



CITY OF SAINT PAUL
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DATE: July 15, 2020

TO: Planning Commission

FROM: Comprehensive & Neighborhood Planning Committee

RE: RM Zoning Study

ISSUES

The current housing affordability crisis has generated interest in amending zoning regulations so new housing units can be produced in Saint Paul in a way that aligns with our plans for growth. The Saint Paul 2030 Comprehensive Plan, in Strategy LU-1.3, specifically calls for studying the RM multi-family zoning districts to determine how they can accommodate more intense residential development. Likewise, the Saint Paul 2040 Comprehensive Plan, to be adopted soon, calls for encouraging transit-supportive density (Policy LU-1), using zoning to respond to social conditions (Policy LU-7) such as the housing affordability crisis, ensuring that zoning supports environmentally and economically efficient land use (Policy LU-8), reducing the amount of land devoted to off-street parking (Policy LU-14), and supporting the development of housing options. Most regulations applying to the RM zoning districts were enacted decades ago and may not reflect these modern policies.

Additionally, over recent years there has been neighborhood interest in rezoning corridors to Traditional Neighborhood (T) districts to enjoy the benefits of transit- and pedestrian-oriented form. However, given that some areas that could benefit from transit- and pedestrian-oriented form are not necessarily desired to have the mix of uses provided in T districts, it makes sense to consider whether the RM districts, which are primarily residential, can provide similar form via their dimensional standards. A more transit- and pedestrian-oriented residential district could be desirable in many places as we plan for increased density along new and improved transit lines.

BACKGROUND

Due to its length and complexity, the background section is broken down into several subsections:

- Existing RM Zoning;
- Differences in Uses: RM vs. T;
- Differences in Dimensional Standards: RM vs. T;
- Examples of Potential Change to Existing RM-Zoned Areas;
- Potential New RM Zoning; and

- Recent Traditional Neighborhood Residential Example

Existing RM Zoning

The RM zoning districts, including RM1 Low-Density Multiple-Family Residential District, RM2 Medium-Density Multiple-Family Residential District, and RM3 High-Rise Multiple-Family Residential District, are defined and regulated in Zoning Code Article 66.200 Residential Districts, including intent statements for each district.

The RM1 District is intended to provide an environment of predominantly one- and two-family, townhouse and lower-density multiple-family dwelling structures, along with civic and institutional uses, public services and utilities that serve residents in the district, to provide for a variety of housing needs, and to serve as zones of transition between less restricted districts and more restricted districts.

The RM2 District is intended to provide for more extensive areas of multiple-family residential development and a variety of congregate living arrangements, as well as uses that serve the needs of the multiple-family residential districts. It is intended to provide for comprehensive development of multiple-family uses and a balance of population concentration near major thoroughfares, transit, and related facilities.

The RM3 District is intended to provide sites for high density multiple-dwelling structures adjacent to high-frequency transit service and high traffic generators commonly found in the proximity of major shopping centers and areas abutting major thoroughfares and expressways. It is also designed to serve the residential needs of persons desiring apartment-type accommodations with central services as opposed to the residential patterns found in the RM1 and RM2 multiple-family residential districts. The high-rise nature of the district is provided to allow for greater density with lower coverage, which will in turn result in more open space.

The RM1, RM2, and RM3 intent statements may need revising in conjunction with any code amendments that impact how and where they would be used.

There is much more RM2 zoning than RM1 or RM3 zoning in Saint Paul. There are 4,077 parcels zoned RM2, totaling 1,967 acres, compared with 1,182 RM1 parcels totaling 612 acres and 88 RM3 parcels totaling 148 acres. Many of the RM3 parcels contain apartment towers constructed in the 1960s and 1970s that are placed in a park-like setting and owned by the St. Paul Public Housing Agency. RM1 and RM2 exist in a wider variety of situations.

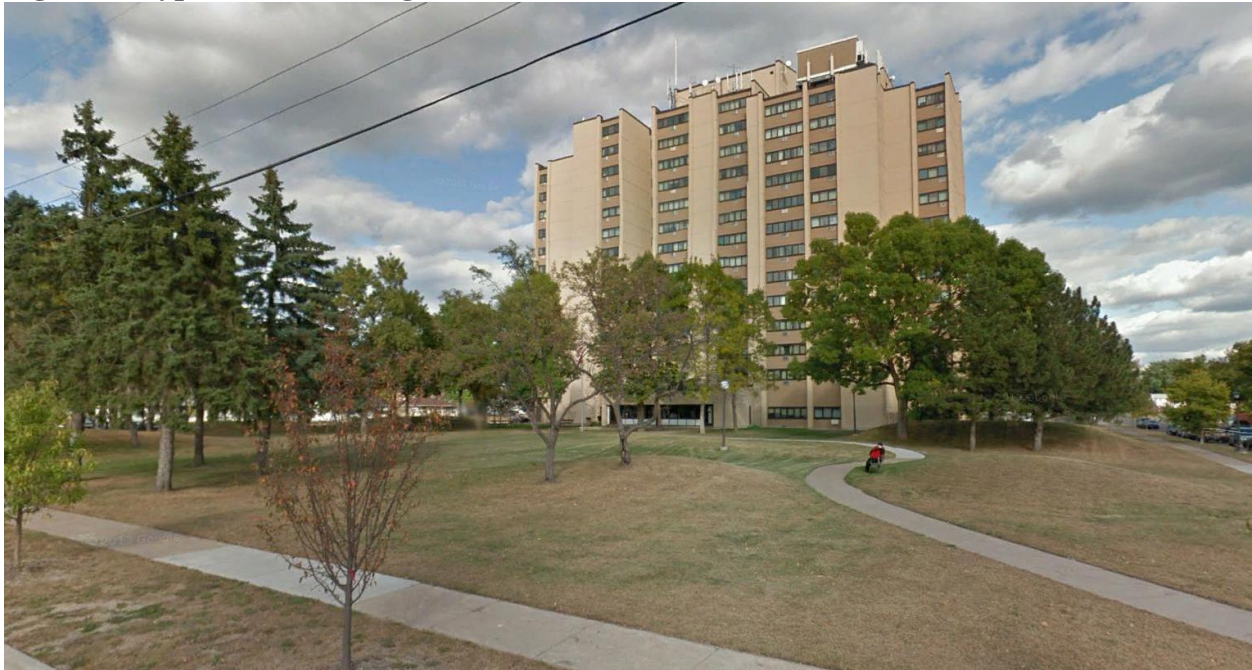
Figure 1: RM1-zoned properties. The top three photos below illustrate the most common settings in the RM1 district, while the fourth shows clustered single-family near I-94 in Summit-University and the fifth shows small-scale, multi-family among single-family residences (all zoned RM1) in West Seventh.



Figure 2: RM2-zoned properties. RM2 areas include many mid-sized multi-family buildings, larger suburban-style complexes, and single-family land uses, such as the variety shown below.



Figure 3: Typical RM3 setting (1743 Iowa Ave E.)



Differences in Uses: RM vs. T

The RM districts primarily permit residences, parks, libraries, schools, and churches. Other permitted uses include day care, bed and breakfasts, and certain agriculture, farmers markets, and cellular antennas. The T districts permit the same uses as the RM districts, plus a wide variety of additional commercial and institutional uses, such as offices, medical clinics, banks, coffee shops, service businesses, and colleges. The T2-T4 districts additionally permit restaurants, bars, health clubs, and general retail, among other uses. Certain other uses are permitted in some of the T districts with a conditional use permit, such as drive-throughs in T2, auto service stations (gas stations) in T2 or T3, and auto body shops in T4.

Differences in Dimensional Standards: RM vs. T

The T districts were created in 2004 to foster the development and growth of compact, pedestrian-oriented urban villages with a compatible mix of commercial and residential uses, new development in proximity to major transit streets, and additional choices in housing. The T districts are regulated differently from other districts, including RM districts, in order to promote pedestrian-oriented form and to encourage, rather than deter, a mix of uses. The following subsections address how RM district dimensional standards differ from T districts with regard to multi-family residential buildings.

Density

For sites without structured parking, RM1 has a minimum lot size of 2,000 sq. ft. per unit (which equates to about 22 units/acre), RM2's minimum lot size is 1,500 sq. ft. per unit (~29 units/acre), and RM3's minimum lot size is 800 sq. ft. per unit (~54 units/acre).

For sites without structured parking, T1 allows a multi-family residential density of 10-25 units/acre. The density calculations for T2-T4 are more complicated because they are regulated by floor area ratio (FAR) rather than lot area per dwelling unit. FAR is the ratio of gross building floor area to the total site area. For example, a one-story building that takes up half of a site has an FAR of 0.5, a two-story building on half a site has an FAR of 1.0, and a three-story building on half a site has an FAR of 1.5. FAR is not directly tied to the number of units for a multi-family building, so some assumptions must be made to estimate density. For sites without structured parking, T2 permits 0.3-2.0 FAR, T3 permits 0.5-3.0 FAR, and T4 permits 0.5+ FAR (no maximum). Assuming 1,000 sq. ft. units and 15% dedicated to common space, that equates to ~11 to 76 units/acre in T2, ~19 to 114 units/acre in T3, and ~19+ units/acre in T4. Assuming smaller units of 700 sq. ft. with 15% dedicated to common space, that would equate to ~16 to 108 units/acre in T2, ~27 to 162 units/acre in T3, and ~27+ units/acre in T4.

In RM1-RM3 and T1-T2 zoning districts, provision of structured parking allows for density bonuses. In RM1-RM3, the structured parking density bonus is provided by footnote (c) to table 66.231. T1's structured parking density bonus is similar to that in RM1-RM3. T2's maximum FAR can increase from 2.0 to up to 3.0 based on structured parking provision.

Permitted residential densities in RM1-RM3 and T1-T4 zoning districts, using above assumptions, are summarized in the table below.

Figure 4: Existing Permitted Densities (approximate, calculated with assumptions)

Zoning District	Maximum Density* (units/acre)			
	Assuming 1,000 s.f. units		Assuming 700 s.f. units	
	With Surface Parking	With Structured Parking	With Surface Parking	With Structured Parking
RM1	22	31	22	31
RM2	29	48	29	48
RM3	54	218	54	218
T1	25	40	25	40
T2	76	114	108	162
T3	114	114	162	162
T4	no maximum	no maximum	no maximum	no maximum

*Density is often realistically limited by other factors like parking, setbacks, lot coverage, etc., as discussed below.

Height

Buildings have a maximum height of 40 feet or 3 stories in RM1, 50 feet or 5 stories in RM2 (except along certain portions of Grand Avenue), and no maximum in RM3. Buildings generally have a maximum height of 35 feet at the setback line in T1 and T2, 45 feet at the setback line in T3, and 75 feet at the setback line in T4. Among the notable height exceptions for the T districts, building heights are limited to 25 feet at the setback line adjacent to properties zoned RL-RT2, and building heights may exceed the maximums at a 1:1 ratio as stepped back from the setback

lines. Overall, RM3 has the least restricted height among the RM and T districts. Otherwise, the T districts generally permit greater heights, especially on larger sites that allow for more of the building to be stepped back from the setback lines.

Additionally, the T3 and T4 districts have a *minimum* building height of 25 feet. The other T districts and the RM districts do not have minimum heights, although all one-story buildings in T districts are required to “convey an impression of greater height” in order to improve the streetscape environment.

Setbacks

RM districts require larger building setbacks from the property lines than the T districts. Minimum setbacks in all RM districts are generally 25 feet from the front, 9 feet from each of the sides, and 25 feet from the rear. T districts have minimum front setbacks for residential uses of generally 10 feet, along with *maximum* front setbacks of generally 25 feet. T districts generally have minimum side and rear setbacks of 6 feet for building walls containing windows or doors, and no minimum side and rear setbacks when building walls contain no openings.

Lot coverage

The maximum lot coverage for principal buildings in RM districts is 35 percent. There is no maximum lot coverage in T districts.

Parking

In T1-T2 districts, buildings with more than 6 dwelling units may have their residential parking requirement reduced by 25 percent. In T3-T4 districts, all residential uses may have their residential parking requirement reduced by 25 percent. Additionally, in T3-T4 districts, adjacent on-street parking may be used to meet parking requirements. For all T districts, the minimum parking provision is waived within ¼ mile of University Avenue. The RM districts do not have any of these parking reductions.

Design standards

The citywide design standards in Zoning Code Sec. 63.110 (building design standards) and Article 63.300 (off-street parking facility standards and design) apply to both the RM and T districts. Additionally, the T districts have their own design standards in Sec. 66.343 addressing the following topics:

1. land use diversity
2. transitions to lower-density neighborhoods
3. block length
4. compatible rehabilitation and reuse
5. use of established building façade lines
6. buildings anchoring the corner
7. front yard landscaping
8. building façade continuity
9. building façade articulation
10. building height/treatment of 1-story buildings

11. definition of residential entries
12. entrance location
13. door and window openings – minimum and character
14. materials and detailing
15. screening of equipment and service areas
16. interconnected street and alley network
17. on-street parking
18. parking location and design
19. residential garage location
20. parking lot lighting
21. entrance location for transit access
22. street trees
23. sidewalks

Examples of Potential Change to Existing RM-Zoned Areas

The following examples are intended to show plausible, real-world scenarios of how development could play out on sites zoned RM1, RM2, or RM3. They examine the potential for development under current RM zoning regulations and under the equivalent Traditional Neighborhood (T1, T2, T3, or T4) zoning in order to illustrate the limiting factors and inform the impact of potential zoning amendments. They account for some non-zoning constraints, such as minimum drive aisle widths and typical building/unit dimensions, in order to provide realism. However, the numbers are approximate and illustrative only – none of these scenarios has been through a formal site plan review.

478 & 480 Hazel Street North

This 5.07-acre site is zoned RM2 and located two blocks north of a planned Gold Line bus rapid transit station. The existing 3-story residential buildings have 118 units with an unspecified mix of sizes up to 3-bedroom units. For this exercise we will assume there are currently 28 3-bedroom units, 40 2-bedroom units, and 50 1-bedroom units, which equates to a parking requirement of 152 off-street spaces. There are ~191 off-street parking spaces provided, including 43 garages. Lot coverage is 19% by buildings. The maximum density would allow up to 145 units with surface parking and 243 units with structured parking.

Under RM2 standards you could build approximately one new 3-story building with a 5,166-sq. ft. footprint and 19 1-bedroom units that displaces 19 parking spaces (assumes 700 sq. ft. units and 15% common area), continuing to rely only on surface parking. Under T2 standards you could build approximately one new 3-story building with a 10,520-sq. ft. footprint and 39 1-bedroom units that displaces 46 spaces, continuing to rely only on surface parking. The minimum parking requirement, which is reduced by 25% in the T2 district, is the major factor that would allow for the additional 20 units under T2 compared to RM2. Either scenario would likely result in a 25-foot building setback from Hazel Street, which is the existing setback of the parking lot. These scenarios both assume 100% surface parking. See Figures 5, 6, and 7 below.

Provision of structured parking could allow for substantially more residential units, under either RM2 or T2 zoning, due to the structured parking density bonuses. Under T2 standards, a 2-story, 100-space, freestanding parking structure (that displaces 54 spaces at a footprint of 14,620 sq. ft.) would allow for a new 15,975-sq. ft. footprint, 4-story residential building with ~79 1-bedroom (700-sq. ft.) units to be constructed, with parking requirements being the main limitation. So, compared to the surface parking scenario, an additional ~40 units could be provided under T2 with structured parking. Under RM2, the parking requirements prevent such a scenario, leaving it with 41.5 parking spaces less than the minimum. Under RM2, a 3-story building with a smaller footprint (~14,545 sq. ft.) and about 54 units could be plausible, leaving the gap from T2 at about 25 units. See Figures 5, 8, & 9 below.

Figure 5: New Units Plausible by Zoning District at 478 Hazel Street North

<u>Scenario</u>	<u># of New Units Plausible</u>
RM2, surface parking only	19
T2, surface parking only	39
RM2, structured parking added	54
T2, structured parking added	79

Figure 6: Potential New 3-Story Residential Building at 478 Hazel Street North Under RM2 Standards

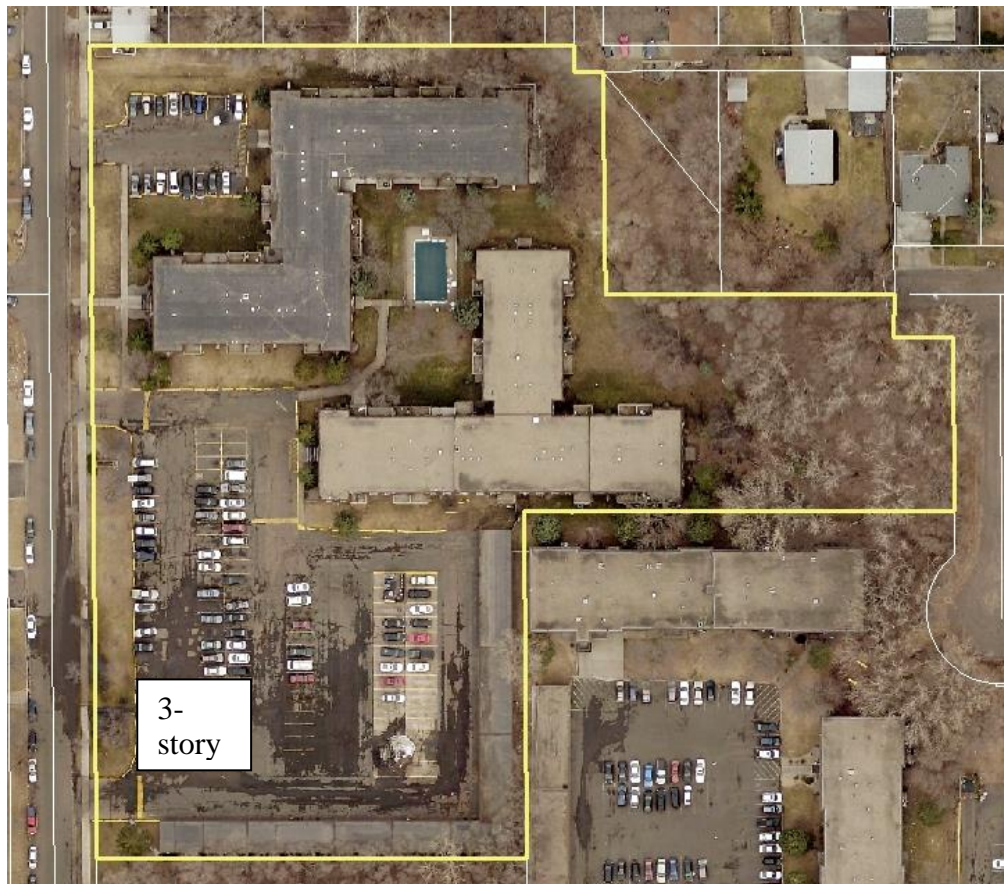


Figure 7: Potential New 3-Story Residential Building at 478 Hazel Street North Under T2 Standards, 100% Surface Parking

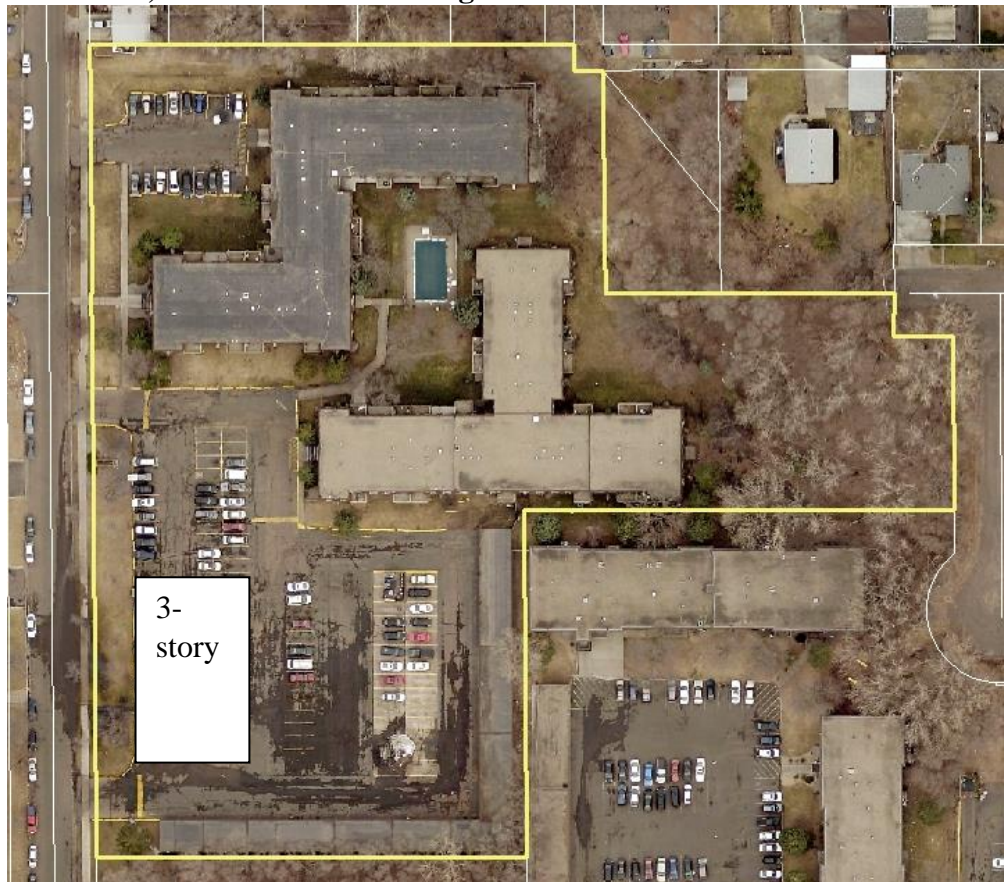


Figure 8: Potential New 3-Story Residential Building at 478 Hazel Street North Under RM2 Standards, With New 100-Space Structured Parking Behind

