Residence

In addition to the proposed short term rental dwelling unit ordinance, an amendment to the bed and breakfast ordinance Zoning Code Sec. 65.641 is proposed to make the language regarding use of dining and other facilities of a bed and breakfast residence consistent with the language for short term rental dwelling units, which prohibits commercial and social events.

Recommendation for Committee Action

Staff recommends the Neighborhood Planning Committee forward the following proposed amendments to Zoning Code §§ 65.641, 65.645, 66.221, 66.321, 66.421, 66.521, 63.207, to the Planning Commission to release for public review and schedule a public hearing for May 19, 2017.

NOTE: Existing language to be deleted is shown by ~~strikeout~~. New language to be added is shown by underlining. [Drafting notes are in brackets.]

Sec. 65.641. Bed and breakfast residence.

A dwelling unit, located within a one- or two-family dwelling, in which guest rooms are rented on a nightly basis for periods of less than a week and where at least one meal is offered in connection with the provision of sleeping accommodations only.

Standards and conditions in residential and BC community business (converted) districts:

- a. In residential districts, a conditional use permit is required for bed and breakfast residences with two or more guest rooms, and for any bed and breakfast residence located in a two-family dwelling. In RL—R4 residential districts, a bed and breakfast residence may contain no more than one guest room.
- b. The bed and breakfast residence may be established in a one-family detached dwelling or a two-family dwelling, located within a single main building.
- c. The guest rooms shall be contained within the principal structure.
- d. There shall be no more than one person employed by the bed and breakfast residence who is not a resident of the dwelling.
- e. ~~Dining and other facilities shall not be open to the public, but shall be used exclusively by the residents and registered guests.~~ Use of a bed and breakfast residence for any commercial or social event is prohibited.
- f. No additional exterior entrances shall be added to the structure solely for the purpose of serving guest rooms.
- g. The zoning lot shall meet the minimum lot size for the one-family dwelling or two-family dwelling in the district in which it is located, and shall have a minimum size according to the following combination of dwelling units and guest rooms:

| Dwelling Units | Guest Rooms | Minimum Lot Size |
|----------------|-------------|------------------|
| 1 | 2 | 6,000 |
| 1 | 3 | 7,000 |
| 1 | 4 | 8,000 |
| 2 | 1 | 6,000 |
| 2 | 2 | 7,000 |
| 2 | 3 | 8,000 |

- h. One-family dwellings may contain no more than four guest rooms. Two-family dwellings may contain no more than three guest rooms.
- i. No bed and breakfast residence containing two through four guest rooms shall be located closer than 1,000 feet to an existing bed and breakfast residence containing two through four guest rooms, measured in a straight line from the zoning lot of an existing bed and breakfast residence.

...

Sec. 65.645. Short term rental dwelling unit Reserved.

A dwelling unit, or a portion of a dwelling unit, rented for a period of less than thirty (30) days.

Standards and conditions:

- (a) In RL – RT1 districts, there shall be no more than one (1) short term rental dwelling unit on a zoning lot unless a duplex is owner occupied and the owner is in residence during the rental period. In other districts up to 50 percent of dwelling units, to a maximum of four (4), for any building with three (3) or more dwelling units may be short term rental dwelling units.
- (b) No more than one (1) rental of a short term rental dwelling unit shall be permitted per day. Use of a short term rental dwelling unit for any commercial or social events is prohibited.
- (c) No exterior identification sign of any kind shall be permitted in residential districts.
- (d) Total occupancy of a short term rental dwelling unit shall not exceed the definition of family in Section 60.207 allowed in a single housekeeping unit except that occupancy in excess of the definition of family may be permitted with a conditional use permit, on a case by case basis, for large one- and two-family dwellings on large lots.

Table 66.221 Principal Uses in Residential Districts

| Use | RL | R1-R4 | RT1 | RT2 | RM1 | RM2 | RM3 | Definition (d) Standards (s) |
|--|------------|------------|------------|------------|------------|------------|------------|---------------------------------|
| Commercial Uses | | | | | | | | |
| <i>Commercial Lodging</i> | | | | | | | | |
| Bed and breakfast residence | P | P | P/C | P/C | P/C | P/C | | (d), (s) |
| <u>Short term rental dwelling unit</u> | <u>P/C</u> | <u>(d), (s)</u> |

Table 66.321 Principal Uses in Traditional Neighborhood Districts

| Use | T1 | T2 | T3 | T4 | Definition (d) Standards (s) |
|---|------------|------------------------------|------------------------------|------------------------------|---------------------------------|
| Commercial Uses | | | | | |
| <i>Commercial Recreation, Entertainment and Lodging</i> | | | | | |
| Reception hall/rental hall | | C | C | C | |
| <u>Short term rental dwelling unit</u> | <u>P/C</u> | <u>P/C</u> | <u>P/C</u> | <u>P/C</u> | <u>(d), (s)</u> |
| Theater, assembly hall | | C/P <u>P/C</u> | C/P <u>P/C</u> | C/P <u>P/C</u> | (s) |

Table 66.421 Principal Uses in Business Districts

| Use | OS | B1 | BC | B2 | B3 | B4 | B5 | Definition (d) Standards (s) |
|---|------------|------------|------------|------------|------------|------------|------------|---------------------------------|
| Commercial Uses | | | | | | | | |
| <i>Commercial Recreation, Entertainment and Lodging</i> | | | | | | | | |
| Reception hall/rental hall | | | | P | P | P | P | |
| <u>Short term rental dwelling unit</u> | <u>P/C</u> | <u>(d), (s)</u> |
| Steam room/bathhouse facility | | | P | P | P | P | P | (d) |

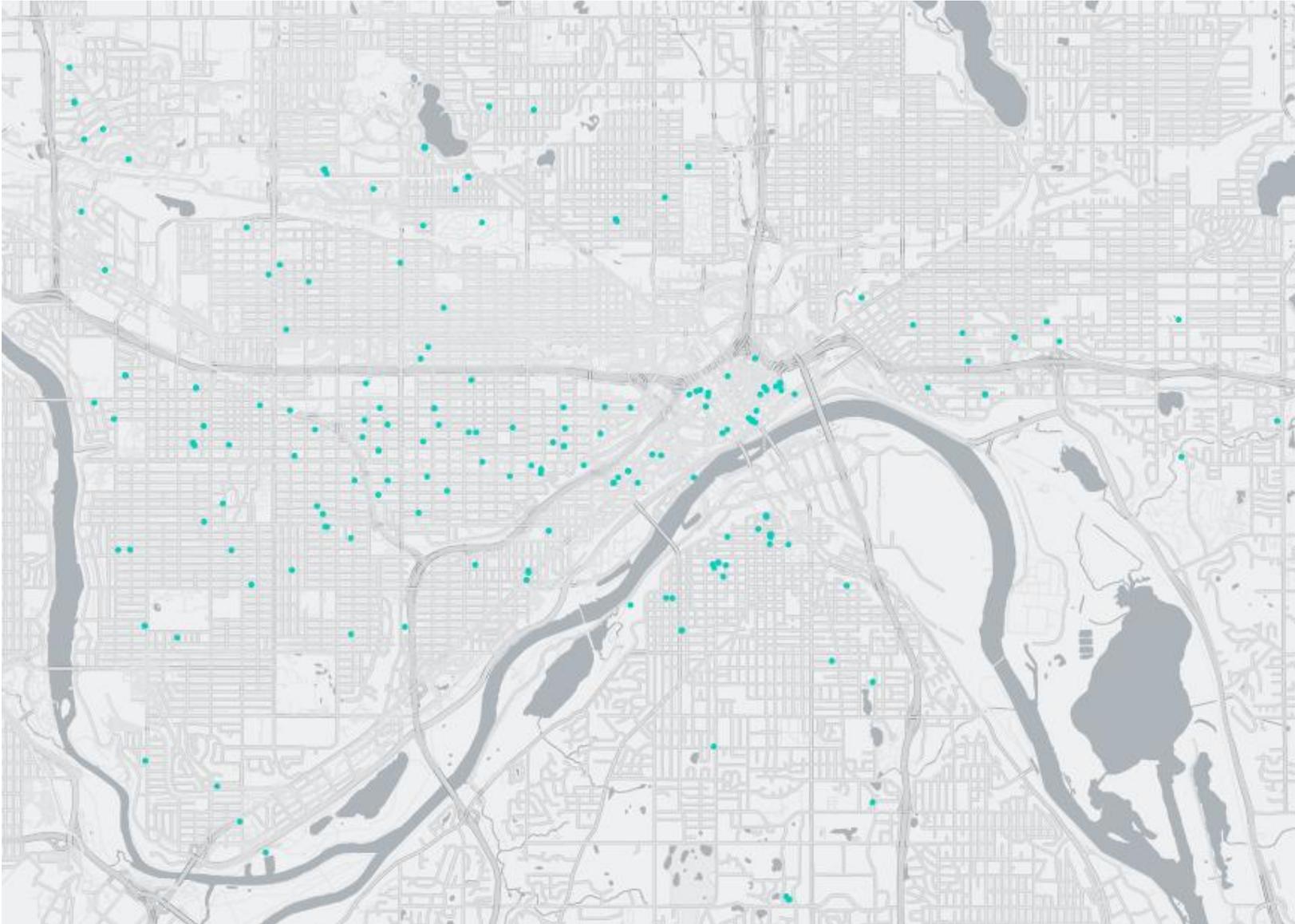
Table 66.521 Principal Uses in Industrial Districts

| Use | IT | I1 | I2 | I3 | Definition (d) Standards (s) |
|---|------------|------------|------------|----|---------------------------------|
| Commercial Uses | | | | | |
| <i>Commercial Recreation, Entertainment and Lodging</i> | | | | | |
| Reception hall/rental hall | P | P | C | | |
| <u>Short term rental dwelling unit</u> | <u>P/C</u> | <u>P/C</u> | <u>P/C</u> | | <u>(d), (s)</u> |
| Steam room/bathhouse facility | P | P | P | | (d) |