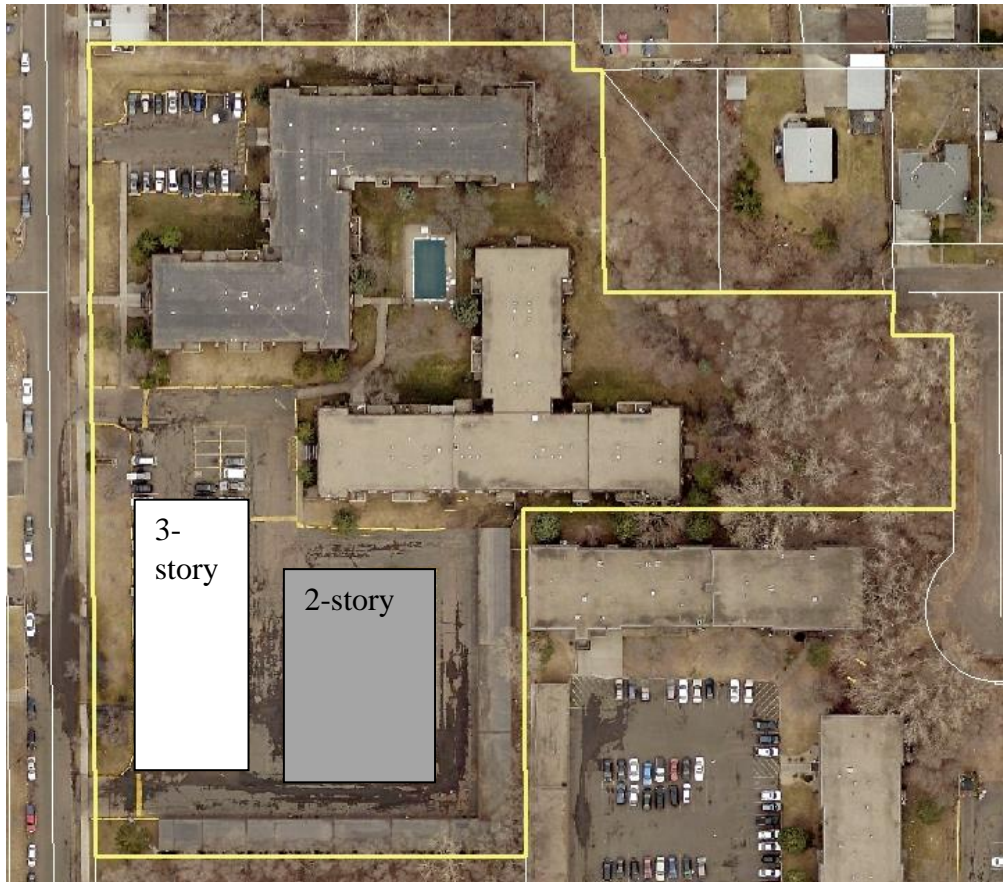
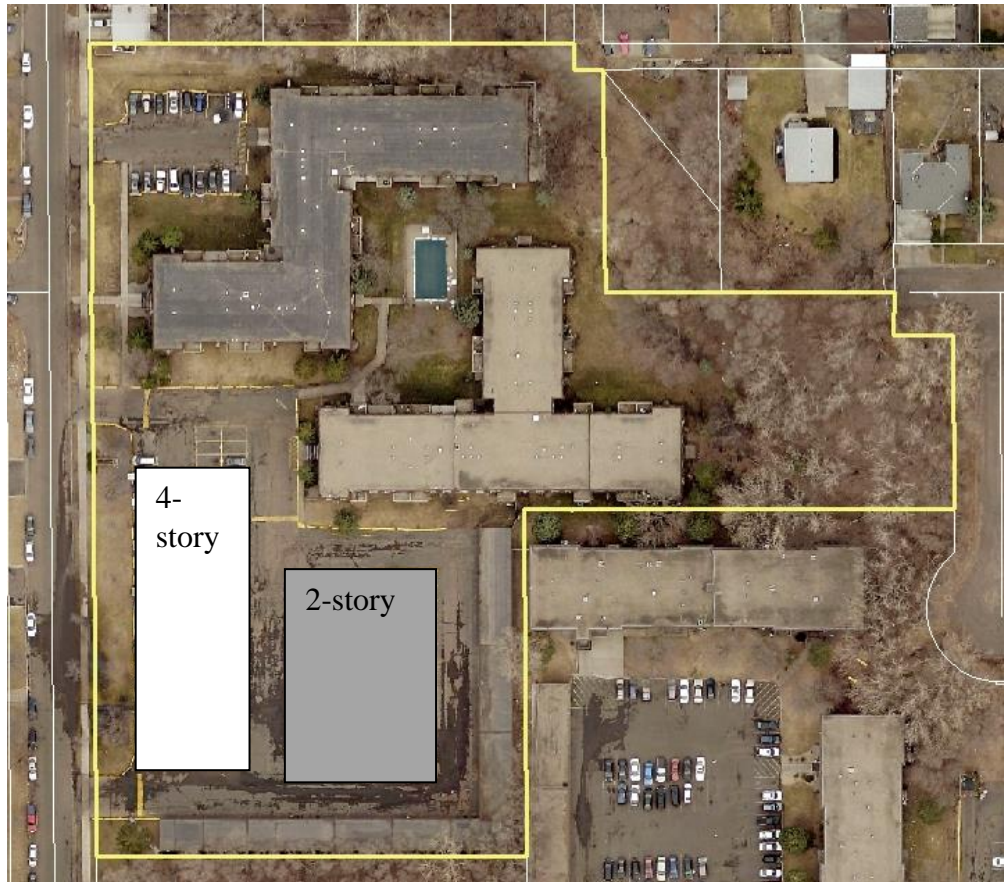


Figure 9: Potential New 4-Story Residential Building at 478 Hazel Street North Under T2 Standards, With New 100-Space Structured Parking Behind



1115 York Avenue/1116 Sims Avenue

This 0.68-acre site is zoned RM2 and located two blocks northwest of a planned Rush Line bus rapid transit station. The existing 2 ½-story residential buildings have 22 units. For this exercise we will assume that all units are 1-bedroom units, which equates to a parking requirement of 22 off-street spaces. There are 18 surface parking spaces provided and the maximum density would allow up to 19 units (with only surface parking) – both indications of a legally nonconforming situation. Aerial photographs show regular parking on the grass and double-parking. Lot coverage is 22%.

Under RM2 standards you could not build any more units on this site. Under T2 standards the parking requirement is only 16.5 spaces, which could allow for a minor building expansion (setbacks not being a limiting factor) to accommodate conversion of two 1-bedroom units to 2-bedroom units. Such an expansion is unlikely to be justified by the construction costs. Therefore, a change from RM2 standards to T2 standards is unlikely to have any impact on this type of situation. See Figures 10 & 11 below.

Figure 10: New Units Plausible by Zoning District at 1115 York Avenue/1116 Sims Avenue

<u>Scenario</u>	<u># of New Units Plausible</u>
RM2	0
T2	0 (convert two 1-bed units to 2-bedroom)

Figure 11: Potential Building Addition at 1115 York Avenue Under T2 Standards



400 Dewey Street

This 0.83-acre site is zoned RM2 and located three blocks south of the Fairview Green Line light rail transit station. The existing 2 ½-story residential building has 35 units, with an unspecified allocation among studios, 1-bedroom and 2-bedroom units. For this exercise we will assume that there are currently 5 2-bedroom units, 24 1-bedroom units, and 6 studios, which equates to a parking requirement of 37 off-street spaces. There are ~40 off-street parking spaces provided. Lot coverage is 22%. The maximum density would allow up to 24 units, which indicates a legally nonconforming situation.

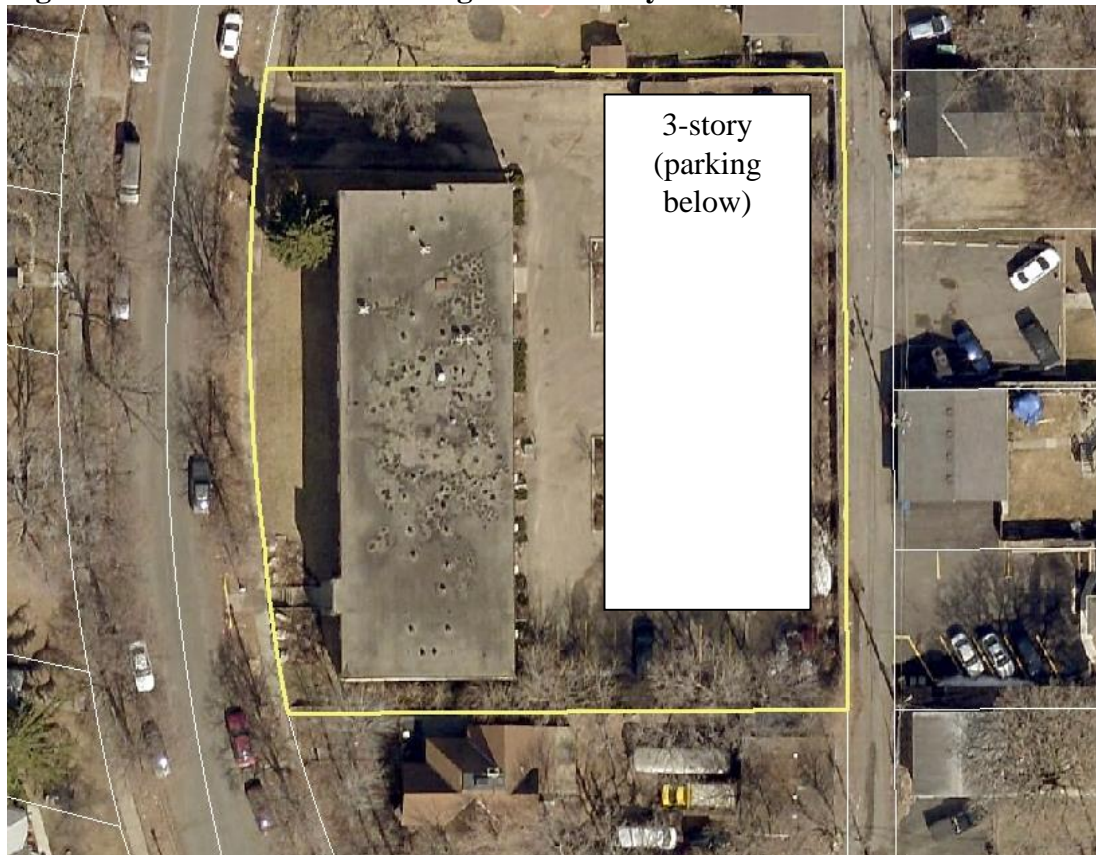
Under RM2 standards you could not build any more units on this site due to the maximum density, and parking minimums are also a limitation. Under T2 standards there is no parking

requirement because it is within ¼ mile of University Avenue, which, along with more relaxed density maximums, would potentially allow for substantially more units. Parking would likely still be provided to meet resident demand, perhaps underground with 3 stories of residential units above that could provide approximately 29 units on an 8,000-sq. ft. footprint. In this example, the FAR is 1.5 which is well under the maximum FAR of 3.0 (when structured parking is provided). T2 has a maximum height of 35 feet at the setback line, but in this case an additional setback of 8 feet allows for heights of 43 feet – plenty for a 3-story building, even if the parking structure is partially above-ground. A limiting factor for any second building here would be provision of adequate Fire Department access to all sides of the structure, which would be determined through site plan review but could conceivably be met by this example. Overall, T2 standards could provide 29 more units here than RM2 standards. See Figures 12 & 13 below.

Figure 12: New Units Plausible by Zoning District at 400 Dewey Street

<u>Scenario</u>	<u># of New Units Plausible</u>
RM2, surface parking only	0
T2, surface parking only	0
RM2, structured parking added	0
T2, structured parking added	29

Figure 13: Potential New Building at 400 Dewey Street Under T2 Standards



432 & 442 Beacon Avenue

This 0.31-acre site is zoned RM2 and located three blocks southwest of the Fairview Green Line light rail transit station. It is comprised of two vacant lots formerly occupied by single-family homes that were demolished by the City in 2014 and 2015. Under RM2 standards the maximum density would allow for up to 9 units with surface parking, or 15 units with structured parking. However, you could only fit a portion of the parking required to max out the density bonus underneath the building, whose footprint is limited to 4,726 sq. ft. by the maximum lot coverage of 35%. Therefore, realistically you could only fit about 11 units on this site under RM2 standards. The maximum lot coverage of 35% is the primary limiting factor, and maximum density is a secondary limiting factor. The minimum rear yard setback could also become limiting compared to T standards. See Figures 14 & 15 below.

Under T2 standards, which have no minimum parking provision due to the proximity to University Avenue, you could build approximately 31 units assuming a 3-story building with 8,550 square foot footprint, with any parking (only to meet market demand) placed in a structure below, that maximizes the site, and 700-sq. ft. units with 15% common space. See Figures 14 & 16. In order to provide surface parking (only to meet market demand) under T2, the building would need to be a similar size to the RM2 scenario (4,726-sq. ft. footprint – see Figure 15), which would allow for about 17 units in a 3-story building. The overall difference between RM2 and T2 in this example is 20 residential units.

Figure 14: New Units Plausible by Zoning District at 432 & 442 Beacon Avenue

<u>Scenario</u>	<u># of New Units Plausible</u>
RM2, surface parking only	9
T2, surface parking only	17
RM2, structured parking added	11
T2, structured parking added	31

**Figure 15: Potential New Building at 432 & 442 Beacon Avenue Under RM2 Standards
(same building footprint whether surface parking or structured parking below)**



Figure 16: Potential New Building at 432 & 442 Beacon Avenue Under T2 Standards



1729 Randolph Avenue

This 0.12-acre site is zoned RM2 and located across the street from the St. Paul Academy and Summit School, and 2 ½ blocks west of an A-Line arterial bus rapid transit station. It is not near a planned or existing transitway. It contains a single-family home – one of the smaller ones on the block that might someday be a target for a teardown and reconstruction for an apartment building. The site is 40 feet wide by 133 feet deep. Including half the adjacent alley, it has an area of 5,720 sq. ft.

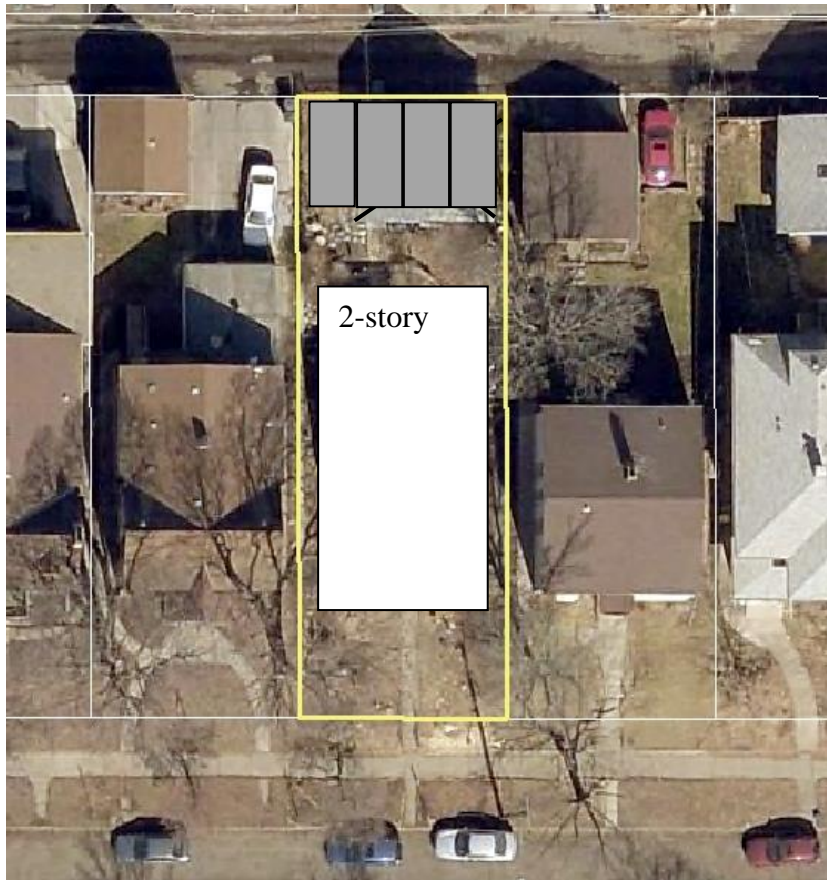
Under RM2 standards, a footnote disallows more than 2 dwelling units on lots less than 9,000 square feet, such as this lot, and RT1 two-family district dimensional standards (which apply to two-family dwellings) require a minimum 6,000-sq. ft., 50-ft. wide lot. Therefore, this building would remain single-family. Even without the footnotes, there are three other standards that would be limiting to a teardown/ reconstruction scenario: (1) maximum density would permit only 3 units to be constructed (or 5 with structured parking), (2) minimum side yard setbacks of 9 feet would limit the building width to 22 feet, and (3) parking, with 2 off-street spaces currently provided and room for a 3rd (or a 4th if garage were demolished). RM2 standards essentially prevent significant change on this site. Due to the lack of potential additional units to pay for construction, structured parking under RM2 is infeasible.

Density and setbacks are not limitations under T2 standards. However, required parking remains a limitation – even tearing down the garage and maximizing alley-loaded parking would yield only 4 spaces, which is enough for 4 1-bedroom units. A 2-story, 4-unit apartment building with surface parking could be built under the standards. The new building could be larger and constructed closer to the property lines than the existing home is. With structured parking, up to 19 residential units could be constructed according to the maximum FAR (and assuming 700 square foot units with 15% common space), but the maximum height, minimum setbacks, and practicalities of maneuvering into underground parking mean an effective limit of 5 residential units (700 square feet each in two stories on a ~2,100-square foot footprint), which is implausible when considering the cost of structured parking. See Figures 17 and 18 below.

Figure 17: New Units Plausible by Zoning District at 1729 Randolph Avenue

<u>Scenario</u>	<u># of New Units Plausible</u>
RM2, surface parking only	1 (ADU to existing, or conversion to duplex)
T2, surface parking only	4
RM2, structured parking added	0
T2, structured parking added	0

Figure 18: Potential New 2-Story Building and Surface Parking at 1729 Randolph Avenue Under T2 Standards



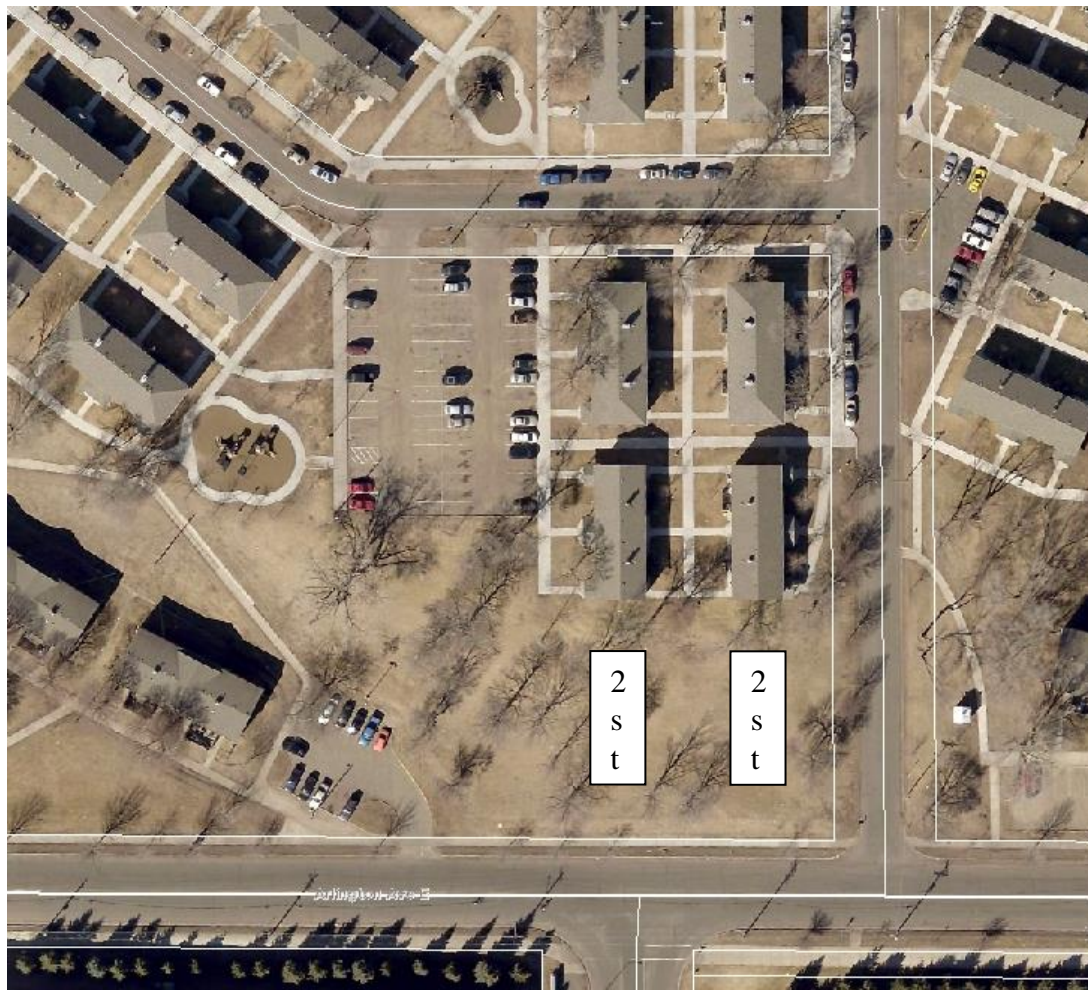
McDonough Homes

This 65-acre site is zoned RM1 and is not near a planned or existing transitway. It includes a multitude of 4-unit and 6-unit, 2-story buildings in a campus-like setting. It is owned by the St. Paul Public Housing Agency. Due to the building configurations, with separate external entrances, it would be difficult to add on to these buildings; the more likely change, dependent on parking availability, would be new buildings constructed in current open areas not located between existing buildings – perhaps up to seven new buildings on the campus. Since the buildings all have 6 or fewer units, T1 zoning would confer no parking standards advantages over RM1 zoning. None of the other RM1 standards (setbacks, lot coverage, etc.) are limiting at this site. Overall, infill construction is equally likely under RM1 or T1 zoning. Maximum density is not a limitation that would incentivize structured parking to get a density bonus. Also, there is space for surface parking that makes even market-driven parking unlikely to be placed in a structure, due to the cost. See Figures 19 & 20.

Figure 19: New Units Plausible by Zoning District at McDonough Homes

<u>Scenario</u>	<u># of New Units Plausible</u>
RM1, surface parking only	6 per new building; ~several dozen overall
T1, surface parking only	6 per new building; ~several dozen overall
RM1, structured parking added	0
T1, structured parking added	0

Figure 20: Potential New Buildings at McDonough Homes Under RM1 or T1 Zoning



401/405 Robie Street East

This 0.45-acre, 69-foot-wide site is zoned RM1 and is not near a planned or existing transitway. It currently contains a single-family home and garage.

Under RM1 zoning, you could construct up to 9 residential units on the property in a building of up to 6,860 sq. ft. footprint, likely two stories, with surface parking. Maximum density is the limiting factor. Parking and setbacks would not be limiting factors. Under T1 zoning, you could

construct up to 11 multi-family residential units with surface parking due to the higher permitted density. Structured parking would allow another 5 to 6 units under either zoning, due to the density bonuses – there is room in the rear yard for such a structure under T1 zoning, but the 35% maximum lot coverage in RM1 would require structured parking to be under the residential building. See Figures 21-25.