Table 63.207 Minimum Required Off-Street Parking By Use

| Land Use | Minimum Number of Parking Spaces |
|--|--|
| Lodging | |
| Bed and breakfast residence | 1 spaces per dwelling unit and 0.5 spaces per guest room |
| <u>Short term rental dwelling unit</u> | <u>1 space per dwelling unit and 0.5 spaces per every 2 adult guests</u> |

Short Term Rental Hosts in Saint Paul – July 2016



To: Dan Niziolek

From: Jerome Benner II

Re: Listening Session for Short-Term Rentals (Airbnb's and VRBO's)

Purpose:

The purpose of this listening session was to create an open dialogue with the community to learn about the benefits of short-term rentals in their respective neighborhoods and any looming concerns with how the City proposes to regulate the new use. Councilmember Prince attended the meeting on behalf of her constituents. The following information are comments collected from the meeting held on January 19, 2017:

Benefits of short-term rentals?

- Building new relationships within the community
- Alternative lodging options for those who do not want to stay in a traditional hotel
- More personal feel. Better for families that are traveling together
- Generates income opportunities for the host(s)
- Builds City's image and generates money for the local economy
- Company for those that are lonely and enjoy having additional guests stay with them
- More eyes on the neighborhood
- Less wear and tear on the homes because guests are staying for shorter periods of them than long-term renters
- Helps with hotel overflow

Issues or concerns with short-term rentals?

- Safety issues – people have died at Airbnb's (Airbnb now supplies Co2 and smoke detectors)
- No notice to residents. Many felt they do not have a say in what goes on in their neighborhoods
- Fear of not knowing who is staying next door (stranger danger!)
- Creating economic/commercial uses in predominately residentially zoning areas
- Hosts discriminating against guests
- Despite being a good host, residents are concerned bad guest will still be an issue
- Traffic congestion on local street systems
- Clarity in ordinance
- Unsavory entrepreneur host platforms

Ways to ensure short-term rentals are a beneficial part of neighborhoods?

- De-regulate traditional bed and breakfast uses to make it easier for business owners
- Require inspections of all short-term rentals
- Platform to allow residents to submit complaints regarding the improper use of a short-term rental
- Education hosts and potential guests about short-term rentals prior to their stay
- Database to collect ID from residents
- Separation requirement to help mitigate impact on neighborhoods
- State-Sponsored listing site
- Host pays inspection fees
- Create off-street parking requirements for hosts
- Require a Conditional Use Permit for all short-term rentals



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March 29, 2017

To: Neighborhood Planning Committee

From: Tony Johnson and Josh Williams

Re: Snelling Avenue South 40-Acre Zoning Study

Background and Summary

In July 2015, the Saint Paul Planning Commission initiated the South Snelling Zoning Study in recognition of the vision of a mixed use corridor on Snelling Avenue outlined in the Saint Paul Comprehensive Plan and neighborhood plans covering the study area. The initializing resolution also noted the imminent start of A Line Bus Rapid Transit (BRT) service on Snelling. The zoning study analyzed current land uses and zoning along Snelling Avenue from interstate 94 to Ford Parkway and within approximately one-quarter mile of intersections with other arterial roads.

The study's primary recommendation is broad adoption of traditional neighborhood zoning designations. Areas proposed for rezoning are primarily currently zoned for multifamily or commercial uses, but also include some parcels fronting on Snelling Avenue that are currently zoned for single family use. The conversion to traditional neighborhood zoning from the current mix of multifamily and commercial designations confers several advantages. Traditional neighborhood districts allow for a range of both commercial and residential uses in a single district, allowing more flexibility in development and encouraging the finer-grained mixing of uses seen in traditional urban form. Traditional neighborhood districts also include design standards which result in more transit- and pedestrian-friendly development. The net impact of the proposed changes on potential density of development is moderate, although traditional neighborhood district dimensional standards do allow for greater density than in the equivalent commercial and residential districts (e.g., T2 versus B2 and RM2). Lastly, while limited up-zoning of some single-family residential parcels near A Line BRT stations was considered—to allow for moderate density development such as duplexes in areas with good access to transit—this strategy is not suggested in these recommendations.

Community Process and Concerns

Prior to initiating the formal portion of the Planning Commission review process, staff worked with the three district councils in the study area (Union Park, Macalester Groveland, and Highland) to engage residents, property owners, and other stakeholders through a series of community meetings regarding the zoning study. The purpose of these meetings was to help stakeholders better understand the purpose of the zoning study, the potential changes to zoning, and how those changes might shape future development in the study area. The meetings also

provided a forum in which members of the community could identify areas of concern and provide other feedback on potential zoning changes.

While comments indicated substantial support for the proposed zoning changes, many people voiced concerns about some potential impacts of the changes as redevelopment occurs in the future. Common concerns cited were the potential for increased traffic and congestion (both on Snelling and cross-streets), the potential height of new developments, cumulative impacts of higher density redevelopment, and the impacts to on-street parking. Concerns over on-street parking have been heightened by the construction of new medians on portions of Snelling. As noted, the impact of the zoning changes proposed in this study are moderate in terms of increased potential density. In this context, the most appropriate avenue for addressing the concerns around traffic and building mass/height is through careful review, using established City processes, of development on a project by project basis. Potential impacts on traffic may need to be reassessed if a substantial amount of new development occurs along the corridor that achieves the maximum permitted density in the proposed zoning districts. Because of the flexibility of the proposed traditional neighborhood district zoning, making accurate predictions about the scale and impact on traffic patterns of future development would be based on numerous assumptions. It is staff's opinion that because of the numerous assumptions that would need to be made about future development, attempting to accurately predict these potential impacts is unfeasible, and it was therefore not done as a part of this study. Additionally, as new development occurs, impacts on traffic and parking may be mitigated the trend towards a transportation mode shift continues from vehicular trips to people taking a greater amount trips using alternative forms of transportation. Along the Snelling Avenue corridor in particular, there is been a trend towards increased transit ridership.

The potential impact of the additional height of buildings is addressed by provisions in the proposed traditional neighborhood zoning districts, and is comparable to the maximum heights that permitted under the existing zoning districts that are being recommended for rezoning. The aforementioned provisions that address maximum heights in the proposed zoning districts will be addressed in further detail in the general zoning analysis.

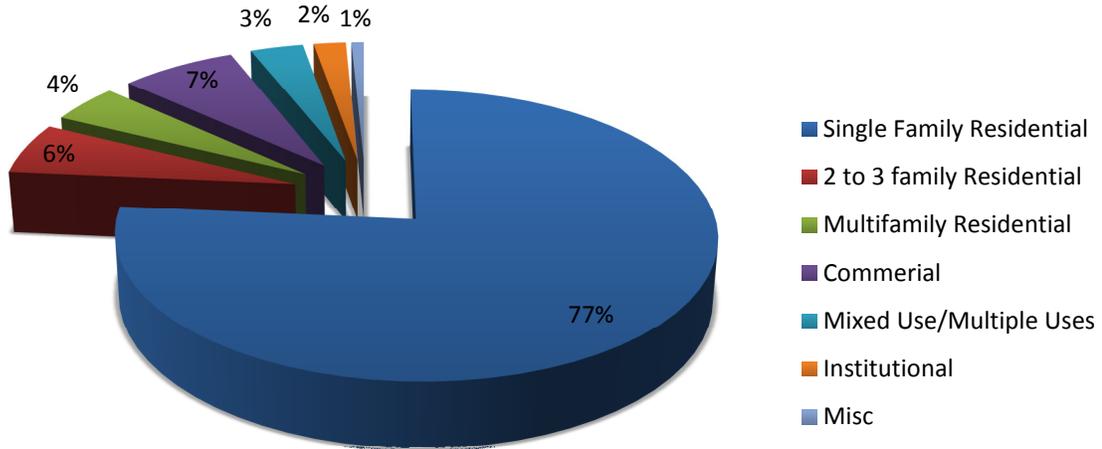
Existing Land-Use and Zoning

The current zoning in the study area generally reflects the existing underlying land uses, both along Snelling and the major cross-streets and in the adjacent established neighborhoods. Overall, 61% of parcels are currently zoned single family residential, 13% for duplexes, 16% multifamily, and 10% commercial.

Existing land-use Inventory

| | |
|---------------------------|------|
| Single Family Residential | 1294 |
| 2 to 3 family Residential | 99 |
| Multifamily Residential | 74 |
| Commercial | 123 |
| Mixed Use/Multiple Uses | 56 |
| Institutional | 34 |
| Misc | 13 |

Existing Land-Use Inventory



The majority of the study area is in single family residential use. The predominance of single family residential development in the established neighborhood is most pronounced in the southern portion of the study area where the land-use pattern is more homogenous. There are also a number of single family residential uses fronting arterial streets. Many in this latter group are zoned RM2 multifamily. While this zoning district permits higher density residential uses, the parcels are too small for redevelopment for multifamily uses without assembly of multiple parcels or variance, due to the 9000 square foot minimum lot size requirement in RT2 and higher residential districts.

Further north in the study area the existing land-use is more diverse in areas defined by the comprehensive plan as being within an established neighborhood. In Union Park in particular, the land use in these areas consists of a mix of single family and two family residential uses, along with scattered multifamily, and the zoning is primarily RT1 two-family. Most of the parcels meet the minimum lot size of 6000 square feet required for a duplex.

Existing mixed-use and commercial buildings in the study area, and the vast majority of multifamily buildings, are sited on parcels with Snelling Avenue frontage or that front other arterial and collector streets near their intersection with Snelling. The exception is a few clusters of multi-family structures in the portion of the study area north of Summit Avenue. Existing multifamily and commercial development is low to medium density, consisting primarily of one to three story structures. Where commercial buildings exceed one story, they are generally older structures with housing in the upper stories. For the most part, these structures/uses are well below maximum densities allowed under current zoning. The average floor area ratio currently achieved on the parcels that are being considered for rezoning is 0.63; maximum allowed floor area ratio (FAR) under B2 is 2.0, and approximately 1.75 under RM2. However, certain provisions in the current zoning districts, notably minimum lot size requirements, may be impeding potential growth along the corridors in the study area. Under the proposed T2 and T3 zoning along the corridor, it would be theoretically possible to achieve a floor area ratio of 3.0 for new development, provided every new structure in the T2 district was built with structured parking.

General Zoning Analysis:

The recommended zoning changes are primarily on parcels that are zoned for commercial or multifamily residential uses. A small number of parcels that are currently zoned for single family residential uses are also being recommended for rezoning. These are primarily parcels oriented to Snelling on blocks between St. Clair and Randolph, but also include a parcel on the south side of St. Clair just west of Snelling (currently used for parking for the adjacent commercial uses), a parcel on Brimhall just south of St. Clair (currently used for parking for the adjacent multifamily residential), and a parcel owned by Macalester College on Macalester Street to the north of Grand Avenue (currently occupied by a multifamily residential building). Out of the total of 1693 parcels in the study area, 313 parcels adjacent or in close proximity to Snelling are being recommended for rezoning. Of those, just 38 parcels are currently zoned for single-family use. These are the general changes in zoning districts being proposed:

- Parcels zoned B3, general business district, would be rezoned to T2 or T3 traditional neighborhood.
- Parcels zoned RM2, multi-family residential, would be rezoned to T2 traditional neighborhood.
- Parcels zoned B2 community business district would be rezoned to T2 traditional neighborhood.
- Parcels zoned R4 single family residential would be rezoned to T1 traditional neighborhood.

Traditional neighborhood zoning districts are intended to foster the growth and development of mixed use, transit-oriented development. In contrast to the higher-density residential and commercial zoning districts currently used along the corridor, which largely segregate commercial and residential uses into different districts, they allow a range of both commercial and residential uses in in the same district. Allowing this wider range of uses on the corridor will result in future land use pattern that is more organic and market driven, and will allow commercial and residential development in areas that could only be one or the other under the current zoning. The vast majority of the uses that are currently permitted in B2 and B3 commercial districts as well as the R4 and RM2 residential districts are also permitted in the traditional neighborhood districts, with the exception of some auto uses permitted in the B3 community business district. The proposed zoning change will prohibit new auto uses from being established on the corridor and the existing automotive uses would become legally nonconforming. Unlike the majority other nonconforming uses, however, there is a specific provision in the zoning code that would allow automotive uses that will become legally nonconforming as a result of the zoning changes to expand without Planning Commission approval, as if they were permitted uses in the district.

The traditional neighborhood districts also differ from other zoning districts in that they include extensive design standards, and have provisions that the drive building mass towards the street. The traditional neighborhood district design standards regulate building features such as finish materials, window openings, the placement of doors, and the placement of parking. In reviewing new development in traditional neighborhood districts, there is a strong emphasis on ensuring that the design of new development helps contribute to a pedestrian friendly streetscape and corridor. Provisions in these zoning districts also take into account how new development interacts with lower density residential zoning districts, by having a maximum height of 25 ft. at property lines which abut these districts. Structures can exceed this height limit if stepped back from the property lines a distance equal to the additional height, or if they obtain a conditional use permit from the Planning Commission.

Due to the traditional neighborhood design standards, a significant portion of existing commercial structures will become nonconforming in terms of their design, orientation on lot, and placement of parking if the proposed zoning changes are adopted. Conversely, a significant portion of the existing multi-family residential structures would become conforming in regards to

the lot coverage of their building foot print. The nonconforming status of the commercial structures will not prohibit the reuse of buildings for conforming uses; nonconforming buildings may be expanded or altered, and lot improvements may be made, so long as they do not increase the nonconformity. Most would multi-family structures would conform to the traditional neighborhood design standards, but additional parking would need to be added on or near the site if they were expanded. and structural issues that would arise from vertical expansions. The zoning change would make it possible for future multiple family structures near these existing multiple family uses to assume a built form which is more consistent with the existing context of multifamily development along the corridor than would be allowed under current multifamily zoning district standards.

Existing land use and zoning and recommended zoning changes are discussed below. The discussion is organized around roughly ½ mile segments of Snelling Avenue, each centered on a station for the A Line BRT.

Snelling and Dayton Station Area

The Dayton Avenue bus rapid transit (BRT) station area is located in the most northerly portion of the study area. The station area has the most diverse mix of any in the study area in terms of both land uses and zoning districts, including industrial, commercial, and residential land uses and zoning districts. The Soo Line Rail Spur, just north of the Dayton Avenue Station, is a significant physical barrier and acts as a dividing line between general land use areas in the comprehensive plan. The comprehensive plan identifies the area north of the Soo Line rail spur as industrial, while the area south of the rail spur is identified as being within a mixed use corridor along Snelling Avenue and along Selby Avenue east of Snelling, as being within a residential corridor along Marshall Avenue, and as being within an established neighborhood in areas outside of these corridors.

The existing land-use and zoning generally follow the land-use designations outlined in the comprehensive plan south of the Soo Line rail spur. The area north of the spur is identified in the comprehensive plan as being industrial, and there is a significant amount industrial zoning and land use in the area, particularly adjacent to the rail spur. However, there is also commercial development and zoning along Snelling Avenue, and residential zoning and land uses in the area as well. There are three parcels that are zoned I1, light industrial, which are all owned by Cooperative Plating. The company owns another parcel at 271 Snelling Avenue, zoned B3 general business, which houses the company's offices. Staff is recommending rezoning this parcel on Snelling to IT transitional industrial. The IT transitional industrial district is intended to provide sites for commercial, office, and light industrial uses that are compatible with nearby residential and traditional neighborhood districts. This rezoning would be consistent with the existing land-use pattern and would allow the business to potentially shift a limited scope of activities to this parcel. The IT district has many of the same design standards as the traditional neighborhood districts, such as requiring buildings to anchor the corner, requiring front façade articulation, window and door opening requirements, and requiring parking to be to the rear or side of the principle building when possible. These design standards would help ensure that any interim development of this parcel is compatible with future development in the surrounding area.

This study is recommending that the B3 (general business) parcels north of the rail spur, all fronting Snelling Avenue, be rezoned to T3 traditional neighborhood, with the exception of the Miriam Park Substation at 1560 Igelhart Avenue. The change from B3 general business to T3 traditional neighborhood is intended to promote higher density pedestrian- and transit-oriented development. The use of T3 zoning at this location is appropriate because of the close proximity to light rail, the interstate, and the Snelling Midway site. The T3 district permits a maximum floor area ratio of 3.0 and a maximum building height of 55 feet, with heights up to 90 feet with a conditional use permit, with additional stepbacks required above 75 feet. The area north of the rails spur would act as a transition zone from the more intensive development envisioned at the Snelling Midway site north of Interstate 94 to the proposed T2 zoning districts further south on Snelling Avenue.

South of the rail spur, the study is proposing rezoning parcels zoned RM2 multifamily residential and B2 community business to T2 traditional neighborhood. T2 allows a similar range of uses to the RM2 and B2 districts, and the overall density of development permitted in the three districts is also comparable. In the T2 district, the maximum permitted FAR of new structures is 2.0, but can be increased to 3.0 if buildings are constructed with structured parking. In the B2 district the maximum FAR is 2.0, and in an RM2 district the dimensional standards can be converted to a maximum FAR of approximately 1.75.