Figure 21: New Units Plausible by Zoning District at 401/405 Robie Street East

<u>Scenario</u>	<u># of New Units Plausible</u>
RM1, surface parking only	9
T1, surface parking only	11
RM1, structured parking added	14
T1, structured parking added	17

Figure 22: Potential New Apartment Building and Surface Parking at 401/405 Robie Street East Under RM1 Zoning



Figure 23: Potential New Apartment Building and Surface Parking at 401/405 Robie Street East Under T1 Zoning



Figure 24: Potential New Apartment Building with Structured Parking Below at 401/405 Robie Street East Under RM1 Zoning



Figure 25: Potential New Apartment Building with Structured Parking Behind at 401/405 Robie Street East Under T1 Zoning



325-349 Laurel Avenue

This 1.63-acre site is zoned RM3 and is not near a planned or existing transitway. It is one block southeast of a concentration of restaurants on Selby Avenue. It is owned by the St. Paul Public Housing Agency (SPPHA). It contains 104 1-bedroom apartments (in two connected towers – one 6 stories and one 7 stories) and provides approximately 39 parking spaces. The parking provision of 0.33 spaces per unit meets the requirement for SPPHA-operated and/or elderly housing, but not for other multi-family residences. RM3 maximum density would permit only 88 units, which indicates a legal nonconforming situation. No residential units can be added to the site under RM3 regulations.

Under T3 regulations, you could potentially construct a new SPPHA-operated apartment building in the site's southwestern portion, with underground parking accessed via a new curb cut on the south. The number of units would realistically be limited by the practicalities of good site planning, and not by parking, FAR, height, or any other T3 zoning regulations. For instance, it is unlikely that a significantly taller building would be built immediately south of the 6/7-story existing building, or that all outdoor community space would be eliminated. A plausible scenario is a 37-unit, 6-story building on a footprint of 5,000 square feet. A conditional use permit (CUP) would be required for this amount of height under T3 regulations. It is worth noting that SPPHA buildings do not typically have underground parking. See Figures 26 & 27.

Figure 26: New Units Plausible by Zoning District at 325-349 Laurel Avenue

<u>Scenario</u>	<u># of New Units Plausible</u>
RM3, surface parking only	0
T3, surface parking only	0
RM3, structured parking added	0
T3, structured parking added	37

Figure 27: Potential New 6-Story Building (With Parking Below) at 325-349 Laurel Avenue



1016 & 1020 Grand Avenue

This 0.28-acre site contains two lots, each with a single-family home, and is zoned RM2. It is not located near a planned or existing transitway. The maximum density would allow 8 units with just surface parking or 13 with structured parking. The maximum lot coverage allows for a 4,268-sq. ft. footprint. It is within the East Grand Avenue Overlay District, which provides a maximum building footprint of 25,000 sq. ft. (though the more limiting RM2 standard would

apply), maximum total building floor area of 75,000 sq. ft., and maximum height of 3 stories or 40 feet, plus applies the T2 design standards. Two lots are needed here to get above the 9,000-sq. ft. threshold required in RM2 to allow more than 2 multi-family units. (As you can see on the aerial photo in Figure 26, other multi-family buildings on the north side of this block have been constructed by combining 1 ½ lots to exceed the 9,000-sq. ft. threshold.)

Under RM2 standards, assuming surface parking, you could construct a 3-story building with a 4,268-sq. ft. footprint with 8 1-bedroom units. Most likely the building would be only 2 stories, which would allow for nearly 1,000-sq.ft. units. The 80'-wide combined lot would allow for the required 8 parking spaces off the alley. With structured parking, you could construct a 3-story building on the same footprint (which is the largest possible under the 35% maximum lot coverage) with parking below. However, due to limited room for underground parking on this footprint (as limited by maximum lot coverage), the structured parking bonus here would allow for about 11 units of 850 sq. ft. in size. Under RM2 with solely surface parking, maximum density is the limiting factor for adding residential units. With structured parking under RM2, maximum lot coverage is the primary limiting factor, and maximum density is a secondary factor. See Figures 28, 29, & 30.

Under T2 standards the minimum parking requirement is the main limiting factor, with the maximum height of 35 feet being a design factor for 3-story buildings. With a 12-space parking lot off the alley, you could construct 16 1-bedroom dwelling units. Assuming 6' side yard setbacks and a 25' front yard setback (aligns with most of the block), along with 15% dedicated to interior common space, a maximized apartment building would result in 16 units of 719 sq. ft. each, on a 4,410-sq. ft. footprint. See Figures 28 and 31.

Provision of structured parking in this scenario could increase the number of units under T2 standards, though the competition for space between apartment and parking, plus the maximum building height constraints would compel the parking to be fully underground. Assuming a 15' rear yard setback to allow for ramping space into an underground parking structure, 15% dedicated to interior common space, and 700 sq. ft. 1-bedroom units, a maximized apartment building would be 3 stories with a 7,840-sq. ft. footprint and 30 units (and 22 underground parking spaces). The overall difference between what you could build under T2 standards and RM2 standards is 19 residential units. See Figures 28 and 32.

Figure 28: New Units Plausible by Zoning District at 1016 & 1020 Grand Avenue

<u>Scenario</u>	<u># of New Units Plausible</u>
RM2, surface parking only	8
T2, surface parking only	16
RM2, structured parking added	11
T2, structured parking added	30

Figure 29: Potential New 2-Story Apartment Building and Surface Parking at 1016 & 1020 Grand Avenue Under RM2 Zoning



Figure 30: Potential New 2-Story Apartment Building (With Parking Below) at 1016 & 1020 Grand Avenue Under RM2 Zoning



Figure 31: Potential New 3-Story Apartment Building and Surface Parking at 1016 & 1020 Grand Avenue Under T2 Zoning

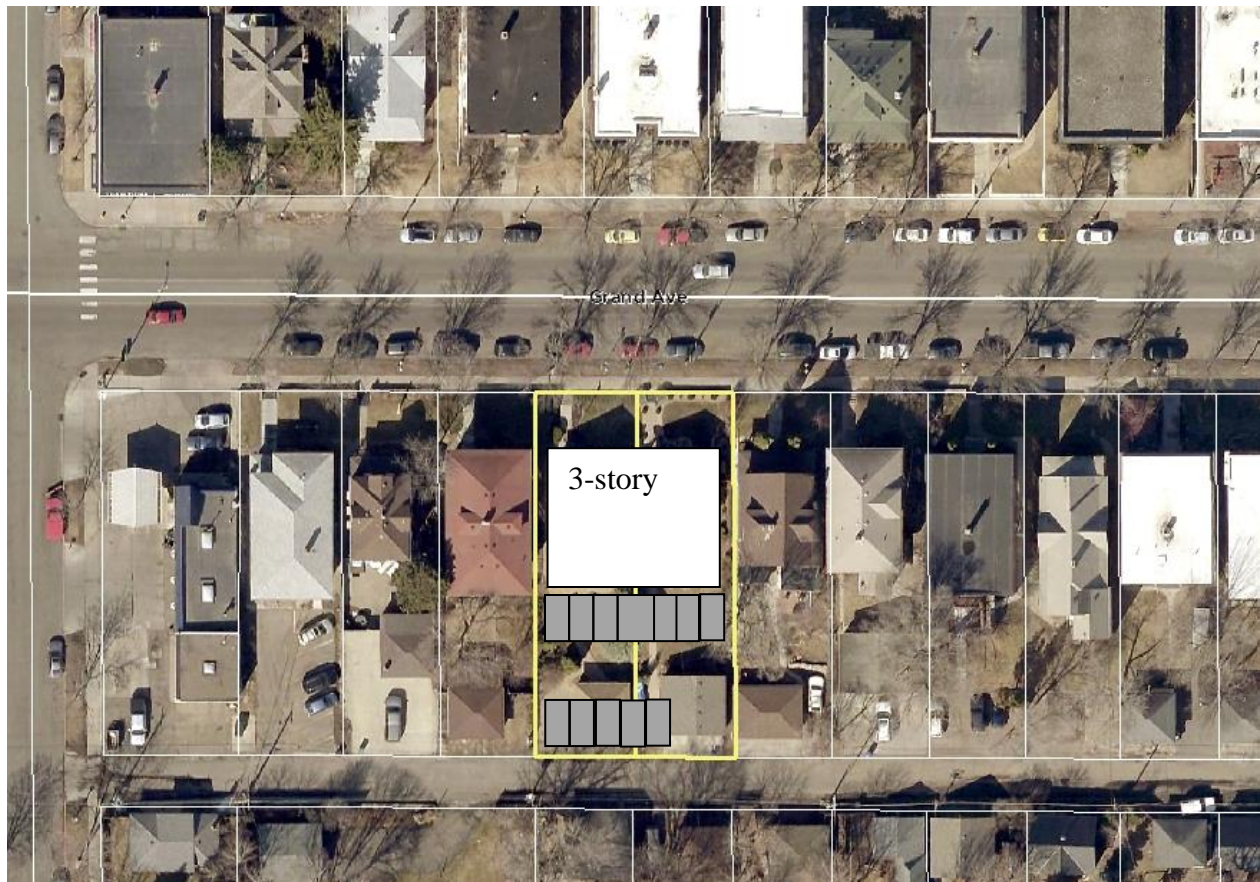


Figure 32: Potential New 3-Story Apartment Building (With Parking Below) at 1016 & 1020 Grand Avenue Under T2 Zoning



Summary of Examples of Potential Change to Existing RM-Zoned Areas

The table below summarizes the limiting factors to development under RM regulations compared to T regulations in the examples above.

Figure 33: Limiting Factors to Development Under RM Regulations Compared to T Regulations

	Maximum Density	Minimum Parking	Max. Lot Coverage	Maximum Height	Minimum Setbacks	9,000 s.f. minimum
478 Hazel		★				
1115 York*						
400 Dewey	★	★				
432 Beacon	☆		★		☆	
1729 Randolph	☆	☆			☆	★
McDonough Homes*						
401 Robie	★		^		^	
325 Laurel	★					
1016 Grand	★		★	^		

Key: ★ = major limiting factor to new units, ☆ = contributing factor, ^ = minor design factor

* No significant difference in limitations under RM vs. T.

Potential New RM Zoning**869 & 875 Clark Street**

This 0.3-acre site contains two vacant lots, each zoned RT1, and is located three blocks north of a planned Rush Line bus rapid transit station. Its proximity to a planned transitway makes it a potential target for adding multi-family housing, but its location among strictly residential properties makes it a poor fit for T1 or T2 uses. Therefore, RM1 or RM2 zoning might be a logical fit at this location.

Figure 34: Potential Site to Rezone to RM1 or RM2 (869 & 875 Clark Street)



Recent Traditional Neighborhood Residential Example

The following example, although mixed-use, could inform new RM zoning regulations as applied to hot market areas with excellent public transit service.

455 Snelling Avenue

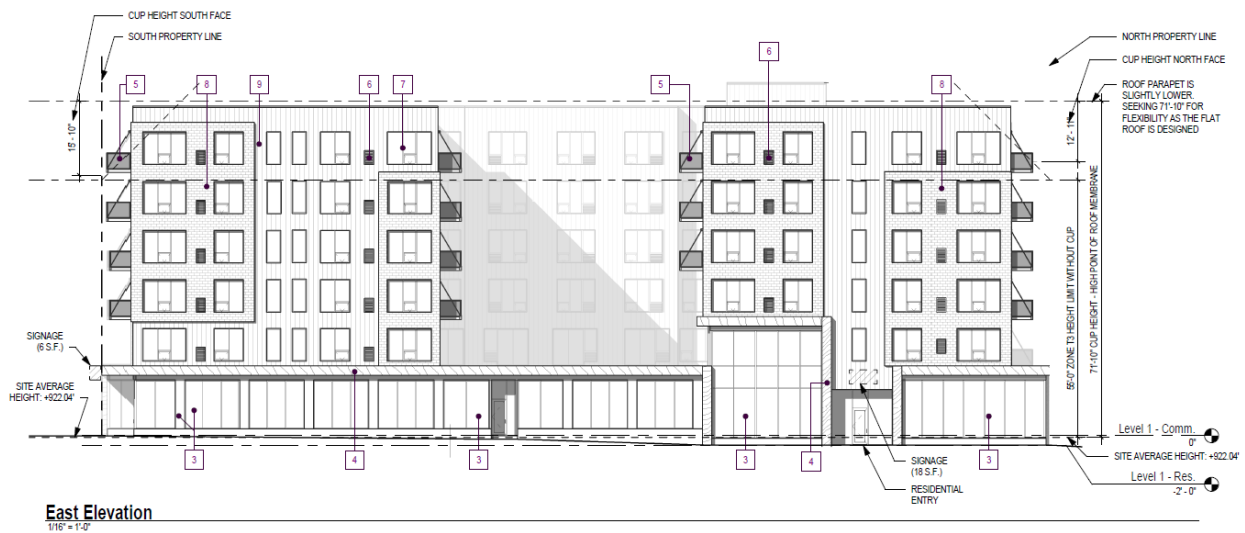
This 0.59-acre site (zoned T3) is directly across Snelling Avenue west of Allianz Field, and adjacent to both Green Line LRT and A Line Arterial Bus Rapid Transit. A 6-story, 72'-high, mixed use building has been approved for the site with 137 multi-family residential units and ground floor commercial space. Though no vehicle parking is required due to the proximity to University Avenue, 88 spaces of structured parking will be integrated into the building at ground level and below ground. Seven on-street parking spaces were removed to allow for wider sidewalks abutting the project on Snelling. See Figures 35 & 36.

The proposal required a conditional use permit (CUP) to exceed 55' in height in non-interior portions of the site. It also required a variance to exceed the maximum FAR of 3.0, to permit an FAR of 4.71.

Figure 35: Existing Site at 455 Snelling Avenue (building recently demolished)



Figure 36: Planned Mixed-Use Building at 455 Snelling Avenue



ANALYSIS

This section is broken down into several subsections:

- Comprehensive Plan Guidance;
- Zoning Regulations;
- Grand Avenue; and
- Other Potential Approaches

Comprehensive Plan Guidance

The 2030 Comprehensive Plan contains many strategies that encourage higher residential densities and provision of additional housing options, particularly in proximity to public transit. Potentially applicable Comprehensive Plan strategies include:

- **LU-1.2 Permit high density residential development in Neighborhood Centers, Mixed-Use Corridors, the Central Corridor, and Downtown.** (Much existing and potential RM zoning is in Mixed-Use Corridors and the Central Corridor.)
- **LU-1.3 Study the RM multi-family districts and the TN districts to determine how they can accommodate more intense residential development.**
- **LU-1.5 Identify residential areas where single-family, duplex housing, and small multi-family housing predominate as Established Neighborhoods, and maintain their character.** (Much existing and potential RM zoning is in Established Neighborhoods.)
- **LU-1.9 Encourage the development of medium density multi-family housing along Residential Corridors.** (Much existing RM zoning is along Residential Corridors.)
- **LU-1.21 Balance the following objectives for Mixed-Use Corridors through the density and scale of development: accommodating growth, supporting transit use and walking, providing a range of housing types, and providing housing at densities that support transit.**
- **LU-1.28 Promote conditions that support those who live and work along Mixed-Use Corridors, including frequent transit service, vibrant business districts, and a range of housing choices.**
- **LU-1.40 Promote the development of housing that provides choices for people of all ages, including singles and young couples, families, empty-nesters, and seniors.**
- **LU-1.41 Promote the development of a range of housing types and housing values in each of the 17 planning districts.**
- **LU-1.42 Promote the development of housing in mixed-use neighborhoods that supports walking and the use of public transportation.**
- **LU-1.43 Explore the use of planning and development tools to increase the production of housing, including, but not limited to, accessory units in existing neighborhoods, density bonuses for affordable units, and parking reductions.**
- **LU-3.1 Continue to utilize and improve the provisions and design standards for the Traditional Neighborhood (TN) districts and the citywide general design standards in Section 63.110 of the *Saint Paul Zoning Code* to achieve a high quality pedestrian-scaled urban environment.**
- **H-1.1 Increase housing choices across the city to support economically diverse neighborhoods.**
- **H-1.2 Meet market demand for transit-oriented housing.**
- **H-1.3 Revitalize the city by developing land-efficient housing.**
- **H-1.5 Prioritize non-financial City/HRA assistance to multi-family and mixed-use housing in new construction projects** (including zoning for transit-supportive density levels and reduced parking requirements for housing located in areas with frequent transit service).

Additionally, the draft 2040 Comprehensive Plan is likely to be formally adopted soon after this zoning study is complete. The 2040 Comprehensive Plan policies support this zoning study and provide guidance. Potentially applicable policies from the draft 2040 Comprehensive Plan include:

- **LU-1. Encourage transit-supportive density and direct the majority of growth to areas with the highest existing or planned transit capacity.**
- **LU-8. Ensure that zoning and infrastructure support environmentally and economically efficient, resilient land use development.**
- **LU-9. Promote high-quality urban design that supports pedestrian friendliness and a healthy environment, and enhances the public realm.**
- **LU-14. 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.**
- **LU-29. Ensure that building massing, height, scale and design transition to those permitted in adjoining districts. (applicable only to Mixed Use-designated areas)**
- **LU-34. Provide for medium-density housing that diversifies housing options, such as townhouses, courtyard apartments and smaller multi-family developments, compatible with the general scale of Urban Neighborhoods. (applicable only to Urban Neighborhoods)**
- **LU-35. Provide for multi-family housing along arterial and collector streets, and in employment centers to facilitate walking and leverage the use of public transportation. (applicable only to Urban Neighborhoods, which is the designation applied to many – but not all – arterial and collector streets through predominantly residential areas)**
- **H-7. Reduce overcrowding within housing units, caused by doubling up of households and inadequate space for large families, through the production of small and family-sized affordable housing options.**
- **H-16. Increase housing choice across the city to support economically diverse neighborhoods by pursuing policies and practices that maximize housing and locational choices for residents of all income levels.**
- **H-36. Encourage the development of family-sized affordable housing in strong market areas.**

Zoning Regulations

The RM standards most obstructing to increased density compared to T standards, based on examples noted above, are maximum density, minimum parking requirements, and maximum lot coverage. Additionally, the 9,000-square foot minimum for 3+ units is a major obstacle to “missing middle” scale development in RM in large portions of the city where 5,000-6,500 square foot lots predominate, such as in the 1729 Randolph example. Setbacks and height standards are lesser obstacles. If RM were to become an alternative to T districts where additional density is desired to reinforce a transit- and pedestrian-oriented environment, then T

district design standards (or similar) should also be applied. The following subsections analyze potential amendments to RM standards by topic.

Intent Statements

RM districts' intent statements should be revised to reflect the extent that they become intended for additional transit- and pedestrian-oriented form like the T districts.

Density

Minimum density in RM districts could be increased in two main ways: decrease the minimum lot size per unit, or adopt FAR regulations similar to T2-T4 districts. A main advantage of using FAR is that it eases future conversions between uses, focusing instead on the form of the building and its overall size. Another related advantage is that it is easier for City staff to administer. A third impact with both advantages and disadvantages is that FAR tends to encourage smaller residential units than minimum lot size per unit regulations. On the one hand, smaller units mean more potential density. However, smaller units are not conducive to families in need of 2+ bedroom units. Another consideration is that the current RM lot area per unit standard has led to 4-bedroom units designed for unrelated adults such as students sharing a larger apartment. Paired with T districts regulated by FAR, RM districts regulated by minimum lot size per unit could provide a greater variety of housing options.

Under the current RM lot area per unit standard, common space amenities are not counted against the maximum number of units. Under a maximum FAR standard, common space amenities would be part of the maximum floor area allowed, which may put some downward pressure on the provision of common space amenities.

Regulating RM districts by FAR is the recommended approach, upon consideration of the above tradeoffs.

In the table below, existing and proposed permitted densities are presented, as calculated based on the attached proposed Zoning Code amendments and assuming 15% common space, and not including any affordable housing bonuses. The proposed amendments would set a maximum FAR of 0.6 for the RM1 district (or 1.0 with structured parking), 1.5 for RM2 (or 2.25 with structured parking), and 2.0 for RM3 (or 3.5 with structured parking).

Figure 37: Existing and Proposed Permitted Densities (approximate, calculated with assumptions)

Zoning District	Maximum Density* (units/acre)							
	Assuming 1,000 s.f. units				Assuming 700 s.f. units			
	With Surface Parking		With Structured Parking		With Surface Parking		With Structured Parking	
	Existing	Proposed	Existing	Proposed	Existing	Proposed	Existing	Proposed
RM1	22	23	31	38	22	32	31	54
RM2	29	57	48	85	29	81	48	122
RM3	54	57	218	133	54	81	218	189
T1	25		40		25		40	
T2	76		114		108		162	
T3	114		114		162		162	
T4	no maximum		no maximum		no maximum		no maximum	

*Density is often realistically limited by other factors like parking, setbacks, lot coverage, etc., as discussed elsewhere in this document.

The proposed maximum FARs would represent an increase in permitted density in RM1 and RM2, as well as RM3 sites with surface parking, but a reduction in density allowed in RM3 with structured parking, as shown in the table above.

The proposed maximum FARs for RM2 are somewhat less than for T2 to recognize the greater variety of locations that RM2 exists, yet they allow for substantial increases in density in RM2 compared to existing regulations.

RM1 is proposed to be treated in a substantially different manner than T1 by using FAR to regulate density. In T1, purely residential uses are limited to 25 units per acre (or 40 units per acre with structured parking), while mixed uses are limited to 1.0 FAR. The effective density of RM1 compared to T1, then, depends on assumptions about unit sizes, with ~1,000 square foot units having a similar density in both districts and smaller units gaining density in RM1 compared to T1.

As a specialized subset of density regulations, multi-family residential buildings with 3+ units require a minimum lot size of 9,000 sq. ft. in the RM districts. Elimination of this requirement would open up many more lots, such as the typical 40'- or 50'-wide lots zoned RM2 along Grand Avenue or Selby Avenue, to potential partitioning of buildings or redevelopment for multi-family residences.

Density bonuses for structured parking encourage parking to be provided within a structure, rather than on a paved surface, to result in a more efficient use of land (less “sea of parking”) and more pedestrian-friendly design. The density bonus allows more residential units which can help pay for the incremental cost of placing parking within a structure. Theoretically, density bonuses

for structured parking might incentivize the creation of *too much* structured parking. In reality, however, structured parking is expensive enough that developers are not likely to overbuild structured parking just for the density bonus.

Minimum FARs are not proposed for the RM districts, in contrast to the equivalent T districts, because they are not anticipated to have any regulatory impact. The City’s experience in administering minimum FAR in the T districts is that it is only an issue with single-story commercial buildings, not residential buildings. With no commercial uses in the RM districts, a minimum FAR is unlikely to have any regulatory impact – so it could easily be eliminated in the name of simplicity. Minimum FARs are established in the T districts in order to encourage pedestrian-oriented form with new construction. Since nobody is likely to propose single-story residences, such regulation is unnecessary in the RM districts.