The change to T2 would have other implications for the redevelopment potential of some properties. There are provisions of the RM2 district that have possibly impeded development of new multifamily buildings on parcels with this zoning designation. In the district, any structure with three or more units requires a minimum lot area of 9000 square feet, the maximum building foot print is limited to 35% percent of the lot area, and 25' front and rear setbacks and 9' side yard setbacks are required. None of the existing multi-family structures in this station area could be built today under these standards without multiple variances. By contrast, all of the existing multifamily buildings in the station area appear to conform to T2 dimensional standards. If the recommended zoning changes are adopted, infill development on properties in the area currently zoned RM2 could more closely match existing multifamily development in terms of form and mass. The changes would also provide flexibility in terms of allowed uses for all properties proposed for rezoning.

Snelling and Grand Station Area

The Snelling and Grand station is at the north end of the Macalester College campus, and the existing land-use and pattern of development are heavily influenced by the proximity to this institution. There are a number of large institutional buildings on the main campus and along Summit Avenue. The institutional parcels along Summit Avenue are currently zoned RT1, RT2, and R3. This study is proposing to rezone the Macalester-owned parcels on Summit Avenue to RM1, which is consistent with the existing structures and uses. Rezoning these parcels to RM1 will eliminate the 25' maximum height at the rear property line that would apply on abutting parcels on Grand Avenue proposed for rezoning to T2 and T3. The Summit Avenue parcels for rezoning are, for the most part, within a historic overlay district and any exterior changes proposed to structures or new construction on these parcels would require review by the Heritage Preservation Commission and would need to be consistent with the historic district guidelines. North of Summit Avenue, there are four parcels zoned for commercial use, with three different zoning classifications. Two of the commercial structures in this area are multi-tenant buildings with large front setbacks and parking in the front of the building. This study is recommending that these parcels be rezoned to T2, which would make these buildings nonconforming regarding both their location on the lot and the location of parking, with implications as previously discussed in this memo. The T2 district also allows less signage than the B2 district for a given lot, meaning a variance for signage might be required to reoccupy a commercial space vacant for a year or more. In B2 and B3 zoning districts the maximum square footage of signage allotted to businesses 2 times the lineal feet of lot frontage. In the traditional neighborhood districts the maximum signage allotted is reduced to 1.5 times the lineal feet of lot frontage. The multi-tenant building at 80 Snelling, for example, currently has 560 square feet of signage at the site. Under the proposed T2 zoning their maximum permitted signage would be reduced to 489 square feet. Parcels adjacent to the station are currently zoned a mix of B2, RM2 and OS (only one parcel). This study is recommending rezoning the parcels nearest the intersection (the old Stoltz Cleaners site, the mixed use and retail buildings at the NE corner, and the shared surface parking along Grand Avenue) to T3, and those are further from the corner of Snelling and Grand to T2. The existing mixed-used building at 32 Snelling Avenue has a floor area ratio of 3.6, which staff is proposing to rezone to T3. Under T3, the building would still exceed the maximum allowed FAR, but it would be closer to conforming. The T3 zoning would allow future redevelopment at up to a 3.0 FAR, matching the scale of the existing mixed use development and nearby institutional structures. New structures would possibly need to be taller to accommodate required parking.

Farther east on Grand Avenue, this study is recommending that parcels zoned RM2 and OS be rezoned to T2. The study also recommends rezoning the church and associated surface parking on the east side of Snelling between Lincoln and Goodrich be rezoned to T2.

Snelling and Saint Clair

The Saint Clair Station is at the southern end of the Macalester Campus. The area is currently characterized by a mix of one-, two-, and three-story commercial and mixed use buildings. South of Saint Clair, this pattern continues on the east side of Snelling to Stanford, where a new one-story commercial building was recently constructed. On the west side, single-family homes fronting intersecting residential streets line Snelling south of the alley between Saint Clair and Berkeley. North of Saint Clair, the Macalester campus is on the west side and single family homes front Snelling beyond the first half-block. At the southwest corner of Snelling and Saint Clair there is a surface parking lot owned by Sweeney Cleaners, but which is also used by other businesses in the area. Cinema Ballroom, just to the east on Saint Clair, uses this lot to meet the off-street parking required by zoning and conditions of its license. If any future redevelopment of the parcel cannot or does not accommodate this parking, Cinema Ballroom would be required to acquire parking at another location or obtain a variance and license modification.

The current zoning of the parcels that are being considered for rezoning in this area are B2, R4, and RM2. This study is recommending that these parcels be rezoned to T3, T2, and T1. Similar to the strategy used at other station areas, the recommendation is that the some of the parcels closest to the BRT station be rezoned to T3. The parcels being recommended for T3 zoning are currently being marketed by a broker and will likely be sold as a package for a single development. This study is recommending that the existing two and three story mixed use buildings (at the NE and SW corners of the intersection) and their adjacent parking lots be rezoned to T2. Two of the parking lots serving these businesses are on separate lots and currently zoned R4 single family, making them (legally) nonconforming as to use. Off street parking facilities are permitted on other lots provided the off street parking facility is in the same or less restrictive zoning district then the principle use the parking lot is intended to serve. Rezoning these lots to T2 along with the principle uses they serve would make them conforming.

Most of the block face south of Stanford on the east side of Snelling is single-family homes fronting Snelling Avenue. The parcels are currently zoned R4, the study is recommending rezoning to T1. The T1 zoning district permits a limited commercial range of non-intrusive commercial uses as well as multifamily uses. Commercial and mixed-use buildings have a maximum floor area ratio of 1.0, which would allow for future commercial or mixed use development that generally compatible in scale with the existing single residential structures. It would also allow for commercial reuse of existing structures, similar to what is seen on Grand Avenue. Multifamily structures in the T1 district are regulated based on lot area per unit, similar to multifamily districts. The T1 district minimum lot area per unit is 1700 square feet, with a density bonus available for providing structured parking. But unlike multifamily districts, there is no maximum building footprint (usually expressed as a percentage of lot area) and there is no minimum lot size requirement beyond the per-unit requirement. As a result, under T1 zoning new smaller-scale multifamily developments (a type of housing which was common in the past but often not seen in current developments) could be built on the existing single family parcels, and with more flexibility in regards to the built form of the structures.

Snelling and Randolph

In the Snelling and Randolph station area there is currently a range of zoning districts that generally correspond to the underlying land use. At this station area this study is proposing to rezone parcels that front both Snelling and Randolph to T1, T2, or T3. Similar to the approach taken at other station areas, staff is proposing to rezone the parcels that are in closest proximity to the intersection of the two mixed use corridors to T3. T3 zoning at this intersection will allow future development to be a greater heights, and possibly higher density. New development with more height would be particularly appropriate at the southwest corner considering the context provided by existing development, notably the 5-story multifamily building at 499 Snelling. On the northwest corner of the intersection this study is proposing to rezone the Walgreens parcel to

T3, while down-zoning the existing single family housing that abuts the Walgreen's parcel to the west and north from RM2 to RT2. If these parcels were to retain RM2 zoning, then the provision that limits height to 25' at the property line abutting the single family residential uses would not apply, and it would be possible to construct a new building with a 45' – 55' wall at the rear and side setback lines as-of-right. Down-zoning the single family residential parcels to RT2 will push the building mass of future development on the Walgreens parcel toward the street, but still allow moderate intensification of residential density on the parcels that currently zoned RM2. To the south along Snelling, this study is recommending that the mix of B3, B2, OS, and RM2 be rezoned to T2. The current mix of zoning is fairly parcel-specific based on the underlying land uses. The notable exception is two legally nonconforming multifamily residential buildings in the B3 zoning district at 535 Snelling and 601 Snelling. These were constructed between 2003 and 2004, under a provision in the code that allowed multifamily residential uses in the B3 district. The provision has since been removed from the code, making the buildings legally nonconforming. Due to the similarity of height and density allowances in the B3 and T2 districts, the buildings are characteristic of the scale of future multifamily residential development that could be built under the proposed T2 zoning.

Snelling and Highland

At Highland Parkway station area this study is proposing rezoning a mix of RM2, OS, B3, B2, and one R4 (one parcel) districts to T2 and T1. The parcel where Gloria Dei church is located (NE corner of Highland Parkway and Snelling, currently zoned R4) is recommended for rezoning to T1. This zoning designation would give the church the flexibility to accommodate accessory office or similar less intense uses that are permitted in the T1 zoning district. The remainder of the parcels fronting Snelling in the area—currently zoned RM2, OS, B2 and B3—are recommended for rezoning to T2. This change would generally be consistent with the underlying land uses, with the exception of the auto repair business, Parkway Auto Care, at 1581 Ford Parkway. Although this use would become legally nonconforming it would be allowed to expand as though it were a conforming use under the provisions of Sec. 62.106 (o). The property-owner initiated rezoning to T3 at 658 Snelling for the construction of The Waters senior housing development could be an indication that rezoning may spur investment in the area.

Recommendations for Future Study

Over the course of the study, a number of zoning strategies that are not included in the recommendations of the study were evaluated. These included an examination of the feasibility of moderately up-zoning of some parcels that are currently zoned R3 and R4, single family residential, to RT1 two-family residential. In some areas, these lots have sufficient area and width allow conversion of single family homes to duplexes without variances if RT1 zoning were in place. This would provide an opportunity to allow for moderate housing production in areas well-served by transit but not immediately on Snelling or a major cross street. It could also act as a transitional zoning district between the more intensive traditional neighborhood zoning districts in the corridors and the single family residential zoning districts in the adjacent neighborhoods. Other potential strategies that were identified during the study but are not recommended at this time include the use of accessory units and reduction in minimum parking requirements along high capacity (LRT and BRT) transit lines. These and other strategies could help to promote more efficient development and accommodate more residential development complimentary to the existing character of established neighborhoods as an alternative to higher-density projects along Snelling and other corridors.

REQUESTED ACTION

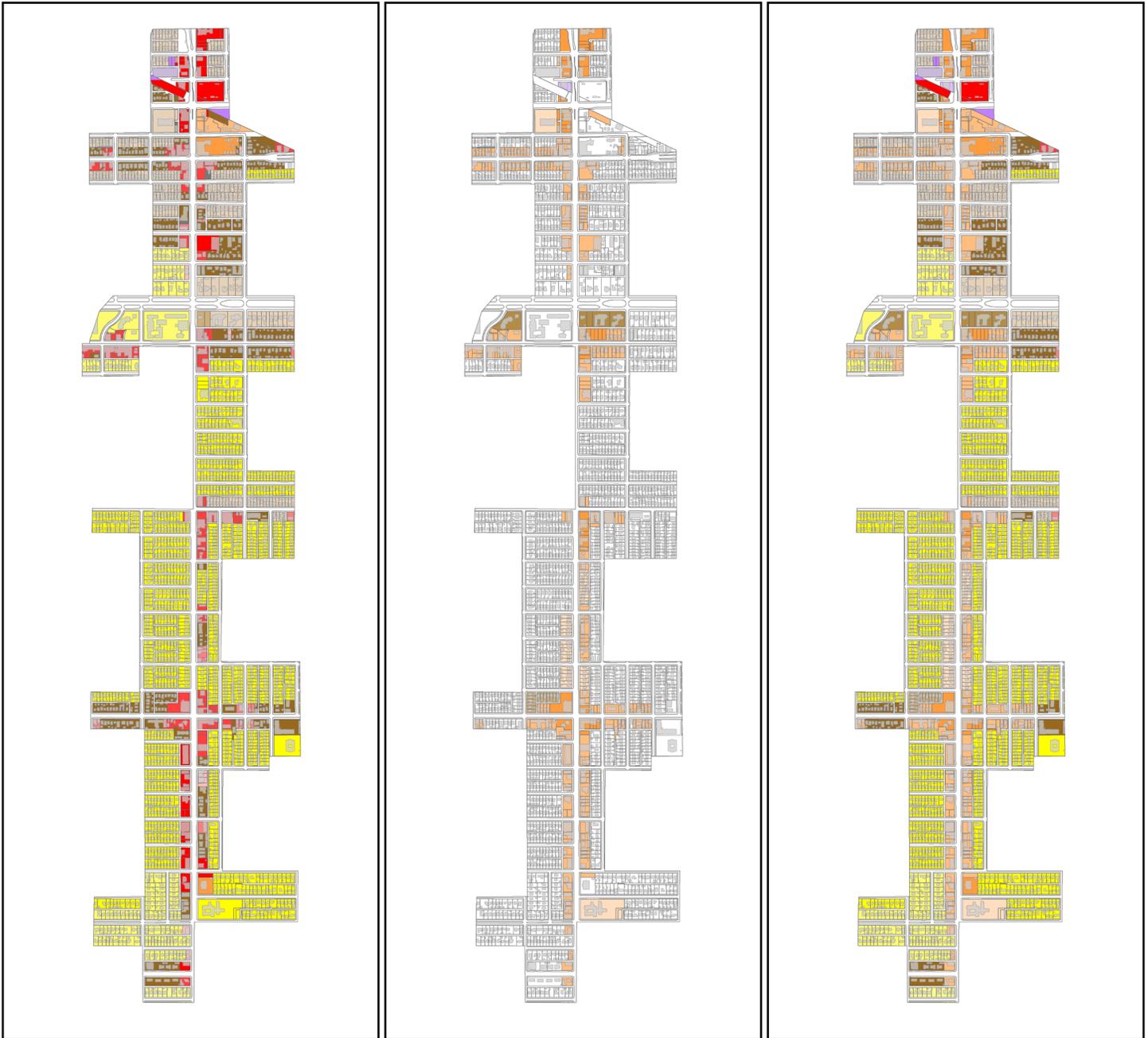
The draft study is provided for discussion only. Staff is targeting the April 12 committee meeting to recommend release of the study for public hearing.

PROPOSED ZONING CHANGES

Before

Proposed Changes

After



Zoning

| | | | | | |
|---|---------------------|---|-----------------------------------|---|----------------------------|
|  | R2 One-Family |  | T1 Traditional Neighborhood |  | B3 General Business |
|  | R3 One-Family |  | T2 Traditional Neighborhood |  | IT Transitional Industrial |
|  | R4 One-Family |  | T3 Traditional Neighborhood |  | I1 Light Industrial |
|  | RT1 Two-Family |  | OS Office-Service |  | VP Vehicular Parking |
|  | RT2 Townhouse |  | B1 Local Business | | |
|  | RM1 Multiple-Family |  | BC Community Business (converted) | | |
|  | RM2 Multiple-Family |  | B2 Community Business | | |

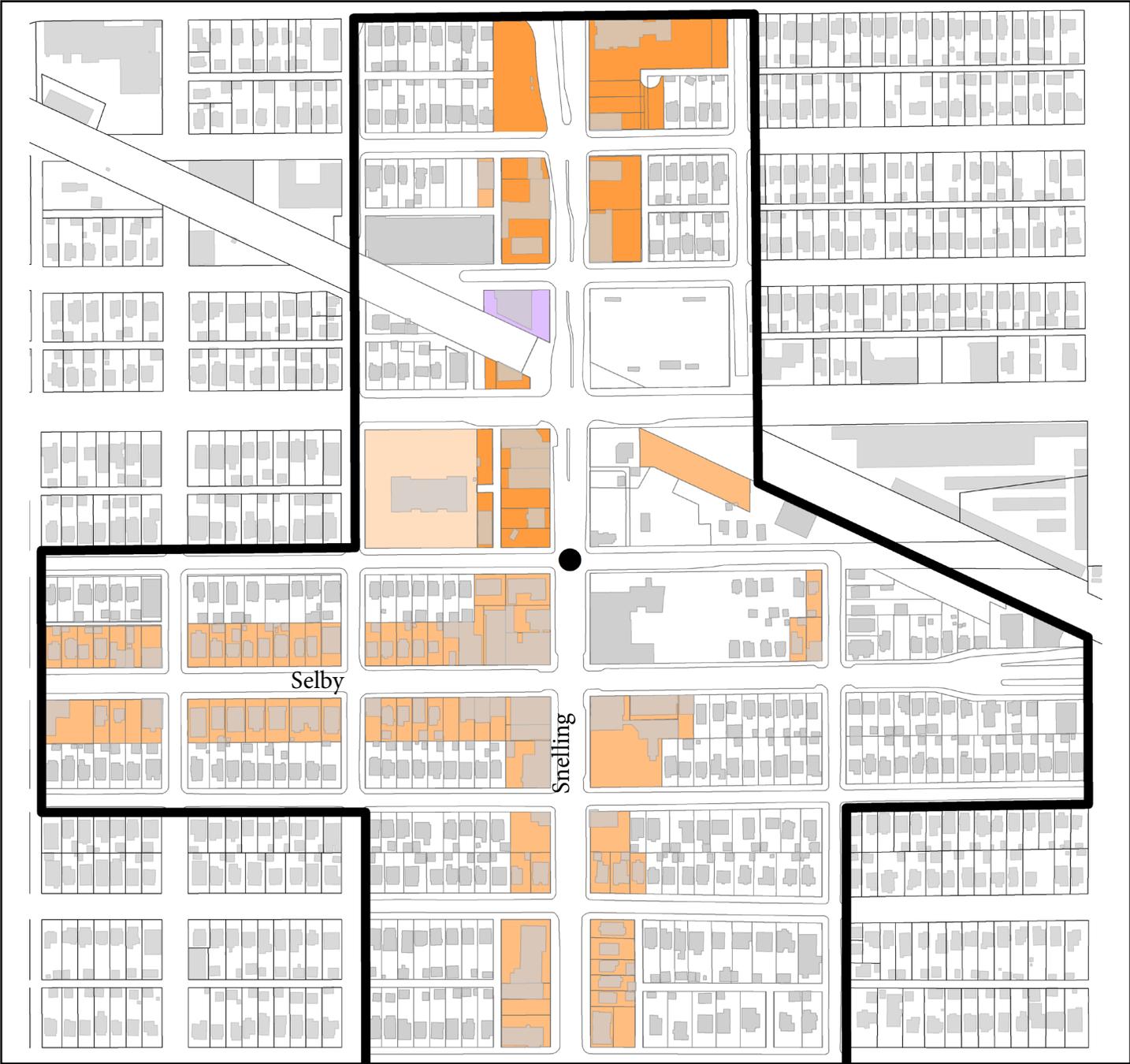
SELBY AND SNELLING STATION AREA - EXISTING ZONING



Zoning

| | | | | | |
|---|---------------------|---|-----------------------------------|---|----------------------------|
|  | R2 One-Family |  | T1 Traditional Neighborhood |  | B3 General Business |
|  | R3 One-Family |  | T2 Traditional Neighborhood |  | IT Transitional Industrial |
|  | R4 One-Family |  | T3 Traditional Neighborhood |  | I1 Light Industrial |
|  | RT1 Two-Family |  | OS Office-Service |  | VP Vehicular Parking |
|  | RT2 Townhouse |  | B1 Local Business | | |
|  | RM1 Multiple-Family |  | BC Community Business (converted) | | |
|  | RM2 Multiple-Family |  | B2 Community Business | | |