Parking

Parking is a frequent barrier to density in RM districts compared to T districts. T districts hold two advantages: (1) parking requirements are eliminated within ¼ mile of University Avenue, and, more universally, (2) parking requirements are reduced by 25% for multi-family residential buildings with more than six dwelling units in T1 or T2 districts, and for all residential buildings in T3 or T4 districts.

The 2014 zoning study on Transit Streets is informative. That study eliminated being within ¼ mile of a “transit street” (generally high-frequency transit lines) as a qualifier to get a 25% parking reduction for residential uses in T1 and T2 districts. However, based on neighborhood input, the study added a qualifier that residential uses must have more than six units to get the reduction, because it was found that the small buildings were the most likely to cause a parking problem with such a reduction. A similar amendment to RM districts would make sense for the same reasons.

As far as elimination of parking requirements within ¼ mile of University Avenue, such a clause should logically apply to residential uses without regard to zoning. That is, a multi-family residential building’s tenants are as likely to use the Green Line if the building is in a T district or an RM district.

Density bonuses for structured parking can have several impacts, as discussed above in the Density section.

Lot Coverage

The RM maximum lot coverage of 35% appears to be an occasional barrier to density. One of the main benefits of a maximum lot coverage is to provide green space for both enjoyment and stormwater benefits. Elimination of the maximum lot coverage would be partially mitigated by the T standard requiring street trees and by retaining RM’s larger minimum building setbacks. Notably, many of the RM buildings on Grand Avenue already exceed the maximum lot coverage. The recommended code amendments also eliminate the maximum lot coverage for the RT1 and RT2 districts.

Height

There does not appear to be a need to change height standards in RM districts to increase density. Height is not a limiting factor in any of the example scenarios examined above. Indeed, on smaller sites without room to provide larger building setbacks, RM1 and RM2 districts provide greater maximum heights than T1 and T2 districts, and RM3 districts have no height maximums at all (although, to some extent in the RM3 zoning district, any new maximum FAR regulation would in effect limit heights). *Reduced* maximum heights might be worth consideration in RM districts to ensure neighborhood compatibility if minimum side or rear yard setbacks are reduced.

However, increased height maximums might be appropriate with a conditional use permit in the RM2 district to ensure the additional density proposed herein can actually be realized – where situationally appropriate.

Setbacks

Minimum setbacks appear to be an occasional barrier to density in RM districts. In one example scenario above, it is an ancillary factor after maximum density and maximum lot coverage for a new multi-family building with underground parking on 0.31 acres. However, in that case the maximum lot coverage would need to be increased to at least 51% in that situation for the minimum rear yard setback to be a factor. In the other example where it appears as a barrier, a single-family teardown situation, smaller side yard setbacks might be desirable to make construction more realistic on narrow lots – and reflective of existing development patterns established along former streetcar routes, where side yard setbacks are often 4' to 6'. Reduced rear yard setbacks are another way to add density, especially if maximum heights are reduced.

Design Standards

Part of the impetus for this study is that neighborhoods desire Traditional Neighborhood design standards even where only residential uses are desired. If RM districts are intended to become more pedestrian-oriented (see Intent Statements section above), then it makes sense to apply many of the pedestrian-oriented T district design standards to the RM districts. This section evaluates the impact (pro and con) of imposing T design standards in the RM districts.

RM1

RM1 might logically refer to the 15 T1 design standards. Many of the standards would be clear in their application, for example requiring building façade articulation (doors, windows, texture, etc.) and definition of residential entries. A potentially problematic standard is that buildings anchor the corner, which would be difficult to administer in situations like the McDonough Homes and Roosevelt Homes campuses. In the same settings, the requirement for 1-story buildings to appear like 2-story buildings would deviate from the well-established architectural form, and could serve to deter infill. Additionally, the standard that off-street parking be provided within a principal structure, underground, or to the rear of buildings to greatest extent possible would not be very straightforward in a setting like the McDonough Homes campus where parking is not exactly in a yard, but rather scattered around the campus. An adjusted approach might refer to all of the T1 design standards that are not problematic in RM1.

RM2

RM2 might logically refer to the 22 T2 design standards, which includes the 15 T1 design standards plus 7 additional standards. Standards that would be clear in their application include façade articulation, definition of residential entries, and maximum block lengths. Compared to RM1, most RM2 settings would allow for clear administration of standards calling for anchoring corners (besides perhaps the Mount Airy campus) and for 1-story buildings to appear like 2-story buildings. Overall, administering T2 design standards in RM2 would be as clear as it is in T2.

RM3

Applying T dimensional standards to building additions on most existing RM3 buildings would be awkward. For example, their tower-in-a-park settings are antithetical to anchoring the corner or providing a human-scale articulation along the streets. Also, it is not clear how one would “use established building façade lines” on the block when it is a super-block with a single tower building in the center. However, new construction on RM3 lots – or newly zoned RM3 properties without a tower-in-a-park existing setting – is more likely to occur than building additions. New construction on RM3 could benefit from many of the T dimensional standards. The “tower in a park” settings would change, and a human-scale form would be created where the new buildings are placed.

Grand Avenue

There are two stretches of Grand Avenue that merit special consideration: the properties zoned RM2 between Fairview Avenue and Cretin Avenue, and the properties zoned BC Community Business (converted) farther east.

A footnote to the RM2 dimensional standards provides additional regulation for a 0.7-mile stretch of Grand Avenue from Fairview to Cretin that contains much RM2 zoning and is near the University of St. Thomas. This includes a lower height maximum (40’ instead of 50’), a requirement to comply with the T2 design standards, and a special minimum lot size for units with three or more bedrooms. The minimum lot size provision no longer makes sense with the shift to FAR-based density regulation – it was imposed to close a loophole that had been used in student-oriented residential buildings to just create larger units to accommodate more students, but there is no incentive for developers to continue doing that under the FAR model. It is also proposed that the reference to T district design standards be made to apply to all the RM districts, and relocated to a more universal location within the code. The maximum height provision is recommended to be left in-force.

Due to the history of the BC district as a formerly B2 district where businesses are allowed in existing residential structures while retaining the visual character of the residential building form, two footnotes to the Business District dimensional standards refer to RM2 dimensional standards for residential buildings in that district: one regarding front yard setbacks, and the other regarding density. Front yard setbacks are not proposed to change in RM2, so the letter of the footnote will simply need to be updated without any change in impact. For the density footnote, it is proposed that residential buildings in BC follow the proposed FAR-based density

in RM2 – that their regulations change with RM2’s rather than being a remnant island of status quo.

Other Potential Approaches

The following alternative approaches could be considered to implement the aims of this zoning study, but are not currently being recommended.

Rezoning More Places to T

Another potential approach to applying T standards in more places is to simply rezone more places to T districts, particularly T1. The T1 district has a rather limited set of permitted commercial uses, such as offices, dental or medical clinics, banks, service businesses, and coffee shops, that are unlikely to become widespread outside of arterial and collector streets due to lending requirements and real estate needs (i.e. larger lots with good access). Notably, restaurants, bars, and general retail are not permitted in T1 – all uses that can present heightened parking concerns.

Bonuses for Larger Units

A potential complementary approach to counteract the tendency of FAR-based regulation to create smaller apartments, and to instead encourage larger (e.g. 3-bedroom) units is to create an FAR bonus for creating larger units. For example, the maximum FAR could be increased by 0.1 for every 3-bedroom unit created by a project, up to some higher limit. Larger units could also be encouraged via financial tools, like conditions placed upon affordable housing financing.

Bonuses for Common Space Amenities

Similar to the larger unit FAR bonus suggested above, a bonus for provision of common space amenities could be created to counteract the tendency of FAR-based regulation to reduce floor area dedicated to common space.

PUBLIC HEARING TESTIMONY

Thirteen sets of public comments were received via the Planning Commission public hearing, including two from district councils and others from small-scale developers and individual residents. Testimony included general support for the study, opposition to certain elements, support for certain elements, and urging to go farther on certain elements. More specifically:

- The North End Neighborhood Organization (District 6 Council) supports the study, citing housing needs.
- The Summit Hill Association (District 16 Council) wants:
 - o to generally move toward T districts’ height and side yard setbacks, to encourage smaller-scale multifamily that is more compatible with their neighborhood’s existing character and still provides density;
 - o a CUP for height up to 45’, as an option only for lots of 60’+ width;
 - o a reduction in RT1 and RT2 maximum height from 40’ to 30’;
 - o maximum lot coverage set at 50%, rather than eliminated, to reduce incentives to combine lots and construct buildings that are too massive for their context;

- a corresponding increase in RT2's maximum lot coverage to 50% (RT1 would stay at 35%);
 - the East Grand Overlay to be recognized as an additional footnote to Table 66.231;
 - to support elimination of the 9,000 square foot minimum for 3+ units, to facilitate small-scale multi-family development;
 - reduction of minimum side yard setbacks from 9' to 6' for lots of 60' width or narrower, to address the greater impact of side yard setbacks on smaller lots;
 - an additional tier in the FAR maximum for buildings with structured parking that are not near Arterial Bus Rapid Transit, Light Rail, etc., with that tier having a maximum of 2.0 FAR in the RM2 district;
 - parking requirements for RM2 to remain in place – all of the recommendations above are based on that assumption;
 - to keep Footnote B to Table 66.231, which counts half of the adjacent alley in minimum lot size calculations.
- A resident opposes removal of the phrase “low-rise” from the RM1 and RM2 district titles in Sec. 60.301, and also opposes density increases in RM1 or RM2 because of health effects related to fires and airborne infectious diseases. They suggest that density should instead be concentrated in larger RM3 buildings that are constructed better to deal with these health effects (e.g. air exchange or fire suppression systems).
- A resident opposes keeping Footnote K to Table 66.231, which limits height and creates a special minimum lot size for RM2-zoned property along Grand Avenue between Fairview and Cretin Avenues, because it is exclusionary.
- A resident opposes eliminating the 9,000 square foot minimum for 3+ units to allow for additional green space and easier fire department access around buildings.
- A resident questioned whether the study is too complex for people to understand, and if it can be properly evaluated by neighborhoods without 3D representations in addition to aerial photographs of examples.
- A resident wants the Parking Zoning Study considered together with the RM Zoning Study to allow analysis of the RM amendments' practicality and feasibility, and of the cumulative impact. If that timing does not occur, then urges a units/acre limit to be retained (with an incremental increase in those maximums) and associated parking requirements to be unchanged in the RM districts. Also, supports the Summit Hill Association's proposed amendments.
- A resident supports the change to FAR-based density regulation, removing the 9,000 square foot minimum for 3+ units, and eliminating the maximum lot coverage. They also want front and rear setbacks reduced to 10 feet, a taller RM2 height maximum to accommodate 4-6 stories, and a bonus for 3+ bedroom units and apartment common areas to avoid penalizing them in the shift to FAR.
- A developer wants smaller setbacks, especially for side yards. They question keeping Footnote K to Table 66.231 (limiting height and creating a special minimum lot size along Grand Avenue between Fairview and Cretin), and suggest selectively rezoning properties on Grand Avenue to T2.

- A developer wants smaller setbacks, or at least an exception for stairways, porches, and decks.
- A developer supports the increased maximum heights, in recognition of modern construction standards with more height per story. They want a 75 foot height maximum with a CUP in RM2 to align with Fire Code and allow for an extra (6th) story in some cases. They also want a higher maximum lot coverage (in RL-R4 districts where it is not proposed to be removed) to encourage accessory dwelling units (ADUs) and gentle density increases. Finally, they want to keep Footnote B to Table 66.231, which counts half of the adjacent alley in minimum lot size calculations.
- A developer wants to reduce side yard setbacks to 6 feet for RM1 and RM2 properties under ¼ acre. They also want to reduce required parking by 25% for such properties.

ANALYSIS OF TESTIMONY

The section below analyzes the main issues raised by public testimony.

1. Issue: Lower maximum heights.

Response: Proposed new 5-story buildings have generated some opposition in recent years due to concerns over how they fit into neighborhood context. This includes the 5-story apartment at 1975 Marshall Avenue that helped precipitate the Marshall Avenue Zoning Study in 2019, and the 5-story apartment at 1769 Grand Avenue that was denied variances by the Board of Zoning Appeals in April 2020. Opposition to such heights has also been registered in this zoning study's public hearing, by the Summit Hill Association.

Most infill buildings in RM-zoned areas along arterial streets through residential areas in recent history have been shorter: 2 to 4 stories.

Compatibility with the scale of adjacent neighborhoods does not mean having new structures that are no taller than existing buildings. But new structures that are multiple stories taller than the existing context can push the bounds of compatibility, especially on narrow lots and mid-block.

However, lower maximum heights are not recommended. Maximum FARs and parking needs will realistically discourage taller buildings on narrow lots – only the most efficient layouts in areas with less parking need are likely to approach the existing maximum heights on such lots. To further limit height on larger RM-zoned parcels on the East Side and elsewhere, such as the parking lots of 1970s era apartment buildings surrounded by lawns and far from other residential structures, would serve no policy purpose and would limit reasonable density.

2. Issue: Smaller side yard setbacks.

Response: There are many 40'-wide lots zoned RM along arterial streets (e.g. Grand,

Randolph) that would become easier to develop for medium-density infill multi-family that diversifies housing options if the minimum setbacks were less than 9', and thus buildings were allowed to be wider than 22'. A 22'-wide building envelope is very narrow for residential development. Most existing apartment buildings along such arterial streets are already built with smaller side yard setbacks, such as 4' or 6'. Residential buildings in T1-T4 districts require 6' side yard setbacks in most cases. A side yard setback requirement similar to that in the T districts would be reasonable and would fit in well with established building patterns. Smaller side yard setbacks are less necessary on wider lots, and they provide more benefit to adjacent neighbors if the new buildings are taller (see previous issue).

3. Issue: Smaller rear yard setbacks and maximum lot coverage limits.

Response: Decreased rear yard setbacks and maximum lot coverage could make it easier to add housing units by allowing greater use of the lot.

There is no clear policy reason to limit maximum lot coverage in the RM districts, and deleting the maximum lot coverage would further several policies related to efficient land use. The suggestion that "preservation of significant publicly-accessible views" requires a maximum lot coverage is misplaced – the "significant views" are identified by the Comprehensive Plan, and do not include views around all multi-family residential buildings.

A rear yard setback reduced from 25' to 9' would allow significantly more space for a larger building footprint, while still allowing for perimeter landscaping in the rear. Lot coverage and rear yard setbacks are less impactful to neighborhood character than what is visible from the streets: height, front yard setbacks, and side yard setbacks.

4. Issue: Eliminate Footnote K to Table 66.231 (limiting height and creating a special minimum lot size along Grand Avenue between Fairview and Cretin).

Response: This footnote was created in 2013 in response to student-oriented apartments being built in RM2-zoned areas on Grand Avenue near the University of St. Thomas. This zoning study has not focused on those issues, which can be complex and involve several stakeholders not actively engaged for this study. However, the portion of the footnote addressing density (minimum lot area per unit) would seem to no longer be necessary with the shift to FAR-based regulation, and therefore no concern that 4-bedroom student-oriented housing is somehow skirting the intent of minimum lot area per unit by creating more massive units. No change is recommended to the height portion of this footnote. (Note: due to reorganization, Footnote K is now proposed to be Footnote M.)

5. Issue: An additional maximum FAR tier in RM2, set at 2.0, for multi-family residential with structured parking that is not near high-quality transit.

Response: Proximity to high-quality transit impacts parking need. Parking need is most effectively addressed through parking regulations, not by suppressing FAR in order to suppress parking demand.

6. Issue: Complete the Parking Zoning Study prior to this study, or ensure that parking requirements for RM districts will remain unchanged.

Response: The Parking Zoning Study will analyze impacts to all parts of the city, including those zoned RM. The most effective way to address parking issues is through parking regulations, rather than suppressing density in order to suppress parking demand.

7. Issue: Reduce parking requirements for smaller properties.

Response: The proposed amendments to parking regulations bring RM regulations in-line with T regulations. Further reductions in parking requirements should address all zoning districts, as is being done through the forthcoming Parking Zoning Study.

8. Issue: Do not increase density in RM1 and RM2 because large multi-family buildings, such as in RM3, are safer with regard to fire and airborne diseases.

Response: According to a City staff expert in the Department of Safety & Inspections, larger multi-family buildings (over 4 stories) do not require better ventilation than smaller multi-family buildings, although they do fall under different codes. If anything, the requirements for smaller buildings are more precise, although larger buildings' ventilation must also be effective. More important to ventilation are how the HVAC system is designed and how much the owner is willing to spend. No change is recommended.

9. Issue: Increase the maximum height to 75' in RM2 to align with Fire Code.

Response: The difference between the initially proposed 70' maximum height with a CUP and 75' is not significant, especially if both heights require a CUP. There is no policy reason not to consider a greater maximum height, and it makes sense to align to other codes when plausible.

10. Issue: Keep Footnote B to Table 66.231, which counts half of the adjacent alley in minimum lot size calculations.

Response: This footnote is already applied citywide – for all zoning districts – in Chapter 63. It does not need to be repeated here.

11. Issue: Amend RT district regulations and/or R district regulations

Response: This study has been advertised as reviewing potential amendments to the RM zoning districts, and therefore should primarily be limited to regulations focused on the RM districts. Far more land is zoned R or RT, with impacts that have not been analyzed in this study. No change recommended.

12. Issue: Bonuses for larger residential units (more bedrooms) or larger common spaces to avoid penalizing them in the shift to FAR-based density regulation.

Response: It is still not clear how necessary this is, and it would require adding complexity to the regulations that would ideally be avoided.

OTHER REVISIONS

The following proposed revisions have been addressed after the Planning Commission public hearing, but are not tied directly to the public testimony received.

RM3 FAR Maximums

An additional proposed set of revisions is to adjust the maximum FARs in the RM3 zoning district so that the maximum FAR with surface parking is reduced to 1.5, and the maximum FAR with structured parking is increased to 3.5. There are a few reasons to consider this: (1) although RM3 is mostly currently limited to a handful of PHA towers and senior living towers, it could be used more widely in the future along new transit corridors where the mix of uses in T districts is not desired; (2) the T4 district has no maximum FAR, and recently approved zoning cases in the T3 district have requested variances to exceed the maximum 3.0 FAR, indicating a strong market demand in certain locations and a comfort by policymakers with the higher FARs; (3) with a greater split between the RM3 FAR maximums for developments with surface parking versus structured parking, it would send a strong signal to developers (especially in newly rezoned RM3 properties along transit lines) that structured parking is part of the desired form in this most intense residential zoning district, rather than a form that includes an environmentally and aesthetically detrimental sea of surface parking.

Affordable Housing Bonus

The Comprehensive and Neighborhood Planning Committee wanted to ensure that the proposed code amendments do not miss opportunities to address affordable housing in the course of loosening zoning regulations to allow adding more residential units. Thus, an affordable housing FAR bonus is recommended to incentivize affordable housing in the RM zoning districts. The bonus would allow up to an extra 0.5 FAR if at least 10% of new units are affordable (at 60% Annual Median Income for 15 years), and up to an extra 1.0 FAR if at least 20% of new units are affordable. The concept of an affordable housing bonus is specifically supported by 2030 Comprehensive Plan Policy LU-1.43.

In the bonus approach, the lower rent revenues that come from the affordable housing units are essentially made up by revenue received from market rate units. Conveniently, the affordable housing units should be easier to fund in the areas they're needed most – where the market rents are highest. Where financial subsidy is involved, the maximum proposed bonus (1.0 FAR for

20% units as affordable) may support the feasibility of mixed-income affordable projects within RM zones, such as those taking advantage of the “4(d) Affordable Housing Incentive Program.” (See <https://www.stpaul.gov/departments/planning-economic-development/housing/housing-trust-fund/4d-affordable-housing-incentive> for details.)

For the bonus to be effective, it must be large enough to be valuable to developers. Upon initial consultations with the City’s Housing Director, staff indicates that the proposed bonuses might be set just about right, as well as the focus on 60% AMI. See the attached document “Affordable Housing Units Impact of FAR Bonus” to see examples of the numbers of units (overall and affordable) that could be produced by the proposed bonuses.

Also important to the bonus’s effectiveness is setting the “base” maximum FAR (without affordable housing) at a level that it improves the chances that the affordable housing bonus would be used, especially in hotter housing markets where it is most helpful to affordability. However, it is also important to not reduce the base FAR maximums to the extent they would unduly suppress multifamily development and further exacerbate the affordability crisis. Upon analysis of case studies, it appears that the proper “base” maximum FAR is approximately 2.25 for RM2 and 3.5 for RM3. The maximum FARs could be adjusted in the future if necessary, based on how well these aims are met.

COVID-19

Since the RM Zoning Study was released for public comment in February, the COVID-19 pandemic has grown into a major public health emergency locally and worldwide. The pandemic’s heavy impact on dense urban areas like New York City has given reason to question the public health benefits of increased density, such as that potentially facilitated by this zoning study. At the same time, it is important to recognize limitations to drawing comparative conclusions of density’s impact on airborne disease transmission, including:

- By several measures, New York City is not a very comparable urban area to Saint Paul. New York City’s core is far denser, has much more human activity, and has far greater transit mode share (~56%).
- Other dense cities such as San Francisco and Seoul, Korea have been much less hard hit (as of early June) than New York City.
- Many urban areas that are more comparable to Minneapolis/Saint Paul in terms of density, like Portland, Oregon or Kansas City, Missouri, have been much less hard hit (as of early June) than New York City or even Minneapolis/Saint Paul.
- Suburban areas have also been heavily impacted in certain regions. For instance, the suburban counties surrounding Philadelphia are experiencing nearly the same confirmed case and death rates as the central city (as of early June).
- Outbreaks have also occurred in rural areas, such as in Nobles County, Minnesota and Dougherty County, Georgia.

In short, it is not yet clear the extent to which residential density contributes to transmission of airborne diseases such as COVID-19. Given the countervailing, and more proven, public health and welfare benefits of increased density, it would be premature and damaging to reject increased density, per se, due to the COVID-19 pandemic. Also, restricting the construction of

new residential units could lead to additional overcrowding in existing units, with negative health benefits, particularly as viewed through an equity lens. This is a situation that merits continued monitoring and exploration of targeted interventions with regard to building design, human behavior, public health, or other factors that could allow for the benefits of density to continue to be enjoyed, safely.

It should also be noted that Comprehensive Plan policy has not changed in response to COVID-19.

COMMITTEE RECOMMENDATION

The Comprehensive Planning Committee recommends approval of the attached draft Planning Commission resolution recommending the RM Zoning Study for City Council approval.

Attachments

1. Draft Planning Commission resolution (including recommended RM Zoning Code Amendments)
2. Proposed RM Zoning Code Amendments (annotated)
3. Traditional Neighborhood District Design Standards (Sec. 66.343)
4. Traditional Neighborhood District Dimensional Standards (Sec. 66.331)
5. Affordable Housing Units Impact of FAR Bonus
6. Maps
 - a. RM Zoning (all)
 - b. RM1 Zoning
 - c. RM2 Zoning
 - d. RM3 Zoning
7. Public testimony

city of saint paul
planning commission resolution
file number _____
date _____

WHEREAS, the Saint Paul Zoning Code, found in chapters 60 through 69 of the Saint Paul Legislative Code, is established to promote and to protect the public health, safety, morals, aesthetics, economic viability and general welfare of the community; and

WHEREAS, Section 61.801(a) of the Zoning Code calls for periodic review of said code to reflect current city policies, to address current technology and market conditions, and to bring the zoning code up-to-date; and

WHEREAS, the 2030 Saint Paul Comprehensive Plan, in Strategy LU-1.3, calls for studying the RM zoning districts to determine how they can accommodate more intense residential development; and

WHEREAS, RM zoning districts could be more appropriate districts for adding residential density and transit-supportive, pedestrian-oriented form in places where the mix of commercial and residential uses permitted in Traditional Neighborhood districts are not desired; and

WHEREAS, on February 7, 2020, the Planning Commission passed Resolution 20-29 that initiated a zoning study to consider amendments to the Zoning Code pertaining to the RM zoning district regulations in Article 66.200 of the Zoning Code, and other connected regulations contained in the Zoning Code; and

WHEREAS, the Saint Paul Planning Commission held a duly noticed public hearing regarding potential amendments to RM zoning regulations; and

WHEREAS, the Comprehensive and Neighborhood Planning Committee of the Saint Paul Planning Commission, having reviewed the public hearing testimony and a memorandum containing analysis provided by staff, provided a recommendation for consideration by the Saint Paul Planning Commission; and

WHEREAS, the Saint Paul Planning Commission, having reviewed the public hearing testimony and the Comprehensive and Neighborhood Planning Committee's recommendation, finds the proposed text amendments to be supported by the policies of the Comprehensive Plan.

NOW, THEREFORE, BE IT RESOLVED, by the Saint Paul Planning Commission, under the authority of the City's Legislative Code, that the following proposed amendments to the Legislative Code is recommended for approval by the Mayor and Council of the City of Saint Paul:

Existing language to be deleted shown by ~~strikeout~~. New language to be added shown by underlining.

Chapter 60. Zoning Code - General Provisions and Definitions; Zoning Districts and Maps Generally

ARTICLE III. 60.300. ZONING DISTRICTS AND MAPS GENERALLY

Sec. 60.301. Zoning districts established.

For the purposes of this code, the city is hereby divided into the following zoning districts:

(a) Residential districts.

RL one-family large lot residential district

R1 one-family residential district

R2 one-family residential district

R3 one-family residential district

R4 one-family residential district

RT1 two-family residential district

RT2 townhouse residential district

RM1 low-density, ~~low-rise~~ multiple-family residential district

RM2 medium-density, ~~low-rise~~ multiple-family residential district

RM3 high-density, ~~high-rise~~ multiple-family residential district

Chapter 63. Zoning Code – Regulations of General Applicability

ARTICLE II. 63.200. PARKING REQUIREMENTS

Sec. 63.207. Parking requirements by use.

(b) Off-street parking reductions. The minimum number of off-street parking spaces as determined in Section 63.207(a) shall be reduced by one hundred (100) percent in traditional neighborhood and RM1-RM3 multiple-family residential districts when more than fifty (50) percent of both the building and the parcel are within one-quarter (¼) mile of University Avenue, and may also be reduced for:

1. Shared parking, as described in section 63.206(d);
2. Bicycle parking, as described in section 63.210(b);
3. Shared vehicle parking, as described in section 63.211.

Chapter 66. Zoning Code – Zoning District Uses, Density and Dimensional Standards

ARTICLE II. 66.200. RESIDENTIAL DISTRICTS

Division 1. 66.210. Intent

Sec. 66.215. Intent, RM1 low-density multiple-family residential district.

The RM1 low-density multiple-family residential district is intended to provide for an environment of predominantly one- and two-family, townhouse and lower-density multiple-dwelling structures, along with civic and institutional uses, public services and utilities that serve residents in the district, to provide for a variety of housing needs, and to serve as zones of transition between less restricted districts and more restricted districts.

Sec. 66.216. Intent, RM2 medium-density multiple-family residential district.

The RM2 medium-density multiple-family residential district is designed for multiple-family residential and supportive, complementary uses. Its intent is to foster and support pedestrian- and transit-oriented residential development and provide for infill housing to meet a variety of housing needs. intended to provide for more extensive areas of multiple-family residential development and a variety of congregate living arrangements, as well as uses that serve the needs of the multiple-family residential districts. It is intended to provide for comprehensive development of multiple-family uses and a balance of population concentration near major thoroughfares, transit, and related facilities.

Sec. 66.217. Intent, RM3 high-density ~~rise~~ multiple-family residential district.

The RM3 high-density ~~rise~~ multiple family residential district is intended to provide sites for high density multiple-dwelling structures adjacent to high-frequency transit service and high traffic generators commonly found in the proximity of major shopping centers and areas abutting major thoroughfares and expressways. It is also designed to serve the residential needs of persons desiring apartment-type

accommodations with central services as opposed to the residential patterns found in the RM1 and RM2 multiple-family residential districts. ~~The high-rise nature of the district is provided to allow for greater density with lower coverage, which will in turn result in more open space.~~

Division 3. 66.230. Residential District Density and Dimensional Standards

Sec. 66.231. Density and dimensional standards table.

Table 66.231, residential district dimensional standards, sets forth density and dimensional standards that are specific to residential districts. These standards are in addition to the provisions of chapter 63, regulations of general applicability.

Table 66.231. Residential District Dimensional Standards

Zoning District	Lot Size Minimum (per unit)		<u>Building Height</u> Maximum		<u>Yard Setbacks</u> Minimum (feet)		
	Area (sq. feet.) (b)	Width (feet)	Stories	Feet	Front	Side	Rear
RL one-family large lot	21,780 (db)	80	3	30	30 (gf)	10	25
R1 one-family	9,600 (ec)	80	3	30 (l)	30 (gf)	10	25
R2 one-family	7,200	60	3	30 (l)	25 (gf)	8 (hg)	25
R3 one-family	6,000	50	3	30 (l)	25 (gf)	6 (hg)	25
R4 one-family	5,000	40	3	30 (l)	25 (gf)	4 (hg)	25
RT1 two-family (a)	3,000 (fd)	25	3	40	25 (gf)	9	25
RT2 townhouse (a)	2,000 2,500 (e);(fd)	20	3	40	25 (gf)	9 (ih)	25
RM1 multiple-family (a)	2,000 (e);(f)	n/a	3	40	25 (g)	9 (i)	25
RM2 multiple-family (a)	1,500 (e);(f);(k)	n/a	5 (k)	50 (k)	25 (g)	9 (i)	25
RM3 multiple-family	800 (e)	n/a	no max.	no max.	25 (g)	9 (i);(j)	25

<u>Zoning District</u>	<u>Floor Area Ratio (FAR)</u>	<u>Building Height</u> <u>Maximum</u>	<u>Yard Setbacks</u> <u>Minimum (feet)</u>		
	<u>Maximum (e)</u>	<u>Feet</u>	<u>Front</u>	<u>Side</u>	<u>Rear</u>
<u>RM1 multiple-family (a)</u>	<u>0.6 FAR with surface parking</u> <u>1.0 FAR with structured parking</u>	<u>40 (i)</u>	<u>25 (f)</u>	<u>9 (h)</u> <u>(m)</u>	<u>25</u>
<u>RM2 multiple-family (a)</u>	<u>1.5 FAR with surface parking</u> <u>2.25 FAR with structured parking</u>	<u>50 (j) (m)</u>	<u>25 (f)</u>	<u>9 (h)</u> <u>(k)</u>	<u>9 (k)</u>
<u>RM3 multiple-family</u>	<u>1.5 FAR with surface parking</u> <u>3.5 FAR with structured parking</u>	<u>no maximum</u>	<u>25 (f)</u>	<u>9 (h)</u> <u>(k)</u>	<u>9 (k)</u>

~~n/a— not applicable~~

Notes to table 66.231, residential district dimensional standards:

- (a) R4 one-family district dimensional standards shall apply when one-family dwellings are erected in ~~less restrictive~~ RT1-RT2 residential districts. RT1 two-family district dimensional standards shall apply when two-family dwellings are erected in ~~less restrictive~~ the RT2 residential districts.

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

~~(c) No multiple-family dwelling shall be built, nor shall additional dwelling units be added to an existing building to create three (3) or more dwelling units, on a lot that is less than nine thousand (9,000) square feet in area.~~

~~In calculating the area of a lot for the purpose of applying the minimum lot area per unit requirement, the lot area figure may be increased by three hundred (300) square feet for each parking space (up to two (2) parking spaces per unit) within a multiple-family structure or otherwise completely underground. Parking spaces within an above-ground parking structure, except for the top level, may also be used for this lot area bonus. The maximum number of units possible on a lot using this lot area bonus can be calculated using the formula $X = L \div (A - 600)$, where X = maximum units allowed, L = lot area in square feet, and A = required lot area per unit in square feet. A site plan showing parking layout and dimensions shall be required when applying for this lot area bonus.~~

~~(d)~~ A larger lot may be required depending on how much square footage is actually needed to properly site and install an individual sewage treatment system.

~~(e)~~ Where over half of the lot has slopes of twelve (12) percent or greater, the minimum lot size shall be fifteen thousand (15,000) square feet. When determining lot size, the slope shall be that in existence prior to any grading or filling. Alterations shall not be allowed that will lower the slope from twelve (12) percent or greater to less than twelve (12) percent prior to the creation of new lots.

~~(f)~~ If townhouses are developed on parcels where only the land immediately beneath each dwelling unit constitutes an individually described lot and all other land required for yards, other open space, parking, and other necessary land as required by this code constitutes "common" properties, jointly owned by the owners of the described lots beneath each dwelling unit, the minimum size lot per unit shall be applied to the entire parcel.

(e) Floor area ratio (FAR) shall be prorated upon the percentage of parking that is provided as structured parking. The FAR maximum with structured parking may be increased by 0.5 if at least 10% of new dwelling units are affordable at 60% of the Area Median Income for at least 15 years. The FAR maximum with structured parking may be increased by an additional 0.5 (total of 1.0 increase) if at least 20% of new dwelling units are affordable at 60% of the Area Median Income for at least 15 years. Units required to be affordable shall be occupied by qualifying low-income residents. Prior to receiving a certificate of occupancy for the new building (or building expansion),

demonstration of the commitment to affordable housing in accordance with this footnote must be provided as: a deed restriction or other contractual agreement with the city, or a city housing and redevelopment authority financing agreement or other similar financing agreement, and documentation of low-income residents' qualifications.

- (g) Where at least fifty (50) percent of the front footage of any block is built up with principal structures, the minimum front yard setback for new structures shall be the average setback of the existing structures, or if the block average is more than the minimum required front setback listed in the dimensional standard table, it shall be the setback requirement in the district plus half the amount the average setback is greater than the setback requirement in the table. Existing structures set back twenty (20) percent more or less than the average shall be discounted from the formula.
- (h) For permitted and conditional principal uses allowed in these residential districts other than residential uses, the side yard setback shall be a minimum of nine (9) feet.
- (i) Side yards are required only for dwelling units on the ends of townhouse structures. When two (2) or more one-family, two-family, or townhouse structures are constructed on a single parcel, there shall be a distance of at least twelve (12) feet between principal buildings. ~~When two (2) or more multifamily buildings are constructed on a single parcel, there shall be a distance of at least eighteen (18) feet between principal buildings.~~ For two-family and multifamily dwellings in RM1 and RM2 districts on lots of sixty (60) feet width or narrower, the minimum side yard setback is reduced to six (6) feet for buildings of thirty-five (35) feet height or less. The side yard setback requirement from interior lot lines may be reduced or waived when an easement or common wall agreement, certified by the City building official for conformance with the state building code, is recorded on the deeds of the adjoining parcels.
- (j) On lots more than sixty (60) feet wide and on corner lots, a maximum height of forty-five (45) feet may be permitted with a conditional use permit.
- (k) If at least half of provided parking is structured parking, a maximum building height of seventy-five (75) feet may be permitted with a conditional use permit. A shadow study may be required for a conditional use permit application to help determine the impact of the additional height.
- (l) For portions of a building over fifty (50) feet in height, the minimum side and rear yard setbacks shall be twenty-five (25) feet or nine (9) feet plus one-half the building height over fifty (50) feet, whichever is less.
- (m) ~~For property along Grand Avenue between Fairview Avenue and Cretin Avenue, between lines defined by the parallel alleys immediately north and south of Grand Avenue:—~~
 - ~~(1) Building height shall be limited to four (4) stories and forty (40) feet;~~
 - ~~(2) The minimum lot size for units with three (3) bedrooms shall be one thousand seven hundred (1,700) square feet per unit, and the minimum lot size for units with four (4) or more bedrooms shall be one thousand nine hundred (1,900) square feet per unit; and;—~~

~~(3) The T2 design standards in section 66.343 shall apply.~~

- (l) For R1—R4 residential districts in planning districts 14 and 15, excluding property with local heritage preservation site or district designation, the following maximum building heights shall apply at side setback lines: 28 feet in R1, 26 feet in R2, 24 feet in R3, and 22 feet in R4. One (1) foot shall be added to the maximum building height per each one (1) foot the portion of the building is set back from the nearest side setback line, to a maximum height of thirty-five (35) feet. Building height for flat roofs shall be measured to the highest point of the parapet, if present.

(m) For property along Grand Avenue between Fairview Avenue and Cretin Avenue, between lines defined by the parallel alleys immediately north and south of Grand Avenue, building height shall be limited to four (4) stories and forty (40) feet.

Sec. 66.232. Maximum lot coverage.

In ~~R1—R4~~ residential districts, principal buildings shall not cover more than thirty-five (35) percent of any zoning lot. For R1—R4 residential districts in planning districts 14 and 15, excluding property with local heritage preservation site or district designation, the total lot coverage of all buildings, including accessory buildings, shall not exceed forty (40) percent.

Division 4. 66.240. Required Conditions

Sec. 66.242. Multiple-family design standards.

The design standards in section 66.343(b)(2), (3), (7), (9), (11), (14), (15), (16), (19), (20), (21), (22), and (23) shall apply to multiple-family dwellings, along with the provisions in section 66.343(a).

Sec. 66.243. Parking requirements in RM1—RM3 multiple-family residential districts.

The minimum amount of required off-street parking may be reduced by twenty-five (25) percent for buildings with more than six (6) dwelling units in RM1—RM3 districts when more than fifty (50) percent of both the building and the parcel are within one-half (½) mile of University Avenue or any transit station serving light rail transit, bus rapid transit, streetcar or arterial bus rapid transit.

ARTICLE IV. 66.400. BUSINESS DISTRICTS

Sec. 66.431. Density and dimensional standards table.

- (c) Since BC zoned property has a residential character, buildings shall maintain a twenty-five-foot front setback or meet the requirements of section 66.231~~(g)~~(f).
- (g) In the BC community business (converted) district, principal structures shall not cover more than thirty-five (35) percent of any zoning lot, and residential buildings shall meet the ~~minimum lot size per unit~~ maximum floor area ratio (FAR) requirements of section 66.231 for the RM2 multiple-family residential district.

Proposed RM Zoning Study Code Amendments (Annotated)

Existing language to be deleted shown by ~~strikeout~~. New language to be added shown by underlining.

Chapter 60. Zoning Code - General Provisions and Definitions; Zoning Districts and Maps Generally

ARTICLE III. 60.300. ZONING DISTRICTS AND MAPS GENERALLY

Sec. 60.301. Zoning districts established.

For the purposes of this code, the city is hereby divided into the following zoning districts:

- (a) Residential districts.
 - RL one-family large lot residential district
 - R1 one-family residential district
 - R2 one-family residential district
 - R3 one-family residential district
 - R4 one-family residential district
 - RT1 two-family residential district
 - RT2 townhouse residential district
 - RM1 low-density, ~~low-rise~~ multiple-family residential district
 - RM2 medium-density, ~~low-rise~~ multiple-family residential district
 - RM3 high-density, ~~high-rise~~ multiple-family residential district

Chapter 63. Zoning Code – Regulations of General Applicability

ARTICLE II. 63.200. PARKING REQUIREMENTS

Sec. 63.207. Parking requirements by use.

- (b) Off-street parking reductions. The minimum number of off-street parking spaces as determined in Section 63.207(a) shall be reduced by one hundred (100) percent in traditional neighborhood and RM1-RM3 multiple-family residential districts when more than fifty (50) percent of both the building and the parcel are within one-quarter (¼) mile of University Avenue, and may also be reduced for:
 - 1. Shared parking, as described in section 63.206(d);
 - 2. Bicycle parking, as described in section 63.210(b);
 - 3. Shared vehicle parking, as described in section 63.211.

Chapter 66. Zoning Code – Zoning District Uses, Density and Dimensional Standards

ARTICLE II. 66.200. RESIDENTIAL DISTRICTS

Division 1. 66.210. Intent

Sec. 66.215. Intent, RM1 low-density multiple-family residential district.

The RM1 low-density multiple-family residential district is intended to provide for an environment of predominantly one- and two-family, townhouse and lower-density multiple-dwelling structures, along with civic and institutional uses, public services and utilities that serve residents in the district, to provide for a variety of housing needs, and to serve as zones of transition between less restricted districts and more restricted districts.

Sec. 66.216. Intent, RM2 medium-density multiple-family residential district.

The RM2 medium-density multiple-family residential district is designed for multiple-family residential and supportive, complementary uses. Its intent is to foster and support pedestrian- and transit-oriented residential development and provide for infill housing to meet a variety of housing needs, intended to provide for more extensive areas of multiple-family residential development and a variety of congregate living arrangements, as well as uses that serve the needs of the multiple-family residential districts. It is intended to provide for comprehensive development of multiple-family uses and a balance of population concentration near major thoroughfares, transit, and related facilities.

Sec. 66.217. Intent, RM3 high-density rise multiple-family residential district.

The RM3 high-density rise multiple-family residential district is intended to provide sites for high density multiple-dwelling structures adjacent to high-frequency transit service and high traffic generators commonly found in the proximity of major shopping centers and areas abutting major thoroughfares and expressways. It is also designed to serve the residential needs of persons desiring apartment-type accommodations with central services as opposed to the residential patterns found in the RM1 and RM2 multiple-family residential districts. The high-rise nature of the district is provided to allow for greater density with lower coverage, which will in turn result in more open space.

Division 3. 66.230. Residential District Density and Dimensional Standards

Sec. 66.231. Density and dimensional standards table.

Table 66.231, residential district dimensional standards, sets forth density and dimensional standards that are specific to residential districts. These standards are in addition to the provisions of chapter 63, regulations of general applicability.

Table 66.231. Residential District Dimensional Standards

Zoning District	Lot Size Minimum (per unit)		Building Height Maximum		Yard Setbacks Minimum (feet)		
	Area (sq. feet)(b)	Width (feet)	Stories	Feet	Front	Side	Rear
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R1 one-family	9,600 (ec)	80	3	30 (l)	30 (ef)	10	25
R2 one-family	7,200	60	3	30 (l)	25 (ef)	8 (hg)	25
R3 one-family	6,000	50	3	30 (l)	25 (ef)	6 (hg)	25
R4 one-family	5,000	40	3	30 (l)	25 (ef)	4 (hg)	25
RT1 two-family (a)	3,000 (fg)	25	3	40	25 (ef)	9	25
RT2 townhouse (a)	2,000-2,500 (e),(fd)	20	3	40	25 (ef)	9 (ih)	25
RM1 multiple-family (a)	2,000 (e),(f)	n/a	3	40	25 (g)	9 (i)	25
RM2 multiple-family (a)	1,500 (e),(f),(k)	n/a	5 (k)	50 (k)	25 (g)	9 (i)	25
RM3 multiple-family	800 (c)	n/a	no max.	no max.	25 (g)	9 (i),(j)	25

Commented [DB(1)]: RL-RT1 revisions here are just updates of footnotes— no substantive changes. RT2 changes are of minor substance to allow footnote “c” to be deleted, since it wouldn’t be needed for any other district under the proposed changes. Decreasing the standard min lot size per unit for RT2 from 2,500 to about 2,000 essentially gets RT2 the same density it had under the old footnote (c). RM1-3 are where the major substantive changes are.

Zoning District	Floor Area Ratio (FAR)	Building Height Maximum	Yard Setbacks Minimum (feet)		
	Maximum (e)		Front	Side	Rear
RM1 multiple-family (a)	0.6 FAR with surface parking 1.0 FAR with structured parking	40 (i)	25 (f)	9 (h)	25
RM2 multiple-family (a)	1.5 FAR with surface parking 2.25 FAR with structured parking	50 (j), (m)	25 (f)	9 (h), (k)	9 (k)
RM3 multiple-family	1.5 FAR with surface parking 3.5 FAR with structured parking	no maximum	25 (f)	9 (h), (k)	9 (k)

n/a— not applicable

Notes to table 66.231, residential district dimensional standards:

- (a) R4 one-family district dimensional standards shall apply when one-family dwellings are erected in ~~less restrictive RT1-RT2~~ residential districts. RT1 two-family district dimensional standards shall apply when two-family dwellings are erected in ~~less restrictive the RT2~~ residential districts.

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

- ~~(c) No multiple family dwelling shall be built, nor shall additional dwelling units be added to an existing building to create three (3) or more dwelling units, on a lot that is less than nine thousand (9,000) square feet in area.~~

~~In calculating the area of a lot for the purpose of applying the minimum lot area per unit requirement, the lot area figure may be increased by three hundred (300) square feet for each parking space (up to two (2) parking spaces per unit) within a multiple family structure or otherwise completely underground. Parking spaces within an above-ground parking structure, except for the top level, may also be used for this lot area bonus. The maximum number of units possible on a lot using this lot area bonus can be calculated using the formula $X = L \div (A - 600)$, where X = maximum units allowed, L = lot area in square feet, and A = required lot area per unit in square feet. A site plan showing parking layout and dimensions shall be required when applying for this lot area bonus.~~

- ~~(db)~~ A larger lot may be required depending on how much square footage is actually needed to properly site and install an individual sewage treatment system.
- ~~(ec)~~ Where over half of the lot has slopes of twelve (12) percent or greater, the minimum lot size shall be fifteen thousand (15,000) square feet. When determining lot size, the slope shall be that in existence prior to any grading or filling. Alterations shall not be allowed that will lower the slope from twelve (12) percent or greater to less than twelve (12) percent prior to the creation of new lots.
- ~~(fd)~~ If townhouses are developed on parcels where only the land immediately beneath each dwelling unit constitutes an individually described lot and all other land required for yards, other open space, parking, and other necessary land as required by this code constitutes "common" properties, jointly owned by the owners of the described lots beneath each dwelling unit, the minimum size lot per unit shall be applied to the entire parcel.
- ~~(e) Floor area ratio (FAR) shall be prorated upon the percentage of parking that is provided as structured parking. The FAR maximum with structured parking may be increased by 0.5 if at least 10% of new dwelling units are affordable at 60% of the Area Median Income for at least 15 years. The FAR maximum with structured parking may be increased by an additional 0.5 (total of 1.0 increase) if at least 20% of new dwelling units are affordable at 60% of the Area Median Income for at least 15 years. Units required to be affordable shall be occupied by qualifying low-income residents. Prior to receiving a certificate of occupancy for the new building (or building expansion), demonstration of the commitment to affordable housing in accordance with this footnote must be provided as: a deed restriction or other contractual agreement with the city, or a city housing and redevelopment authority financing agreement or other similar financing agreement, and documentation of low-income residents' qualifications.~~
- ~~(ef)~~ Where at least fifty (50) percent of the front footage of any block is built up with principal structures, the minimum front yard setback for new structures shall be the average setback of the existing structures, or if the block average is more than the minimum required front setback listed in the dimensional standard table, it shall be the setback requirement in the district plus

Commented [DB(2): This provision is already in Ch 63 and applies in all zoning districts city-wide. It is not duplicated in other district dimensional standards tables, and repetition here can be deleted.