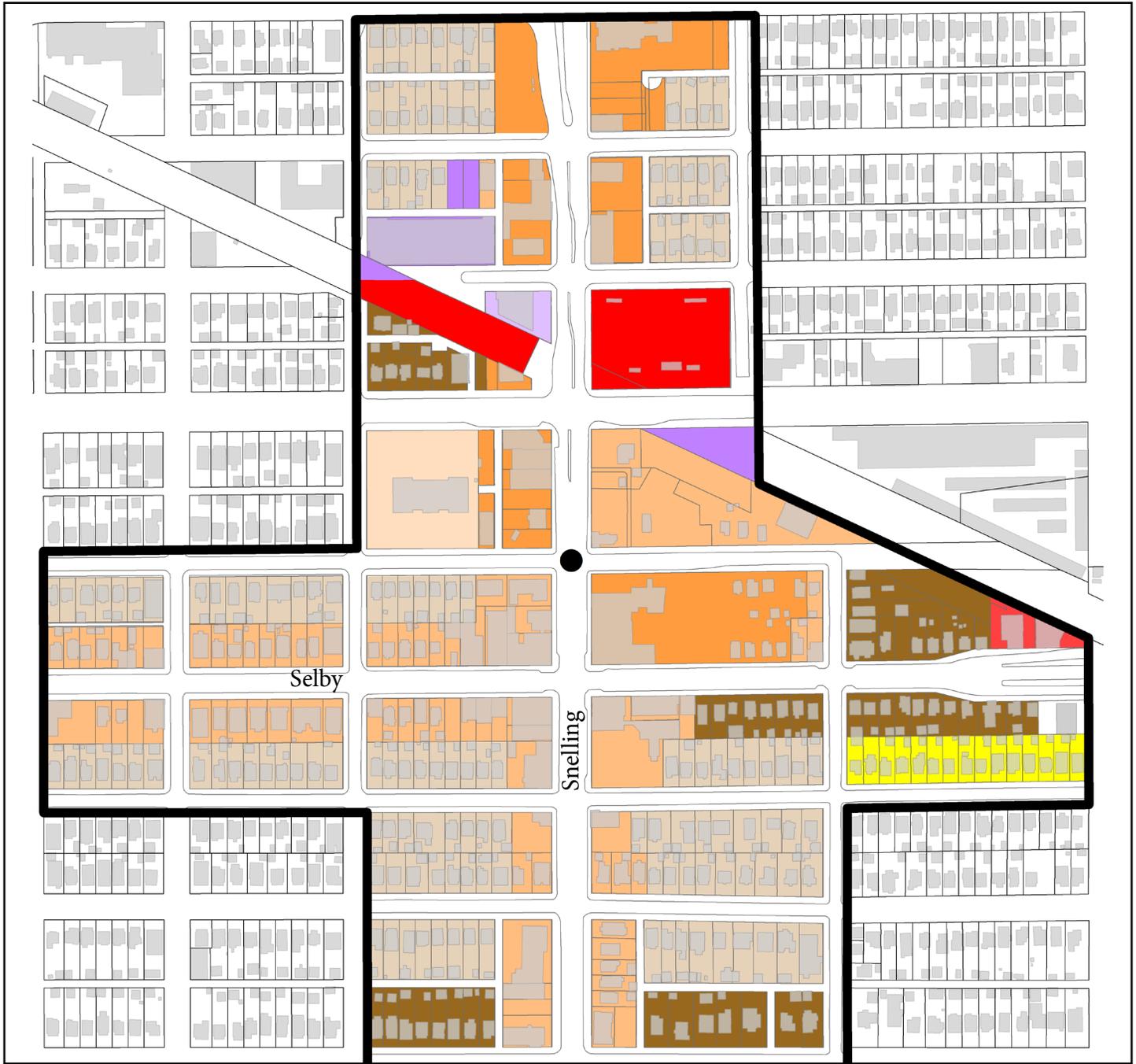
SELBY AND SNELLING STATION AREA - PROPOSED REZONINGS



Zoning

| | | |
|---|---|--|
|  R2 One-Family |  T1 Traditional Neighborhood |  B3 General Business |
|  R3 One-Family |  T2 Traditional Neighborhood |  IT Transitional Industrial |
|  R4 One-Family |  T3 Traditional Neighborhood |  I1 Light Industrial |
|  RT1 Two-Family |  OS Office-Service |  VP Vehicular Parking |
|  RT2 Townhouse |  B1 Local Business | |
|  RM1 Multiple-Family |  BC Community Business (converted) | |
|  RM2 Multiple-Family |  B2 Community Business | |