Commented [DB(3): This structured parking bonus concept has been simplified and put right in Table 66.231 for RM1-3, along with new footnote (e).

Commented [D(4): It's "parking" instead of "required parking" to align with the current RM density bonus for structured parking, which is not limited to required parking, and to avoid impact on this provision from changes to parking requirements.

half the amount the average setback is greater than the setback requirement in the table. Existing structures set back twenty (20) percent more or less than the average shall be discounted from the formula.

- (hg) For permitted and conditional principal uses allowed in these residential districts other than residential uses, the side yard setback shall be a minimum of nine (9) feet.
- (ih) Side yards are required only for dwelling units on the ends of townhouse structures. When two (2) or more one-family, two-family, or townhouse structures are constructed on a single parcel, there shall be a distance of at least twelve (12) feet between principal buildings. ~~When two (2) or more multifamily buildings are constructed on a single parcel, there shall be a distance of at least eighteen (18) feet between principal buildings.~~ For two-family and multifamily dwellings in RM1 and RM2 districts on lots of sixty (60) feet width or narrower, the minimum side yard setback is reduced to six (6) feet for buildings of thirty-five (35) feet height or less. The side yard setback requirement from interior lot lines may be reduced or waived when an easement or common wall agreement, certified by the City building official for conformance with the state building code, is recorded on the deeds of the adjoining parcels.
- (i) On lots more than sixty (60) feet wide and on corner lots, a maximum height of forty-five (45) feet may be permitted with a conditional use permit.
- (j) If at least half of provided parking is structured parking, a maximum building height of seventy-five (75) feet may be permitted with a conditional use permit. A shadow study may be required for a conditional use permit application to help determine the impact of the additional height.
- (jk) For portions of a building over fifty (50) feet in height, the minimum side and rear yard setbacks shall be twenty-five (25) feet or nine (9) feet plus one-half the building height over fifty (50) feet, whichever is less.
- (km) For property along Grand Avenue between Fairview Avenue and Cretin Avenue, between lines defined by the parallel alleys immediately north and south of Grand Avenue, building height shall be limited to four (4) stories and forty (40) feet.
- ~~(1) Building height shall be limited to four (4) stories and forty (40) feet;~~
- ~~(2) The minimum lot size for units with three (3) bedrooms shall be one thousand seven hundred (1,700) square feet per unit, and the minimum lot size for units with four (4) or more bedrooms shall be one thousand nine hundred (1,900) square feet per unit; and,~~
- ~~(3) The T2 design standards in section 66.343 shall apply.~~
- (l) For R1—R4 residential districts in planning districts 14 and 15, excluding property with local heritage preservation site or district designation, the following maximum building heights shall apply at side setback lines: 28 feet in R1, 26 feet in R2, 24 feet in R3, and 22 feet in R4. One (1) foot shall be added to the maximum building height per each one (1) foot the portion of the building is set back from the nearest side setback line, to a maximum height of thirty-five (35) feet. Building height for flat roofs shall be measured to the highest point of the parapet, if present.

Sec. 66.232. Maximum lot coverage.

In R1—R4 residential districts, principal buildings shall not cover more than thirty-five (35) percent of any zoning lot. For R1—R4 residential districts in planning districts 14 and 15, excluding property with local heritage preservation site or district designation, the total lot coverage of all buildings, including accessory buildings, shall not exceed forty (40) percent.

Commented [BD5]: This can be covered by the Building Code.

Commented [TA(6)]: This is similar to the provision in § 66.331(k) that applies to all building types in T districts, and also to the provision in § 63.501(d) that applies to accessory buildings. It is reasonable to provide this flexibility for all building types in most residential districts as well when the owners of adjoining properties agree to it.

Commented [BD7]: Recognizes that in RM2 and RM3, rear yard setbacks are now less than 25', and heights could be over 50'. Applies existing side yard footnote concept to the rear yard.

Commented [BD8]: #1 moves to the paragraph above. #2 is no longer necessary for its original purpose (to discourage apartments near the University of Saint Thomas that used multi-bedroom student-oriented housing to create buildings that were too large for their lots, as allowed by lot-size-per-unit regulation) because of the shift to FAR-based regulation. K becomes M so that L (under separate study) remains unchanged.

Commented [DB(9)]: This concept is kept, but moved to 66.242 below.

Commented [DB(10)]: This addition has the impact of eliminating max lot coverage for RT1-2 and RM1-3. The need for yard space is covered by the setback requirements in the dimensional standards table.

Division 4. 66.240. Required Conditions

Sec. 66.242. Multiple-family design standards.

The design standards in section 66.343(b)(2), (3), (7), (9), (11), (14), (15), (16), (19), (20), (21), (22), and (23) shall apply to multiple-family dwellings, along with the provisions in section 66.343(a).

Commented [DB(11): Intended to list the helpful T design standards for RM use, while avoiding problematic ones.

Sec. 66.243. Parking requirements in RM1–RM3 multiple-family residential districts.

The minimum amount of required off-street parking may be reduced by twenty-five (25) percent for buildings with more than six (6) dwelling units in RM1–RM3 districts when more than fifty (50) percent of both the building and the parcel are within one-half (½) mile of University Avenue or any transit station serving light rail transit, bus rapid transit, streetcar or arterial bus rapid transit.

ARTICLE IV. 66.400. BUSINESS DISTRICTS

Sec. 66.431. Density and dimensional standards table.

- (c) Since BC zoned property has a residential character, buildings shall maintain a twenty-five-foot front setback or meet the requirements of section 66.231 ~~(e)~~ **(f)**.
- (g) In the BC community business (converted) district, principal structures shall not cover more than thirty-five (35) percent of any zoning lot, and residential buildings shall meet the ~~minimum lot size~~ **per-unit maximum floor area ratio (FAR)** requirements of section 66.231 for the RM2 multiple-family residential district.

Commented [DB(12): This continues the concept of treating residential in the BC district like it were in RM2 district. Another potential approach that would essentially exempt BC from the RM2 changes is replicating the existing RM2 minimum lot size requirements right here in 66.431 rather than via cross-reference.

Sec. 66.343. - Traditional neighborhood district design standards.

- (a) *Applicability.* The traditional neighborhood district design standards under paragraph (b) below apply to development within T1—T4 traditional neighborhood districts, as indicated in table 66.343, applicability of traditional neighborhood district design standards. Site plans and other development proposals within traditional neighborhood districts shall be consistent with the applicable design standards unless the applicant can demonstrate that there are circumstances unique to the property that make compliance impractical or unreasonable. In cases where more specific design standards or guidelines have been developed as part of city council-approved master plans, small area plans, or other city-approved plans for specific sites, those shall take precedence. All standards in section 63.110, general design standards, are also applicable to development within T1—T4 traditional neighborhood districts.

Table 66.343. Applicability of Traditional Neighborhood District Design Standards

Guidelines	T1	T2	T3	T4
1. Land use diversity			✓	✓
2. Transitions to lower-density neighborhoods		✓	✓	✓
3. Block length		✓	✓	✓
4. Compatible rehabilitation and reuse	✓	✓	✓	✓
5. Use established building facade line	✓	✓	✓	
6. Buildings anchor the corner	✓	✓	✓	✓
7. Front yard landscaping	✓	✓	✓	✓
8. Building facade continuity		✓	✓	✓
9. Building facade articulation - base, middle and top	✓	✓	✓	✓
10. Building height - treatment of 1-story buildings	✓	✓	✓	✓
11. Definition of residential entries	✓	✓	✓	✓
12. Entrance location	✓	✓	✓	✓
13. Door and window openings - minimum and character	✓	✓	✓	✓

14. Materials and detailing	✓	✓	✓	✓
15. Screening of equipment and service areas		✓	✓	✓
16. Interconnected street and alley network		✓	✓	✓
17. On-street parking		✓	✓	✓
18. Parking location and entrance design	✓	✓	✓	✓
19. Residential garage location	✓	✓	✓	✓
20. Parking lot lighting		✓	✓	✓
21. Entrance location for transit access	✓	✓	✓	✓
22. Street trees	✓	✓	✓	✓
23. Sidewalks	✓	✓	✓	✓

(b) *Traditional neighborhood district design standards.*

- (1) *Land use diversity.* In general, it is desirable for each block to include some diversity in housing type, building type, and mix of land uses. In T3M districts any two (2) abutting block faces shall include more than one (1) land use or building type.
- (2) *Transitions to lower-density neighborhoods.* Transitions in density or intensity shall be managed through careful attention to building height, scale, massing and solar exposure.
- (3) *Block length.* Block faces in mixed use areas shall typically not exceed four hundred (400) feet. Block faces in residential areas shall typically follow the pattern of neighboring blocks, but shall not exceed six hundred sixty (660) feet, the length of the standard Saint Paul block. This standard may be modified to ensure compliance with the city's adopted comprehensive plan and development or project plans for sub-areas of the city.
- (4) *Compatible rehabilitation and reuse.* Remodeling, additions or other alterations to existing traditional buildings shall be done in a manner that is compatible with the original scale, massing, detailing and materials of the original building. Original materials shall be retained and preserved to the extent possible.
- (5) *Use established building facade lines.* New buildings shall relate to the established building facade line on the block where they are located. On most nonresidential or mixed use blocks, this is the inside edge of the sidewalk. For corner buildings, each facade that fronts a public street shall maintain the established building facade line. Portions of the facade may be set back a greater distance to emphasize entries or create outdoor seating and gathering areas.
- (6) *Buildings anchor the corner.* New buildings on corner lots shall be oriented to the corner and both public streets. On corner lots at light rail transit station platforms, no portion of a structure

shall be permitted in the triangular area of the lot included within fifteen (15) feet of the corner along each lot line.

- (7) *Front yard landscaping.* Front yard areas located between the principal building and the street shall be landscaped, except on University Avenue where the first four (4) feet may be paved similar to the public sidewalk. Other hard surfaced front yard areas should include amenities such as benches, tables, and planters.
- (8) *Building facade continuity.* New buildings along commercial and mixed-use streets shall provide a continuous facade along the street. Where breaks occur, the street edge shall be continued through the use of fencing, low walls and/or landscaping.
- (9) *Building facade articulation.* The bottom twenty-five (25) feet of buildings shall include elements that relate to the human scale. These should include doors and windows, texture, projections, awnings and canopies, ornament, etc.
- (10) *Building height - treatment of 1-story buildings.* New buildings of two (2) or more stories are encouraged. One-story buildings shall be designed to convey an impression of greater height in relation to the street. This can be achieved through the use of pitched roofs with dormers or gables facing the street, a higher parapet, and/or the use of an intermediate cornice line to separate the ground floor and the upper level.
- (11) *Definition of residential entries.* Porches, steps, pent roofs, roof overhangs, hooded front doors or similar architectural elements shall be used to define all primary residential entrances.
- (12) *Entrance location.* There shall be a primary pedestrian building entrance on all arterial or collector streets. At a corner location where both streets are arterial or collector streets, this standard may be satisfied with a single entrance at the corner. In multi-tenant buildings, any ground floor use with street frontage shall have an entrance facing the street.
- (13) *Door and window openings - minimum and character.*
 - a. For new commercial and civic buildings, windows and doors or openings shall comprise at least fifty (50) percent of the length and at least thirty (30) percent of the area of the ground floor along arterial and collector street facades.
 - b. Windows shall be designed with punched and recessed openings, in order to create a strong rhythm of light and shadow.
 - c. Glass on windows and doors shall be clear or slightly tinted, and allow views into and out of the interior.
 - d. Window shape, size and patterns shall emphasize the intended organization of the facade and the definition of the building.
- (14) *Materials and detailing.*
 - a. Residential buildings of more than six (6) units and nonresidential or mixed use buildings shall be constructed of high-quality materials such as brick, stone, textured cast stone, tinted masonry units, concrete, glass or metal. The following materials are generally not acceptable:
 - Unadorned plain or painted concrete block;
 - Tilt-up concrete panels;
 - Synthetic stucco products;
 - Reflective glass; and
 - Vinyl, fiberglass, asphalt or fiberboard siding.
 - b. All building facades visible from a public street or walkway shall employ materials and design features similar to those of the front facade.

- (15) *Screening of equipment and service areas.* If an outdoor storage, service or loading area is visible from adjacent residential uses or a public street or walkway, it shall be screened by a decorative fence, wall or screen of plant material at least six (6) feet in height. Fences and walls shall be architecturally compatible with the primary structure.
- (16) *Interconnected street and alley network.* The existing street and alley network shall be preserved and extended as part of any new development. If the street network has been interrupted, it shall be restored whenever possible. Cul-de-sac streets are discouraged; crescent-shaped or courtyard street arrangements may be used when street connections are impractical.
- (17) *On-street parking.* Streets shall generally have parking on both sides to buffer pedestrians, calm traffic and supplement off-street parking unless the space is needed to accommodate traffic volume, emergency vehicles, transit or deliveries. Parking bump-ins are permitted in special cases (such as adjacent to large development sites) in conjunction with a redevelopment project that has at least three-hundred (300) feet of street frontage.
- (18) *Parking location and design.*
- a. Off-street parking shall be provided within a principal structure, underground, or to the rear of buildings to the greatest extent possible. Limited side yard parking may be appropriate. Entrance drives and garage doors for underground or structured parking may face the street, except adjacent to light rail transit platforms, but shall be designed for pedestrian convenience and safety.
 - b. Surface parking shall not be located within thirty (30) feet of a corner. Buildings shall be located to emphasize and "anchor" the corner whenever possible.
 - c. Vehicular entrances to structured parking shall be minimized so that they do not dominate the street frontage of the building. Possible techniques include recessing the entry; extending portions of the structure over the entry; using screening and landscaping to soften the appearance of the entry; using the smallest curb cut and driveway possible; and subordinating the vehicular entrance to the pedestrian entrance in terms of size, prominence in the streetscape location, and design emphasis.
 - d. New above-grade parking structures fronting on arterial and collector streets shall be lined with active commercial/retail uses at street level with direct access to the sidewalk.
 - e. Upper levels of new parking structures shall be designed with exterior wall treatments, detailing, fenestration and materials that screen the view of vehicles and relate to existing adjacent buildings.
- (19) *Residential garage location.* Attached residential garages shall be recessed at least ten (10) feet behind the front facade of the building. Detached residential garages shall be located in the side or rear yard, recessed at least twenty-five (25) feet behind the front facade of the building. When an alley is present, garages shall be located in the rear yard and accessed through the alley. Individual residential unit garage entrances shall be off alleys or interior courtyards.
- (20) *Parking lot lighting.* Pedestrian-scale lighting shall be provided within parking areas. Light standards shall be no more than twenty-five (25) feet in height in parking lots and sixteen (16) feet in height along interior sidewalks and walkways, and have a downcast glow.
- (21) *Entrance location for transit access.* New and existing retail, office and multifamily housing shall coordinate with the transit agency in locating bus stops and related improvements. Building entrances shall be located to provide easy access to bus stops and shelters.
- (22) *Street trees.* Street trees in the street right-of-way, as prescribed by the city forester and section 69.600 of the subdivision regulations, and other landscape improvements shall be provided along all streets at regular intervals to help define the street edge, buffer pedestrians from vehicles, and provide shade. Trees shall be located in a planting strip at least five (5) feet wide between the curb and sidewalk, or in a planter or planting structure of a design acceptable to the city.

- (23) *Sidewalks.* Streets shall be designed with sidewalks on both sides except where they abut a park or other open space. Sidewalk width shall be at least five (5) feet, and six (6) feet or more in areas of high pedestrian activity. The T4 district is defined as an area of high pedestrian activity.

(Ord. No. 11-27, § 1, 4-20-11)

Sec. 66.331. - Density and dimensional standards table.

Table 66.331, traditional neighborhood district dimensional standards, sets forth density and dimensional standards that are specific to traditional neighborhood districts. These standards are in addition to the provisions of chapter 63, regulations of general applicability. Where an existing building does not conform to the following requirements, the building may be expanded without fully meeting the requirements as long as the expansion does not increase the nonconformity.

Table 66.331. Traditional Neighborhood District Dimensional Standards

Building Type by Zoning District	Density	Lot Size Minimum (per unit)		Building Height (feet)		Yard Setbacks (feet)		
	Min.—Max.(a)	Area (sq. ft.)(a)	Width (feet)	Min.	Max.	Front Min.—Max.	Side Min.	Rear Min.
T1								
1-family dwelling	6—12 units/acre(b)	3500(b)	30	none	35(e)	15—25(i)	(k)	15
2-family/townhouse	8—20 units/acre(b)	2000(b)	20	none	35(e)	10—25(i)	(k)	15
Multifamily	10—25 units/acre(b)	1700(b)	n/a	none	35(e)	10—25(i)	(k)	(k)
Nonresidential or mixed use	0.3—1.0 FAR	n/a	n/a	none	35(e)	0—25	(k)	(k)
T2								
1-family dwelling	6—12 units/acre(b)	3500(b)	30	none	35(e)	15—25(i)	(k)	15
2-family/townhouse	8—20 units/acre(b)	2000(b)	20	none	35(e)	10—25(i)	(k)	15
Multifamily	FAR as for mixed use	n/a	n/a	none	35(e), (f)	10—25(i)	(k)	(k)

Nonresidential or mixed use	0.3—2.0 FAR with surface parking and 0.3—3.0 FAR with structured parking(c)	n/a	n/a	none	35(e), (f)	0—10(j)	(k)	(k)
T3								
1-family dwelling	8—12 units/acre(b)	3500(b)	30	25	35(e)	15—25(i)	(k)	15
2-family/townhouse	10—20 units/acre(b)	2000(b)	20	25	35(e)	10—25(i)	(k)	15
Multifamily	0.5—3.0 FAR(d)	n/a	n/a	25	45(e), (g), (l)	10—25(i)	(k)	(k)
Nonresidential or mixed use	0.5—3.0 FAR(d)	n/a	n/a	25	55(e), (g), (l)	0—10(j)	(k)	(k)
T4								
Multifamily	0.5 min. FAR(d)	n/a	n/a	25	75(e), (h)	10—25(i)	(k)	(k)
Nonresidential or mixed use	0.5 min. FAR(d)	n/a	n/a	25	75(e), (h)	0—10(j)	(k)	(k)

Min. - Minimum applicable

Max. - Maximum

FAR - Floor Area Ratio

n/a - not

Notes to table 66.331, traditional neighborhood district dimensional standards:

- (a) In calculating the area of a lot that adjoins a dedicated public alley, for the purpose of applying minimum lot area and maximum density requirements, one-half the width of such alley adjoining the lot shall be considered part of the lot. The minimum FAR applies to new buildings. The minimum FAR does not apply to the creation or reconfiguration of lots, or to removal of buildings. For a new building on a zoning lot where an existing building will remain, or where the new building and its associated parking and landscaping will cover only part of the site and leave the rest of the site open for an additional building, minimum FAR may be calculated based on the area of the site covered by the new building and its associated parking and landscaping. Public gathering areas, landscaped areas at least twenty (20) feet wide preserved for future development between the public right-of-way and parking, and land dedicated to the city as public right-of-way may be approved by the planning administrator as counting toward meeting the minimum FAR.

- (b) Units per acre is calculated based on net acreage. Density based on units per acre must be calculated for parcels of an acre or more in size. For smaller parcels, the maximum number of units may be calculated based upon minimum lot size per unit.

In calculating the area of a lot for the purpose of applying lot area and density requirements, the lot area figure may be increased by three hundred (300) square feet for each parking space (up to two parking spaces per unit) within a multiple-family structure or otherwise completely underground. Parking spaces within an above-ground parking structure, except for those on the top level, may also be used for this lot area bonus. The maximum number of units possible on a lot using this lot area bonus can be calculated using the formula $X = L \div (A - 600)$, where X = maximum units allowed, L = lot area in square feet, and A = required lot area per unit in square feet. A site plan showing parking layout and dimensions shall be required when applying for this lot area bonus.

- (c) Floor area ratio (FAR) shall be prorated upon the percentage of required parking that is provided as structured parking. A minimum FAR of 0.5 is required in light rail station areas. Thirty (30) percent of the floor area of structured parking within, above, or below the principal structure may be counted toward meeting the minimum FAR.
- (d) 1.0-3.0 FAR in light rail station areas for lots more than twenty-five thousand (25,000) square feet in area, with no maximum FAR in T4. The floor area of structured parking above or below space used for principal uses, up to an amount equal to the floor area of the principal uses, may be counted toward meeting the minimum FAR. For lots more than twenty-five thousand (25,000) square feet partly in a light rail station area, minimum FAR shall be prorated upon the percentage of the lot in a light rail station area.
- (e) Except in the river corridor overlay district, height of structures may exceed the maximum if set back from side and rear setback lines a distance equal to additional height. Structures shall be no more than twenty-five (25) feet high along side and rear property lines abutting RL-RT2 residential districts; structures may exceed this twenty-five (25) foot height limit if stepped back from side and rear property lines a distance equal to the additional height.
- (f) A maximum height of forty-five (45) feet may be permitted with a conditional use permit.
- (g) Except in the river corridor overlay district and within light rail station areas between Lexington Parkway and Marion Street, a maximum height of ninety (90) feet may be permitted with a conditional use permit. Structures shall be stepped back one (1) foot from all setback lines for every two and one-half (2½) feet of height over seventy-five (75) feet. A shadow study may be required for a conditional use permit application to help determine the impact of the additional height.
- (h) Additional height may be permitted with a conditional use permit. Structures shall be stepped back one (1) foot from all setback lines for every two and one-half (2½) feet of height over seventy-five (75) feet. A shadow study may be required for a conditional use permit application to help determine the impact of the additional height.
- (i) Where at least fifty (50) percent of the front footage of the block is built up with principal structures, the minimum front yard setback for new structures shall be the average setback of the existing structures, or the normal setback requirement in the district plus half the amount the average setback is greater than the normal setback requirement, whichever is less. Existing structures set back twenty (20) percent more or less than the average shall be discounted from the formula. The minimum front yard setback shall not exceed the maximum front yard setback requirement. Sixty (60) percent of the front facade must fall within the maximum setback. For local heritage preservation sites, the standard may be modified to comply with the preservation program and design review guidelines.
- (j) For properties fronting on University Avenue between Marion and Emerald Streets a minimum four (4) foot front yard setback is required. The four (4) foot setback shall be either landscaped or paved. If paved (preferred), the property owner may provide a permanent easement to the City to provide additional sidewalk space. An additional six (6) feet may be added to provide an

outdoor activity zone, pedestrian seating or amenities, resulting in a building setback of ten (10) feet. For local heritage preservation sites, the standard may be modified to comply with the preservation program and design review guidelines.

- (k) No side or rear yards are required along the interior lot lines except as otherwise specified in the building code; provided, that if walls of structures facing such interior lot lines contain windows or other openings, yards of not less than six (6) feet shall be provided. Side and rear yards of at least six (6) feet shall be required when a nonresidential use adjoins a side yard of a residential property. These setback requirements from interior lot lines shall be waived when an easement agreement is recorded as to the affected properties. Proof of such recorded easement shall be provided at the time of application for a building permit. The recording of the easement agreement shall be interpreted to mean that the following intents and purposes of these setback requirements are met: adequate supply of light and air to adjacent property; sufficient space for maintenance of the building from the same lot; and prevention of damage to adjoining property by fire or runoff from roofs. The setback shall be a minimum of thirteen (13) feet from the centerline of an adjoining alley.
- (l) For the T3M Upper Landing area bounded by Chestnut Street, Spring Street, Smith Avenue and the Mississippi River, a maximum height of sixty-five (65) feet may be permitted without a conditional use permit, and a maximum height of one hundred (100) feet may be permitted with a conditional use permit, provided that such developments, to the extent reasonably possible, follow the design guidelines of the "Sustainable Decisions Guide for City Facilities" or other sustainable development guidelines. For the T3M Victoria Park area generally bounded by W. 7th Street, Otto Avenue, Shepard Road and Montreal Way, a maximum height of seventy-five (75) feet may be permitted with a conditional use permit. For the T3M West Side Flats area generally bounded by Wabasha Street, Plato Boulevard, Robert Street, and the Mississippi River, the maximum permitted building heights shall be as shown on Figure 5.4 of the *West Side Flats Master Plan and Development Guidelines* adopted by the city council on June 10, 2015; for the parcels on the northeast and northwest corners of Robert Street and Plato Boulevard, a maximum height of seventy-five (75) feet may be permitted without a conditional use permit, and a maximum height of ninety (90) feet may be permitted with a conditional use permit. A shadow study and/or view analysis shall accompany the conditional use permit application to help determine the impact of the additional height.

(Ord. No. 11-27, § 1, 4-20-11; Ord 14-12, § 2, 6-4-14; Ord 15-5, § 3, 2-5-15; Ord 15-20, § 2, 6-10-15)



North End Neighborhood Organization (District 6)
171 Front Avenue
Saint Paul, MN 55117
651-488-4485
ed@nenostpaul.org

April 13, 2020

Bill Dermody
City Planner
Planning & Economic Development
25 W. 4th St., 14th Floor
Saint Paul, MN 55102

The North End Neighborhood Organization's Board of Directors met with you regarding the RM Zoning Study on Monday April 6, 2020. The city of Saint Paul like most urban areas are experiencing a shortage of housing. The intent of the RM2 medium density multiple family residential district is to support pedestrian and transit orientated residential development and provide for infill housing to meet a variety of housing needs.

In reviewing the proposed changes and after hearing your presentation the North End Neighborhood organization supports the modification and changes to the RM2 zoning code.

We want to thank-you for meeting remotely with us and appreciate the Planning and Economic Development department including neighborhood organizations in your process and seeking our opinion regarding changes, projects and plans

Regards:

A handwritten signature in brown ink, appearing to read "Karin Groening".

Karin Groening
Board Chair

Cc: Ward 1
Ward 5

From: Katherine Cairns <kacairns007@gmail.com>

Sent: Thursday, April 23, 2020 11:43 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Cc: #CI-StPaul_Ward3 <Ward3@ci.stpaul.mn.us>; #CI-StPaul_Ward7 <Ward7@ci.stpaul.mn.us>

Subject: Comments on RM Zoning Study for 5-1-20 Council hearing

Mr. Dermody-

I have reviewed the proposed amendments to Chapters 60, 63, and 66 of the Saint Paul Zoning Code and have **public health and life safety concerns** with several of the proposed amendments. I also noted that the maps at the end of the report neglect to include several large public housing properties which would appear to be covered by City Zoning. I strongly recommend that all properties owned/maintained by St Paul Public Housing also be placed on the City maps. The background document described several of these properties, but when I reviewed the maps, other large public housing units were missing from these public documents.

Chapter 60- Sec. 60.301. Zoning districts established.

I strongly oppose the removal of the "low rise" designation for RM1 and RM2 residential housing districts on the basis of life safety concerns.

RM1 low-density, **low-rise** multiple-family residential district

RM2 medium-density, **low-rise** multiple-family residential district

Rationale: Increasing the size/number of units for more St Paul properties that are classified as RM1 and RM2 (compared to the number of RM3) puts potentially more children, individuals, and disabled persons at risk in the event of fires, community-spread and airborne infectious disease outbreaks. Mitigation efforts focused on a smaller number of larger buildings allows for targeted support, improved building code enhancements for [air exchange](#), larger common hallways, fire suppression, windows that open, disability access inside the building, [disability access for parking](#) by the building, and access to affordable food/medications. The [food deserts](#) that exist in St Paul have increased since the 2017 report with the development along 1-94/University Ave. The City of St Paul also has T1- T4 zoning and housing options that should be pursued instead of the RM1 and RM2 districts. The dual purpose of increasing housing affordability and housing density is best served by new construction of larger RM3 properties rather than remodel/new construction of smaller RM1/RM2 properties that allow for disability access interiors/parking, sufficient air exchange, larger common hallways and fire suppression.

Thank you for your consideration.

Katherine Cairns

--

Katherine A Cairns, MPH, MBA

1894 Summit Ave. St Paul, MN 55105

From: Bob Craft <bobcraft01@msn.com>

Sent: Monday, May 4, 2020 3:52 PM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Cc: monica@wsco.org <monica@wsco.org>; michaelm@wsco.org <michaelm@wsco.org>; Derek Johnson <derekmn@gmail.com>; Hakan Miller <hokancmiller@gmail.com>; Dan Conlan <scootertramp46@gmail.com>; West Side Community Organization <leahs@wsco.org>; Karen Reid (Neighborhood Development Alliance) <kreid@nedahome.org>; gmerriam@nedahome.org <gmerriam@nedahome.org>; Noecker, Rebecca (CI-StPaul) <Rebecca.Noecker@ci.stpaul.mn.us>; Wade, Michael (CI-StPaul) <Michael.Wade@ci.stpaul.mn.us>

Subject: RM Zoning Study – Item from the Comprehensive and Neighborhood Planning Committee.

To: Bill Dermody

From: Robert Craft – WSCO District Council volunteer

Questions and concerns about the RM Zoning Study

1. What is the impact of the RM Zoning Study recommendations on existing Community Plans and previously approved zoning studies? The West Side Flats Master Plan and the recently approved Stryker Ave Zoning Study are of particular concern. Are these plans subject to revision if the new standards are approved?
2. The study offered specific examples of neighborhood impacts including one specific to the West Side on Robie Ave East. However the examples were of top down satellite photos only, not indicating what the proposed height variances or Floor Area Ratio metrics would mean for a project. How can the community evaluate them concretely with this limited information?
3. The West Side Community 10 Year Plan was recently amended to incorporate the Equitable Development Scorecard into all future development. The proposed zoning study makes no reference to this or other community standards. Was this or other District Council standards incorporated into the proposed RM Zoning Study proposal?
4. Speaking personally and not on behalf of WSCO I am concerned with the communication and review process of the RM Zoning Study. I only found out about the study when I received a response from you on April 7th about the initial notice which lacked any useful information about the study.

I listened in on the May 1st Planning Commission meeting and was surprised that only two of 17 District Councils and offered feedback. I don't believe the communication efforts or review process meets the standards of transparency required for these kind of significant changes. Personally I would recommend either holding off on the Public Comment process until there is evidence of better District Council and other stake holders involvement and possibly until the COVID 19 barriers allow for better public input.

Lastly the entire study requires some sort of masters degree in urban planning. If you truly want public input into the these processes then translate the regulation changes into something the lay person can understand. I spent some time reviewing the District 14 and 15 changes and again found them overwhelming. (but at least there were pictures).

Please consider this email public comment on the changes.

Links for my colleagues

<https://www.stpaul.gov/departments/planning-economic-development/planning/planning-commission>

<https://www.stpaul.gov/departments/planning-economic-development/planning/current-activities>

<https://www.stpaul.gov/departments/planning-economic-development/planning/west-side-flats>

<https://www.stpaul.gov/departments/planning-economic-development/planning/current-activities/stryker-avenue-zoning-study>

<https://www.stpaul.gov/sites/default/files/Media%20Root/Planning%20%26%20Economic%20Development/Dist.%2014-Dist.%2015%20Design%20Standards%20PC%2005-01-20.pdf>

Sincerely,

Bob Craft

100 King Street West

WSCO volunteer

From: Jeremy Exley <jeremy.exley@gmail.com>
Sent: Tuesday, April 7, 2020 8:04 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: RM Study Feedback

Planning Commission C/O Bill Dermody,

Comments on RM2 proposed changes.

Setbacks - Sideyard:

I would like to see more relief for side yard setbacks to allow for wider more structurally sound buildings. Especially in scenarios where there are apartments on each side of a lot. Maybe a caveat where if the adjoining properties are not residential use the side yard setback can be reduced? Some houses currently have a setback of 3-4 feet.

Setbacks overall:

I would look more to the T2 setbacks which will allow for higher density.

Max Lot Coverage:

For RM1,2 and 3 I see the max lot coverage went away, however, with front and back setbacks of 25 feet and side of 9 on a single lot the max building size is 36%, so only 1% larger than the previous maximum. Lot size of 40 x 150.

Height:

Note K (1) for Grand Ave Property limiting 40 feet in height compared to note L allowing 70 feet in height. Grand Avenue is a major artery and as such should have large high density buildings. Limiting the height to 40 feet will limit the amount of density allowed. This was a reaction to the building built at 2124 Grand Avenue in 2013 that was 5 stories. If we are now thinking of increasing the height allowance up to 70 feet with a CUP does that Grand Avenue note still make sense? Allowing bigger buildings on Grand and in other RM2 locations will help get rentals out of the more traditional neighborhood homes which will have a positive impact on the neighborhoods and values while keeping students closer to campus or on major arteries.

Is there an option to move any of the properties to T2 or spot changes any of them where development makes sense? Specifically properties that have been left out of recent developments and now are

limited in what they can do. 2132 Grand Avenue is a good example where a developer acquired the properties on either side and left a 2 story home on a single lot between a 5 story and 4 story building.

Thanks,

Jeremy Exley

Owner of 2132 Grand

From: Kristina Kliber <kkliber@comcast.net>

Sent: Thursday, April 30, 2020 10:45 AM

To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>

Subject: Proposed Changes To Lot Size Requirement

Saint Paul Planning Commission,

I am writing to request that you keep the 9,000 sq. ft. lot for 3+ unit developments.

Doing so will provide space on all sides of a structure for the fire department to respond to emergencies.

It will also allow for additional green space in the urban environment and provide for pollinators.

Thank you,
Kristina Kliber
2204 Dayton Avenue

Bill Dermody, City Planner

March 10, 2020

Dear Bill,

Thank you for your presentation of St. Paul's RM Zoning Study at the Macalester Groveland Community Council's (MGCC) Housing and Land Use Committee (HLU) Meeting on February 26, 2020. I'm grateful to the Comprehensive & Neighborhood Planning Committees for their work to create the density our City needs. I appreciate your invitation for citizen comments. I write as a resident of Macalester Groveland, not as a representative of any organization.

I believe that this RM Zoning Study is tainted by the statement on Page 40, "*the proposed code amendments do not address this Grand Avenue-specific footnote and would leave it in-force.*" regarding "*A footnote to the RM2 dimensional standards provides additional regulation for a 0.7-mile stretch of Grand Avenue from Fairview to Cretin that contains a lot of RM2 zoning and is near the University of St. Thomas.*"

I live at 2038 Summit Avenue. A significant segment of this "0.7 mile stretch" is my back yard. Our two-block alley, bounded by a liquor store and a gas station, is alive with diverse neighbors. I **know** my neighbors. I coordinate the Alley Plowing for our Prior/Cleveland stretch. A neighbor from the Fairview/Prior block does the plowing. I've driven alleys up and down Grand Avenue looking for solutions to an ice problem we had on our block. I **know** Grand Avenue, front and back. I can't help but wonder if this "*additional regulation*" comes from a few loud voices West of Cleveland who are sincere in their belief that they know what's best for our neighborhood. I feel disconcerted about what some might think differentiates us from the rest of Grand Avenue.

At the June 3, 2019 Board of Zoning Appeals (BZA) Meeting about a variance for 2150 Grand Avenue, Board Member Danielle Swift had the courage to recognize "discrimination" and "NIMBY" in the opposition to the variance. Board Member Swift did that without knowing that the neighbors on the West Summit Neighborhood Advisory Committee (WSNAC) have a "Neighborhood Stabilization Fund" to give significant sums of money to entice people, including a member of WSNAC, to "convert" student rental property by putting restrictive covenants on deeds to prevent them from renting to students. Ms. Swift wasn't present at a University of St. Thomas (UST) meeting with Student Leaders and neighbors after a racial slur incident on campus. There, a well-meaning neighbor asked a student of color, "Do you feel welcome in our neighborhood?". The Student Leader paused, "Ma'am, no student feels welcome in your neighborhood." I'm a witness to what BZA Member Swift recognized as discrimination and NIMBY. I've been nullified by, "Students aren't a protected class."

I'm entering my seventh year of service on MGCC. I represented MGCC on WSNAC for six years until I resigned October 2019. Our neighborhood's housing market will be impacted when UST's 570 new on-campus beds will be available September 2020. St. Paul's RM Zoning Study

is a timely opportunity for our community to shift from the “War Years” mentality. I invite you to ask: What truly differentiates our “*0.7 mile stretch*” West of Fairview from all of Grand Avenue? What criteria was used to exclude us from the zoning changes recommended for the whole City of St. Paul?

I believe St. Paul’s 2040 Comprehensive Plan is a beacon of hope for our city. The RM Zoning Study provides opportunities for change to meet our density goals. If “*This includes a lower height maximum (40’ instead of 50’), a requirement to comply with the T2 design standards, and a special minimum lot size for units with three or more bedrooms.*” is, as you said at the HLU meeting, left “*in-force*”, Macalester-Groveland is denied the opportunity to fully participate in St. Paul’s 2040 Comprehensive Plan.

I **know** that our “*0.7 mile stretch*” is a good place to live. I **know** my neighbors. I’m not the only one who wants all neighbors to feel welcome here. I ask the Comprehensive & Neighborhood Planning Committees to remove the “*additional regulation for a 0.7-mile stretch of Grand Avenue from Fairview to Cretin*” from the RM Zoning Study to allow Macalester-Groveland to fully participate in the St. Paul’s 2040 Comprehensive Plan.

Zoning that perpetuates discrimination: **Not In My Back Yard!**

Sincerely,

Cathy Plessner
2038 Summit Avenue
cathyplessner@me.com
651-271-6617

Hello Planning Commission,

I'd like to pass on feedback regarding the preservation of the lot setback requirements for RM zones.

I currently own 3 multifamily buildings in St. Paul, and I've had tenants ask me in the past few years if I had any smaller apartments they'd be able to move into since costs have been quickly rising.

After the 2040 plan was passed, I began exploring different options to reduce rent for individual tenants in each of these 3 buildings by adding new units so that building costs can be shared.

While most of the barriers to helping lower rent through zoning are addressed in the RM zoning student, the lot setback requirements can still make any exterior changes difficult.

I would like to see the front, back, and side yard setbacks reduced for all structures so that more housing can be provided. If this isn't feasible, I would be curious as to whether an exception could be added for stairways, porches or decks so that rather than use up valuable interior space (if even possible in the building), a stairway on the exterior can provide access to apartments. In most cases, I imagine a stairway is not going to be taking up the entire side yard of a building. Perhaps in most instances, a compact, multilevel stairway wouldn't need more than 12 or so feet in width, including landings.

Here's a more concrete suggestion for RM zones if it's helpful:

Front/Back yard setback: 10-15ft

(25ft for RM zones seems very restrictive. On many of the lots to be re-zoned to RM in the future, I imagine the setbacks will create a barrier to providing additional housing)

AND

Option 1:

Side yard setbacks: 4ft

OR

Option 2 (if 4ft seems too close for a building):

Side yard setback (building structure): 6ft

Side yard setback (decks, porches, stairways): 3ft

(A 3ft difference between the building and stairway setback would allow for a lot to be efficiently used should the owner wish to run a (narrow) stairway alongside their new addition. Most lot owners would probably wish for the stairway to be at least 4ft wide, however.)

Example 1: Existing building with RM2 zoning, just off the Fairview Green line station.

6 Oakley Avenue

ORANGE: Unusable space with 25ft front setback and 9ft side setback

RED: Desired future 3-story addition that could provide 1 studio apartment per floor

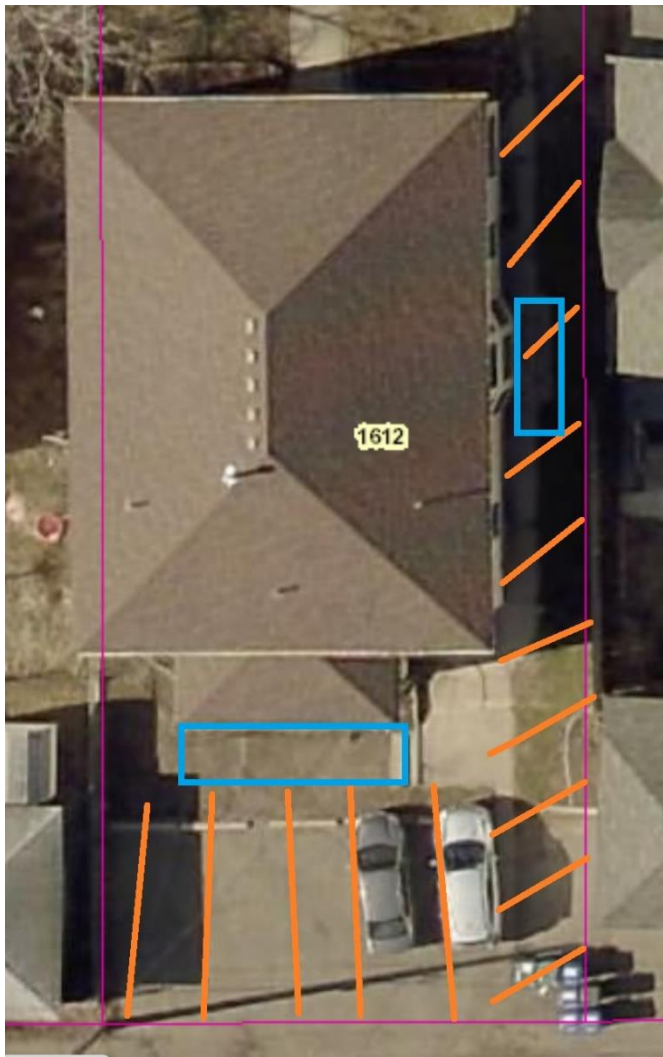
BLUE: Desired stairway to 1st, 2nd, and 3rd floor. Would need to be only 3ft wide with the existing 9ft setback (very tight). Would not allow the front (red) expansion of the same size, so probably would not expand.



I was hoping to be able to use some of my front and side yard to expand the building to provide more housing. A reduced front setback would more easily allow me to add a 2nd and 3rd floor deck off the front of the apartments that overlook Iris park directly ahead (which would be an attractive feature).

If a 9ft side yard setback remains in place, the most I could expand in the red outline is about 11ft to the side and 10ft to the front because I would need additional space in the blue area for a 6ft wide (minimum) stairway. This would mean that the addition to the building would not accommodate any additional units and not be worth the investment.

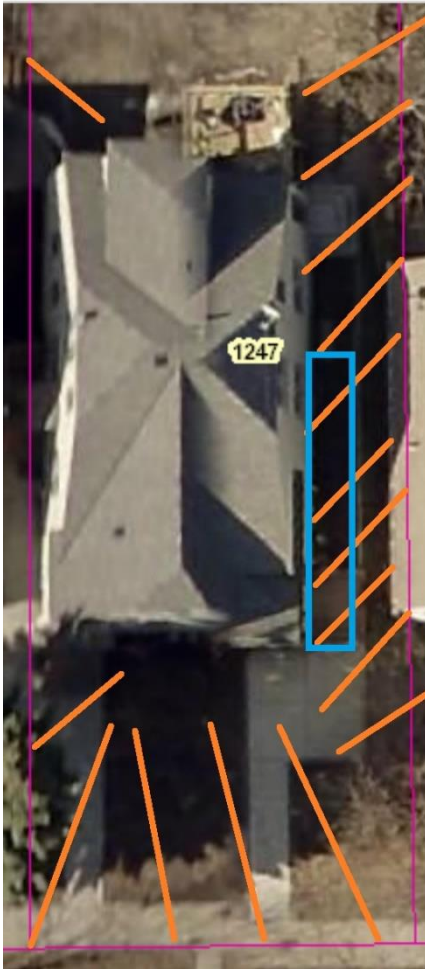
**Example 2: Existing building with R4 zoning, but anticipate (hopeful for) future RM2 zoning, as it's half a block from the A-Line stop at Minnehaha and Snelling.
1612 Van Buren Avenue**



The orange lines show how the 9ft side and rear-yard setback eliminate the possibility expansion.

The blue boxes indicate where I'd like the option of building steps/decks to the 1st and 2nd floors to accommodate additional apartments. I have no option on the side yard, and have a very tight fit on the rear and would likely need to request a variance of a few feet unless I want to try to create a crazy spiraling staircase in the space off to the right and a narrow walkway along the back, which would be ugly.