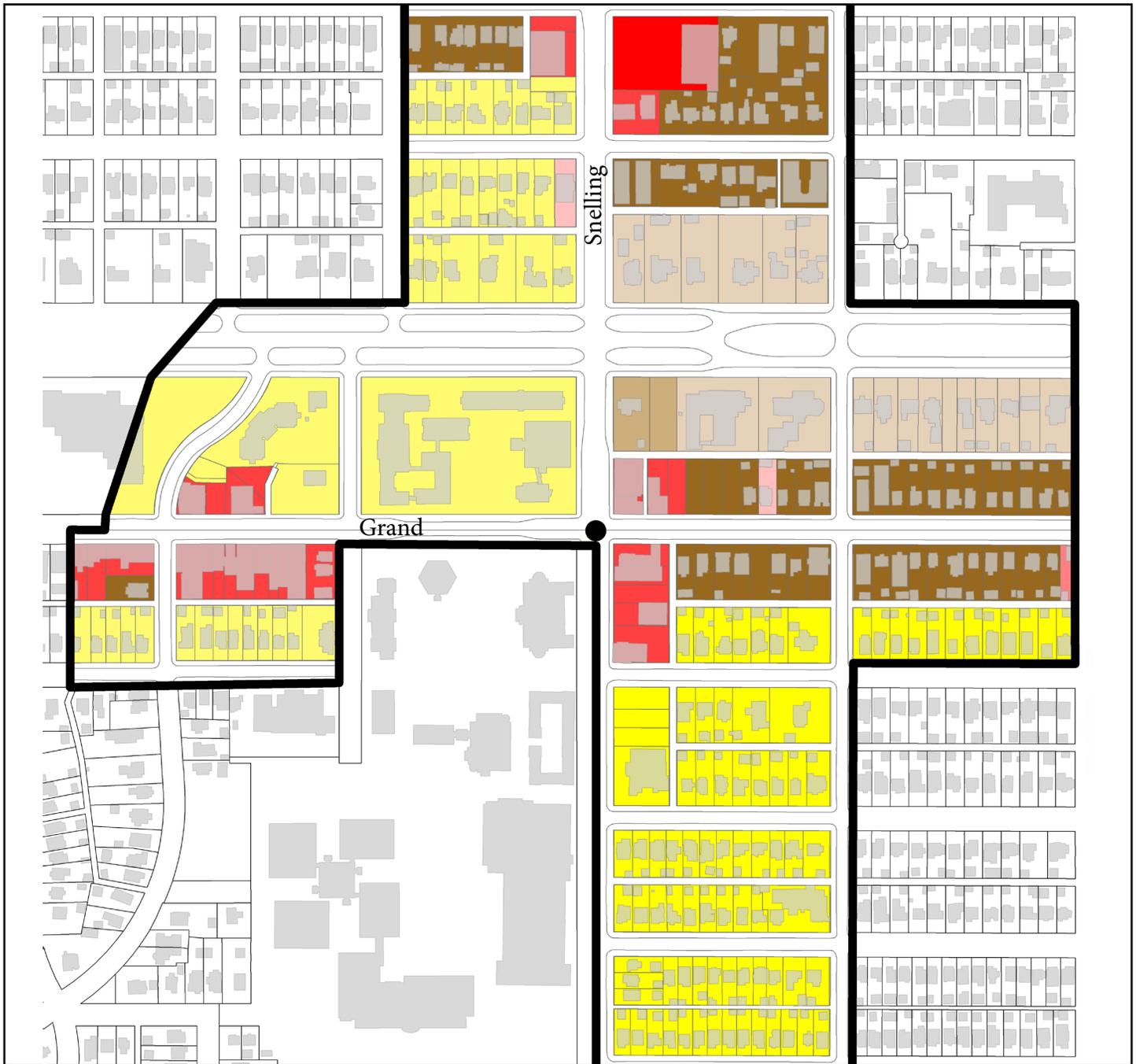
SELBY AND SNELLING STATION AREA - PROPOSED FUTURE ZONING



Zoning

| | | | | | |
|---|---------------------|---|-----------------------------------|---|----------------------------|
|  | R2 One-Family |  | T1 Traditional Neighborhood |  | B3 General Business |
|  | R3 One-Family |  | T2 Traditional Neighborhood |  | IT Transitional Industrial |
|  | R4 One-Family |  | T3 Traditional Neighborhood |  | I1 Light Industrial |
|  | RT1 Two-Family |  | OS Office-Service |  | VP Vehicular Parking |
|  | RT2 Townhouse |  | B1 Local Business | | |
|  | RM1 Multiple-Family |  | BC Community Business (converted) | | |
|  | RM2 Multiple-Family |  | B2 Community Business | | |

GRAND AND SNELLING STATION AREA - EXISTING ZONING



Zoning

| | | | | | |
|---|---------------------|---|-----------------------------------|---|----------------------------|
|  | R2 One-Family |  | T1 Traditional Neighborhood |  | B3 General Business |
|  | R3 One-Family |  | T2 Traditional Neighborhood |  | IT Transitional Industrial |
|  | R4 One-Family |  | T3 Traditional Neighborhood |  | I1 Light Industrial |
|  | RT1 Two-Family |  | OS Office-Service |  | VP Vehicular Parking |
|  | RT2 Townhouse |  | B1 Local Business | | |
|  | RM1 Multiple-Family |  | BC Community Business (converted) | | |
|  | RM2 Multiple-Family |  | B2 Community Business | | |

GRAND AND SNELLING STATION AREA - PROPOSED REZONINGS



Zoning

| | | | | | |
|---|---------------------|---|-----------------------------------|---|----------------------------|
|  | R2 One-Family |  | T1 Traditional Neighborhood |  | B3 General Business |
|  | R3 One-Family |  | T2 Traditional Neighborhood |  | IT Transitional Industrial |
|  | R4 One-Family |  | T3 Traditional Neighborhood |  | I1 Light Industrial |
|  | RT1 Two-Family |  | OS Office-Service |  | VP Vehicular Parking |
|  | RT2 Townhouse |  | B1 Local Business | | |
|  | RM1 Multiple-Family |  | BC Community Business (converted) | | |
|  | RM2 Multiple-Family |  | B2 Community Business | | |

GRAND AND SNELLING STATION AREA - PROPOSED FUTURE ZONING



Zoning

| | | | | | |
|---|---------------------|---|-----------------------------------|---|----------------------------|
|  | R2 One-Family |  | T1 Traditional Neighborhood |  | B3 General Business |
|  | R3 One-Family |  | T2 Traditional Neighborhood |  | IT Transitional Industrial |
|  | R4 One-Family |  | T3 Traditional Neighborhood |  | I1 Light Industrial |
|  | RT1 Two-Family |  | OS Office-Service |  | VP Vehicular Parking |
|  | RT2 Townhouse |  | B1 Local Business | | |
|  | RM1 Multiple-Family |  | BC Community Business (converted) | | |
|  | RM2 Multiple-Family |  | B2 Community Business | | |

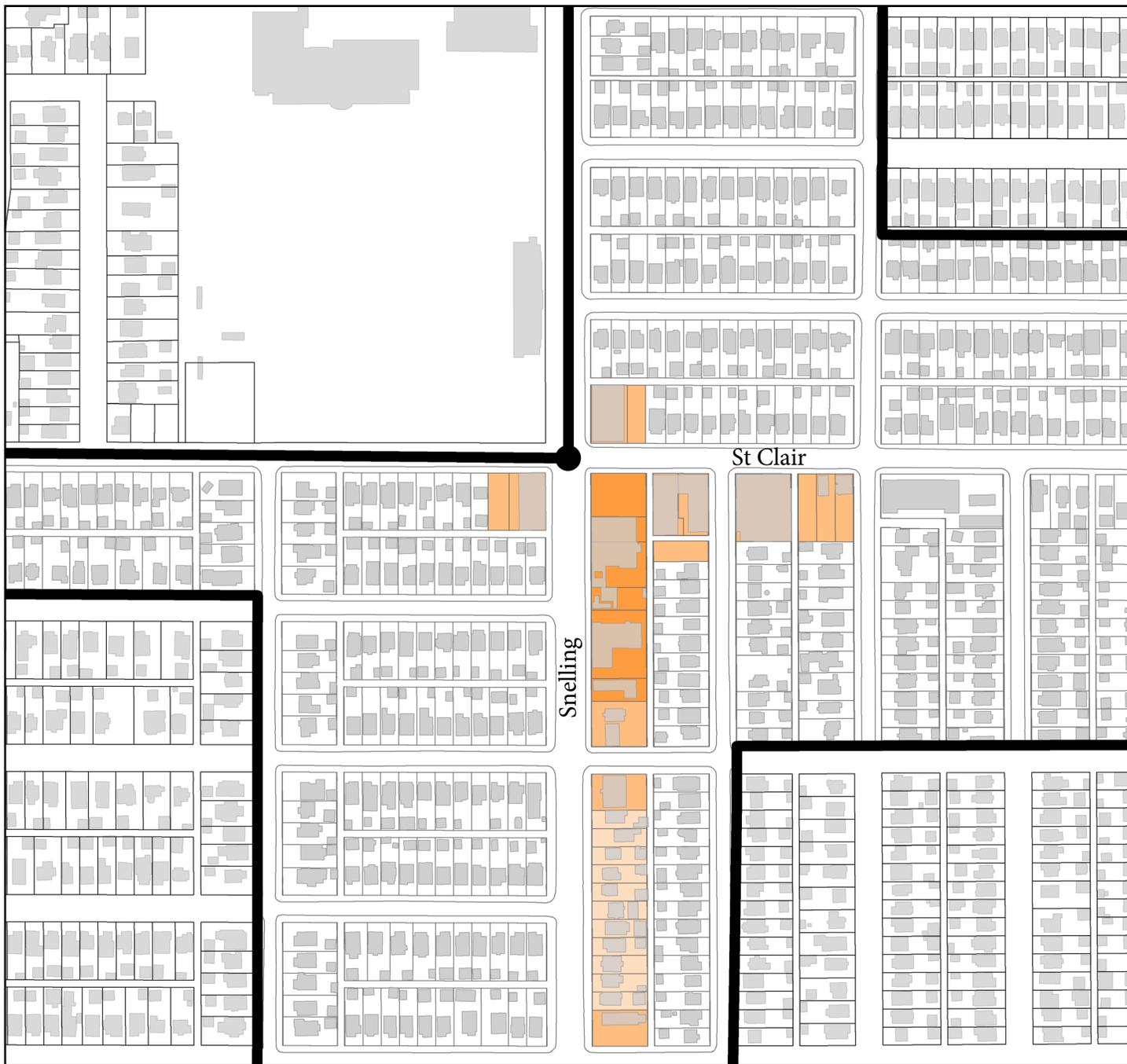
SAINT CLAIR AND SNELLING STATION AREA - EXISTING ZONING



Zoning

| | | | | | |
|---|---------------------|---|-----------------------------------|---|----------------------------|
|  | R2 One-Family |  | T1 Traditional Neighborhood |  | B3 General Business |
|  | R3 One-Family |  | T2 Traditional Neighborhood |  | IT Transitional Industrial |
|  | R4 One-Family |  | T3 Traditional Neighborhood |  | I1 Light Industrial |
|  | RT1 Two-Family |  | OS Office-Service |  | VP Vehicular Parking |
|  | RT2 Townhouse |  | B1 Local Business | | |
|  | RM1 Multiple-Family |  | BC Community Business (converted) | | |
|  | RM2 Multiple-Family |  | B2 Community Business | | |

SAINT CLAIR AND SNELLING STATION AREA - PROPOSED REZONINGS



Zoning

| | | |
|---|---|--|
|  R2 One-Family |  T1 Traditional Neighborhood |  B3 General Business |
|  R3 One-Family |  T2 Traditional Neighborhood |  IT Transitional Industrial |
|  R4 One-Family |  T3 Traditional Neighborhood |  I1 Light Industrial |
|  RT1 Two-Family |  OS Office-Service |  VP Vehicular Parking |
|  RT2 Townhouse |  B1 Local Business | |
|  RM1 Multiple-Family |  BC Community Business (converted) | |
|  RM2 Multiple-Family |  B2 Community Business | |

SAINT CLAIR AND SNELLING STATION AREA - PROPOSED FUTURE ZONING



Zoning

| | | | | | |
|---|---------------------|---|-----------------------------------|---|----------------------------|
|  | R2 One-Family |  | T1 Traditional Neighborhood |  | B3 General Business |
|  | R3 One-Family |  | T2 Traditional Neighborhood |  | IT Transitional Industrial |
|  | R4 One-Family |  | T3 Traditional Neighborhood |  | I1 Light Industrial |
|  | RT1 Two-Family |  | OS Office-Service |  | VP Vehicular Parking |
|  | RT2 Townhouse |  | B1 Local Business | | |
|  | RM1 Multiple-Family |  | BC Community Business (converted) | | |
|  | RM2 Multiple-Family |  | B2 Community Business | | |

RANDOLPH AND SNELLING STATION AREA - EXISTING ZONING



Zoning

| | | | | | |
|---|---------------------|---|-----------------------------------|---|----------------------------|
|  | R2 One-Family |  | T1 Traditional Neighborhood |  | B3 General Business |
|  | R3 One-Family |  | T2 Traditional Neighborhood |  | IT Transitional Industrial |
|  | R4 One-Family |  | T3 Traditional Neighborhood |  | I1 Light Industrial |
|  | RT1 Two-Family |  | OS Office-Service |  | VP Vehicular Parking |
|  | RT2 Townhouse |  | B1 Local Business | | |
|  | RM1 Multiple-Family |  | BC Community Business (converted) | | |
|  | RM2 Multiple-Family |  | B2 Community Business | | |

RANDOLPH AND SNELLING STATION AREA - PROPOSED REZONINGS



Zoning

| | | | | | |
|---|---------------------|---|-----------------------------------|---|----------------------------|
|  | R2 One-Family |  | T1 Traditional Neighborhood |  | B3 General Business |
|  | R3 One-Family |  | T2 Traditional Neighborhood |  | IT Transitional Industrial |
|  | R4 One-Family |  | T3 Traditional Neighborhood |  | I1 Light Industrial |
|  | RT1 Two-Family |  | OS Office-Service |  | VP Vehicular Parking |
|  | RT2 Townhouse |  | B1 Local Business | | |
|  | RM1 Multiple-Family |  | BC Community Business (converted) | | |
|  | RM2 Multiple-Family |  | B2 Community Business | | |

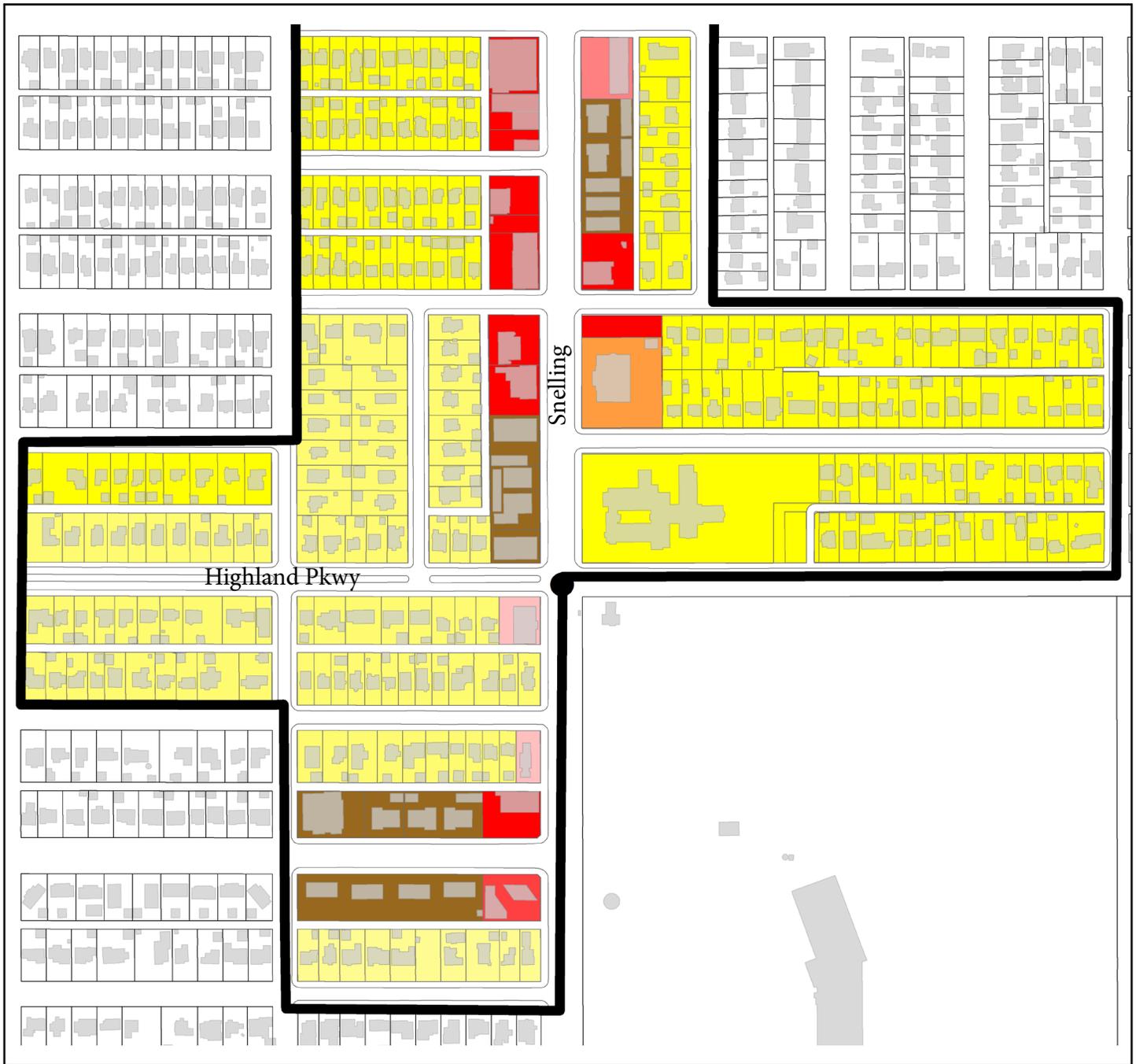
RANDOLPH AND SNELLING STATION AREA - PROPOSED FUTURE ZONING



Zoning

- | | | |
|---|---|--|
|  R2 One-Family |  T1 Traditional Neighborhood |  B3 General Business |
|  R3 One-Family |  T2 Traditional Neighborhood |  IT Transitional Industrial |
|  R4 One-Family |  T3 Traditional Neighborhood |  I1 Light Industrial |
|  RT1 Two-Family |  OS Office-Service |  VP Vehicular Parking |
|  RT2 Townhouse |  B1 Local Business | |
|  RM1 Multiple-Family |  BC Community Business (converted) | |
|  RM2 Multiple-Family |  B2 Community Business | |

HIGHLAND AND SNELLING STATION AREA - EXISTING ZONING



Zoning

| | | |
|---|---|--|
|  R2 One-Family |  T1 Traditional Neighborhood |  B3 General Business |
|  R3 One-Family |  T2 Traditional Neighborhood |  IT Transitional Industrial |
|  R4 One-Family |  T3 Traditional Neighborhood |  I1 Light Industrial |
|  RT1 Two-Family |  OS Office-Service |  VP Vehicular Parking |
|  RT2 Townhouse |  B1 Local Business | |
|  RM1 Multiple-Family |  BC Community Business (converted) | |
|  RM2 Multiple-Family |  B2 Community Business | |

HIGHLAND AND SNELLING STATION AREA - PROPOSED REZONINGS



Zoning

- | | | | | | |
|---|---------------------|---|-----------------------------------|---|----------------------------|
|  | R2 One-Family |  | T1 Traditional Neighborhood |  | B3 General Business |
|  | R3 One-Family |  | T2 Traditional Neighborhood |  | IT Transitional Industrial |
|  | R4 One-Family |  | T3 Traditional Neighborhood |  | I1 Light Industrial |
|  | RT1 Two-Family |  | OS Office-Service |  | VP Vehicular Parking |
|  | RT2 Townhouse |  | B1 Local Business | | |
|  | RM1 Multiple-Family |  | BC Community Business (converted) | | |
|  | RM2 Multiple-Family |  | B2 Community Business | | |

HIGHLAND AND SNELLING STATION AREA - PROPOSED FUTURE ZONING



Zoning

| | | |
|---|---|--|
|  R2 One-Family |  T1 Traditional Neighborhood |  B3 General Business |
|  R3 One-Family |  T2 Traditional Neighborhood |  IT Transitional Industrial |
|  R4 One-Family |  T3 Traditional Neighborhood |  I1 Light Industrial |
|  RT1 Two-Family |  OS Office-Service |  VP Vehicular Parking |
|  RT2 Townhouse |  B1 Local Business | |
|  RM1 Multiple-Family |  BC Community Business (converted) | |
|  RM2 Multiple-Family |  B2 Community Business | |