Example 3: Existing building with R4 zoning but could be a candidate for RM1 zoning in the future with the 2040 plan.
1247/1249 Blair Avenue



You can see that the side yard setback would not allow me to build a straight stairway to the 2nd floor. The 2nd best option would then seem to be in the front with a roof dormer addition, raising costs

This was a fairly quick write-up. Please let me know if you'd like more information, ideas, thoughts from me.

Thank you,
Dustin Schroeder
dustin.schroeder@gmail.com

838 Laurel Ave, St. Paul, MN 55104

From:	Jamie Stopestad < jamie@yardhomesmn.com >
Sent on:	Tuesday, March 3, 2020 7:35:48 PM
To:	Dermody, Bill (CI-StPaul) < bill.dermody@ci.stpaul.mn.us >
CC:	Privratsky, Matt (CI-StPaul) < Matt.Privratsky@ci.stpaul.mn.us >; Pereira, Luis (CI-StPaul) < Luis.Pereira@ci.stpaul.mn.us >
Subject:	St. Paul zoning text amendments
Attachments:	RM Zoning Study PH 4-17-20 ENS Notice.pdf (233.8 KB)

Bill,

I'm writing to share some feedback to the proposed text amendments:

1. Section 66.230. Residential District Density and Dimensional Standards.

- The building height limits in the code seem arbitrary and inappropriate based on current construction technologies and spacial standards. As you know, many buildings built before the mid 1980's had 8'4" or 8'6" finished ceilings and used dimensional lumber for floor joists. In the current era, the standard for interior finished ceiling height has increased to 9' and the industry has migrated almost entirely to (taller) web truss systems. In addition, building codes now require limiting sound transmission between floor-ceiling assemblies, which in practice have increased the depth of these assemblies. The result of these changes has not been captured in zoning codes, and I'd argue it's time for St. Paul's code to reflect this in the Building Height Maximum tables throughout. I think it's reasonable to assume a minimum of 11' floor-to-floor, or better yet 12'. This would make a 3-story structure 33 to 36' tall instead of 30' tall.

- Another reason to increase the floor-to-floor height assumptions is to facilitate the migration to off-site modular construction technologies. There is significant momentum around this shift in construction (more at www.crs Summitmn.com) and this has significant implications on building heights. Full volumetric modular units are 6-sided structural frames and these are stacked on top of each other to form a multi-story modular building. So, instead of a single combined floor-ceiling assembly modular construction results in a floor assembly and a separate ceiling assembly, and in practice adds another horizontal element to the building. If St. Paul wants to foster the adoption of off-site modular construction technologies, then a 12' floor-to-floor height is more appropriate, or again a 36' maximum height for a 3-story building.

- In my view the current height standards reduce practical building height and thus density, in contrast to the overall policy objectives under the comprehensive plan.

2. Section 66.231. Footnote (b)

- I strongly recommend against eliminating this footnote because this would have the impact of downzoning nearly every residential lot in St. Paul, since nearly every such lot adjoins an alley. I suppose the other course of action could be to increase every FAR figure and minimum lot size to compensate for

the reduced lot dimension provided by this footnote. It's hard to understate how significant this proposed change is.

- A key impact of eliminating this provision would be to drastically reduce the number of lots where ADU's are permitted. I don't think this is consistent with stated public policy or your intent.

3. Section 66.231. Footnote (l).

- This seems a proposed new standard and seems arbitrary and mis-aligned with prevailing construction technology and fire codes. The fire code sets 75' as the key height for buildings subject to high-rise code. I'd recommend you therefore use 75' instead of 70' as the relevant maximum height. Do do otherwise, again in light of prevailing construction technologies, would result in effectively one less floor on many larger apartment buildings, which does not seem aligned with the overall goals of the comprehensive plan and city policies.

4. Section 66.232. Maximum Lot Coverage.

- I would strongly recommend an increase in the maximum lot coverage to something greater than 35% for the principal buildings, and at least 50% for all buildings on a lot. The reason for this is primarily to comport with the overall density objectives under the comp plan and particularly related to ADU's. The current zoning codes imposes a number of barriers to the expansion of ADU's in St. Paul, and the current 40% total lot coverage maximum is one of the most significant barriers.

- The limits on lot coverage, especially in residential districts, places significant limitations on the ways the city can adapt to demographic change and growth. Many people I talk with are concerned about the increasing scale of multi-family structures and prefer "gentle density" by increasing the scale of dwellings more subtly and across a wider geography. I think the recent adoption of St. Paul's ADU ordinance city-wide deserves complementary changes to allow ADU's to be built in practice.

Thanks for considering this feedback. Happy to discuss further.

Jamie

https://content.govdelivery.com/attachments/STPAUL/2020/03/03/file_attachments/1391399/RM%20Zoning%20Study%20PH%204-17-20%20ENS%20Notice.pdf

Jamie Stolpestad
Partner, YardHomes MN
Jamie@YardHomesMN.com

From: Jamie Stolpestad <jamie@mn-ozs.com>
Sent: Monday, May 4, 2020 10:55 AM
To: Dermody, Bill (CI-StPaul) <bill.dermody@ci.stpaul.mn.us>
Subject: RM Zoning Study

Bill,

Congratulations on a very comprehensive report and set of recommendations. In light of the extended public comment period, let me re-state my strong recommendation that you amend the height limits corresponding to various references to number of stories.

The current presumption that a story is equal to 10' is out-dated and not consistent with current construction technologies and customer demands for 9' finished ceilings. I think the outcome you intend could be achieved if in each place where there is a 30' maximum height for a 3-story structure you amend / adopt a 35' height. And where there is a 40' maximum height for a 4-story structure you amend / adopt a 45' height. If you were not to make such an amendment, I don't think your proposed changes will in fact achieve the desired impact.

Also, it is not clear from my reading of the proposed text changes if you are intending to change the lot coverage from the past 35% limit. The analysis section of your report indicates that this is sometimes an impediment to adding density. I think this is understated and that in fact it presents a very significant impediment to additional density. Again, to achieve the outcomes you propose, I would recommend you materially increase the lot coverage.

Finally, you propose to limit total heights to 70' under a conditional use permit. I've shared before and re-iterate my recommendation that you make this 75' to coincide with the current Minnesota fire code.

Thanks for considering.

Jamie

Jamie Stolpestad

Managing Partner

Minnesota Opportunity Zone Advisors

+1-203-585-7248

www.MN-OZA.com

From:	Robert Wales < rawales@gmail.com >
Sent on:	Friday, February 21, 2020 3:10:15 PM
To:	Dermody, Bill (CI-StPaul) < bill.dermody@ci.stpaul.mn.us >
Subject:	RM Zoning Study Comments

Good morning -

I'd like to make the following recommendations and comments on the [RM Zoning Study Code Amendments](#).

FAR versus max units

First and foremost I believe the transition to FAR would be a great benefit not only to maximize density potential but also as a standardization across our zoning codes. Removing unit maximums and transitioning to FAR would make for better land use and standards in the code.

The bonus for 3+ units should also be included as well as bonuses for RM2 common areas that would allow for variances for height maximums so that common area doesn't become a penalty to unit density (see below).

Setbacks, Maximum lot size coverage, and heights

In order to maximize land use and to bring RM more inline with T zoning standards, I'd like to see the front and rear setbacks reduced to 10ft which should also increase maximum lot coverage from the current 35%. The maximum lot coverage should be adjusted to be in line with T standards.

Especially in RM2 this would allow for increasing units.

Additionally, I would like to see the height maximum increased in RM2 specifically so that taller multi-unit (4-6) can be accommodated.

Moreover, the footnote regulating the maximum dwelling units on lots less than 9,000 sq ft should be removed. With FAR as the deciding factor, it is irrelevant and antiquated.

Thank you for your consideration of these comments.

Robert Wales
Sustain Saint Paul
1727 Race St
Saint Paul, MN 55116
612-237-0275.

MEMORANDUM

TO: St. Paul Planning Commission c/o Bill Dermody
FROM: Brian Wenger
DATE: May 3, 2020
RE: RM Zoning Regulations

Summit Hill Association (District 16) (“SHA”) submitted extensive written recommendations to the Planning Commission in advance of the May 1, 2020 Planning Commission hearing. One of the SHA recommendations was as follows:

“All of our recommendations [on RM zoning] are based on the assumption that the minimum parking requirements applicable to RM2 buildings remain in place.”

In discussions with you two days before the hearing, you indicated to SHA that you did not expect parking for RM to be addressed in conjunction with the RM zoning changes. Further, the Planning Commission gave only 1 business day after its Friday hearing to provide further written comments.

In light of the limited time to provide extra comments, I am writing to you as an individual only. If the City decides not to affirm the current parking standards in RM as part of the RM zoning revisions, then I propose that a maximum number of units (and the related parking requirements based on number of rooms) be retained in the RM zoning code. Importantly, I also am recommending an incremental increase in the number of units above the existing code.

The accompanying spreadsheet evidences the import of these recommendations. Please look at the area in orange at the bottom of the spreadsheet. It evidences that parking shortfalls can be very substantial under the City’s proposed regulations and that the shortfalls are non-existent or small under the SHA proposal (depending on the size of the units). But, even more importantly, even under the SHA proposal, there is incremental intensification of use – which is aligned with the City’s goals.

In closing, I wish to note the import of addressing parking and zoning *at the same time*. If we do not look at parking at the same time, then we are not able to see if the proposed zoning revision are practical, and even feasible. And, we are not able to see the affect of new buildings on surrounding residents and businesses. In review of your own RM zoning changes, you yourself specifically address certain modifications to the parking code. I am suggesting that we complete this integration for a better end product. I and others stand ready to assist and believe the attached spreadsheet is helpful.

April 26, 2020

Saint Paul Planning Commission
Care of Bill Dermody
25 West Fourth Street, Suite 1400
Saint Paul, Minnesota 55102

Re: Parking and Setback Requirements – Written Testimony, RM Zoning Study

Dear Commissioners and Mr. Dermody,

While largely in support of the proposed changes to the RM Zoning Districts, I urge the City to take further action to alleviate the current housing crisis. RM1 and RM2 zoning comprises 2,579 acres of valuable urban land, much of which was developed prior to current zoning controls. My concern, which I believe is a shared concern, is that neighborhoods experiencing the greatest need for affordable housing (Union Park, Macalester-Groveland, Highland Park, Summit Hill, etc.) lack the tools to develop new housing units at rent levels accessible to the working class. Current zoning regulations discourage new construction proposals that match the character and scale of traditional neighborhoods and require variances for small modifications within existing structures. **As a remedy, I ask the City to consider easing the parking requirement by 25% and side yard setbacks from 9-feet to 6-feet for all RM1 and RM2 zoned parcels less than ¼ acre (10,890 SF).** I believe both changes are consistent with T2 parking standards, T2 setback requirements, and the 2040 Comprehensive Plan.

As the City contemplates updating the RM Zoning Code, it is important to understand that minimal vehicle parking and smaller side yard setbacks match the scale of St. Paul's traditional neighborhoods. Much of the existing infill multifamily housing stock in St. Paul was built in either the early 20th century or during the construction boom from the 1960's to the early 1980's. The apartments built at the turn of the century offered formal dining rooms, built-in storage, and limited outlots since streetcars were the primary mode of transportation. The 1950's brought the advent of cheap consumer automobiles, which lead to suburban sprawl and the need to incorporate at least one parking stall for each housing unit. Much of what was built in either period is now non-conforming under current RM Zoning. It is important to realize that city planners in both eras recognized the need to develop the bulk of the land for either housing or vehicle storage—*neither generation missed the opportunity to develop the land, St. Paul's most valuable asset.*

The 2040 Comprehensive Plan aims to:

- **LU-8** Ensure that zoning and infrastructure support environmentally and economically efficient, resilient land use development, and
- **LU-14** 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

Going forward, it is important to consider any proposed changes to the zoning code in the context of new construction and rehabilitation since both offer opportunities to expand the City's housing stock.

With regard to new construction, the majority of residential lots in the City are between 40-feet and 50-feet wide, and it is exceedingly difficult to assemble more than one parcel on the most densely zoned mixed-use corridors in

the aforementioned neighborhoods (Marshall, Selby, Grand, St. Clair, Randolph, etc.). The current and proposed side yard setback requirement for RM1 and RM2 parcels is 9', which provides only 22' to 32' of buildable width for new structures on a single lot ($9' + 9' = 18'$ of side yard; $40'$ or $50'$ wide lot less $18' = 22'$ to $32'$ of buildable width). This remaining space is insufficient to construct more than six units after factoring egress and parking requirements. Simply reducing side yard setbacks from 9' to 6' will yield ~600 SF of living space per floor per property, which is enough to build six additional housing units on a lot that is 150' deep with 25' front yard and rear yard setbacks with a 100' long building that is five stories in height. Accordingly, it will not be feasible to add more living units through reduced side yard setbacks if density remains constrained by the current parking requirements. It is therefore prudent to reduce the parking minimums and free up land for housing production as the population's habits revert to non-car mobility modes of transportation and the need for housing exceeds the need for off-street parking.

On the other hand, rehabilitating properties may provide the best near-term opportunity to add housing units in the City given the elevated cost of new construction. As previously mentioned, neither existing parking ratios nor 9' side yard setbacks are in harmony with the general intent of the zoning code "to match the scale, character and urban design of Saint Paul's existing traditional neighborhoods." Much of the housing on the aforementioned mixed-use corridors has non-conforming setbacks, non-conforming parking loads, or both. Any time an owner of a non-conforming residential building wants to produce an additional unit by adding living space to an unfinished basement (for example), he/she will be required to submit a variance request—*thus creating unnecessary municipal due process*.

The current zoning code has major discrepancies that inhibit growth towards City's goals and objectives. The two actionables proposed herein will align the 2040 Comprehensive Plan with the existing built environment and accommodate more intense residential development. Furthermore, decreasing side yard setbacks from 9' to 6' and reducing parking minimums by 25% on RM1 and RM2 zoned parcels less than $\frac{1}{4}$ acre in size can eliminate unnecessary municipal due process when rehabilitating existing, non-conforming structures.

Your decision to amend the parking and side yard setback requirements for RM1 and RM2 lots less than $\frac{1}{4}$ acre will produce new housing units in neighborhoods that desperately need increased housing options without compromising the traditional feel of these urban-walkable communities. I hope we do not miss this opportunity.

Very cordially,



Lucas Wiborg
Founder and Owner
Shingle Creek Capital, LLC

Enclosed: Exhibit of structures with non-conforming side yard setbacks

Exhibit: Common Examples of Existing Structures Zoned RM with Non-Conforming Side Yard Setbacks

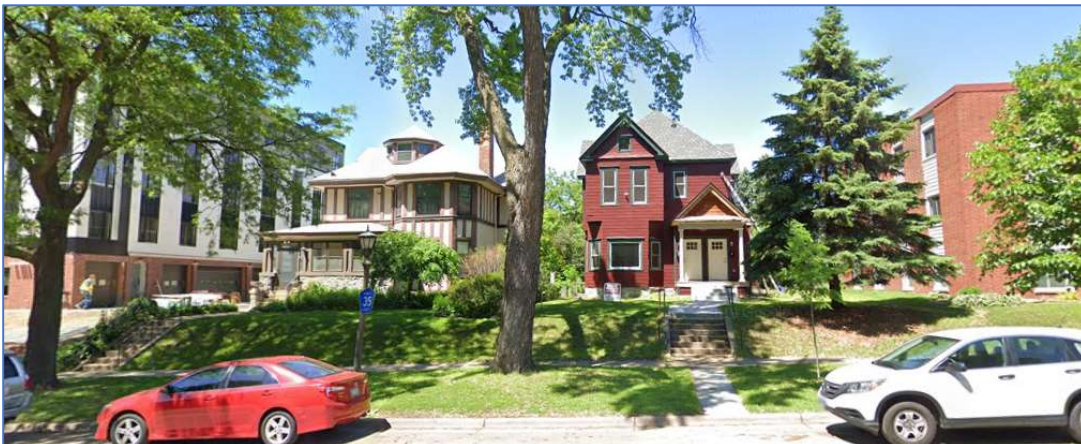
1787 Grand Ave – 18 units built in 1960 (~3' setbacks on either side)



1848 St. Clair Ave – 14 units built in 1938 (~5' side yard on west side) & 1854 St. Clair Ave – 10 units built in 1935 (~4' on east side and ~5' on west side)



1969 Marshall Ave – single family built in 1889 (3' setback on east side and 6' on west side) & 1963 Marshall Ave – duplex built in 1900 (~7' side yard setback on west side), which would require a variance to add a basement unit



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Date: April 27, 2020

To: Councilmember Rebecca Noecker
Bill Dermody
Luis M. Pereira
Emma Siegworth
Noel Nix

RE: Feedback on Proposed Changes to RM Zoning

The Summit Hill Association would like thank Bill Dermody for his previous engagement with us as we reviewed and now provide input on the proposed RM zoning.

The Summit Hill Association supports the concept of “more transit- and pedestrian-oriented residential district[s]” as the foundation of the new RM Zoning proposal. More specifically, SHA supports the City’s efforts to reduce the current and projected housing shortfalls—especially the shortage of affordable housing—through increased density, encouraging transit-supportive density (Policy LU-1), and ensuring that zoning supports environmentally and economically efficient land use (Policy LU-8). And aligned with these goals, we seek the increased density to “provide for medium-density housing that diversifies housing options ... [and be] compatible with the general scale of the Urban Neighborhoods.” (Policy LU-34).

Members of the SHA Zoning and Land Use committee, other members of the SHA Board of Directors, and additional residents of Summit Hill have attended a total of four meetings this month devoted to the topic of the proposed RM zoning changes. The comments and suggestions here come from literally hundreds of hours of discussion, consensus-building, and work among this group.

We posit that the details of **how** increased density is accomplished is truly important. As an urban neighborhood that was built mostly between 1880-1920, we understand the need for a balanced approach to increasing density. Our neighborhood is a prime example of what planners have dubbed the “Missing Middle”—one conducive to increased density in the form of primarily small buildings, along with some medium buildings. When we analyzed the proposed changes by the City, we discovered that many of the changes do not support these types of structures.

In support of increased density and balance reflected in the three policies cited above from the 2040 Comprehensive Plan and the Vision and Core Values¹ set forth therein, we make the following comments and suggestions.

¹ “Vision and Core City Values. Saint Paul is a community that is welcoming to and a place of opportunity for people of all incomes, ages, races, ethnicities and abilities. It accomplishes this by addressing the place- based dimensions of our neighborhoods: embracing growth; offering a wide range of housing choices for its diverse residents; providing a transportation system that meets



1. **We support harmonizing the RM and T2 District design standards with regard to height only**, i.e. a standard maximum of 35ft, and moving closer to the T2 standards with regard to setbacks.

In conjunction with points 2 and 3 below, this is likely to encourage developments that better emulate the character of existing ‘missing middle’ buildings, as we have studied and observed them. This allows the RM2 standard to be used for this purpose without having to permit the broader categories of use allowed under the T2 standard.

SHA greatly values the historical significance and distinct character of the many diverse neighborhoods within the City. We support the City’s effort to “encourage a compatible mix of land uses...that reflect the scale, character and urban design of Saint Paul's existing traditional neighborhoods” (Zoning Code 60.103(1) and to provide appropriate transitions between different adjoining districts (LU-29) and adjacent property types.

2. **We propose a height limit of 35 feet (or 45 feet with a CUP) for all RM properties, and for properties 60 feet wide or less, no option to have a CUP, in keeping with the limits of the T2 guidelines.**

The height of a building is a primary driver of its perceived scale. Buildings of 3 to 3.5 stories are perceived as neighborhood-level scale, whereas buildings of 5 stories or greater feel dominant on their lots and out of step with the existing built environment, more in keeping with a principal urban center than a residential neighborhood. Conversely, many historic buildings comfortably cover up to 50% of their lots without feeling out of place, even though their total built mass (and therefore density) may be greater than a nearby modern 5 story building.

The current proposed changes call for a height limit of 50 feet (70 with a CUP) which is beyond the existing T2 standards and not consistent with the character of existing RM2 or T2 properties. (See Addenda D.2 for additional discussion.) Nor is a 50-ft height limit consistent with (a) the City Values of having RM integration into our existing Urban Neighborhoods or (b) respecting RM’s density in relation to the adjoining properties (LU-29) that are zoned most commonly as RT or R.

Additional density is more likely to gain broad community support where it is achieved by building broader, not taller. A standard maximum height of 35 ft would place the T2 and RM2 standards on an even footing, in line with the study goals. The addition of a 45ft CUP grants the flexibility to allow an additional story where the lot size and configuration of the surrounding neighborhood permits, without up-zoning to RM3. Although the 45ft CUP would be unavailable to lots less than 60ft wide, the variance process would still be an available route to allow additional height on small lots if warranted.



Height limits for RT districts would be adjusted from the present 40ft to match the R1-R4 limit of 30ft (RT1) and the proposed RM limit of 35ft (45 with CUP) (RT2) respectively. This would put duplexes in line with the existing height limits of the single-family homes they abut and allow townhouses to more closely match the proposed RM heights.

3. **We propose increasing the lot coverage to no more than 50%** from the present 35% limit for RM properties.

Policy LU-11 recognizes the need to “Preserve significant publicly-accessible views through the regulation of structure placement, height, bulk and scale while accounting for other priorities.” Similar to the issues of height, the RM zoning provisions as to lot coverage should contemplate how best to increase density while mitigating the impact on the character of the residential area overall and the housing surrounding the RM zoned property, which often is R4 or RT1, both of which involve much smaller structures.

Based on analysis of existing lots, we believe that retaining a maximum lot coverage of 50% (as opposed to the prior 35%) provides the appropriate balance of the multiple interests at the intersection of R4 or RT1 with RM zoned areas. (See Addenda D.3 for additional comments.)

Without a lot coverage limit, overall lot coverage is restricted primarily by fixed setbacks that do not increase with lot size. The greater coverage possible on larger lots creates a strong incentive to combine lots and create large apartment buildings that dominate their surroundings.

Increasing the lot coverage limit to 50% from the present 35% would allow for a substantial increase in density that approximates existing historical, non-conforming dense low- and mid-rise buildings that cannot be built under the current code, while ensuring that the footprint of new structures aligns with the existing character of their blocks and leaving adequate space for open and green space within the site.

As with the proposed height limits above, RT1 lot coverage would remain at 35% to match the unchanged R1-4 coverage limit, while RT2 coverage would also increase to 50% to match our proposed RM standards.

4. **We request that the East Grand Avenue Overlay District be recognized in a footnote** similar to footnote (k) of Table 66.231 - Residential District Dimensional Standards.

The intent of the Overlay District is to respect and preserve the historic scale and character of Grand Avenue. Specifically, the City codified this in Sec. 67.601 of the zoning code which states that the Overlay District is intended “to provide design standards and building height, size, and footprint limits [consistent with the historic character of the neighborhood], and to reduce the shortage of parking in the east Grand Avenue area.”



5. **We support the elimination of Existing Footnote C, the 9,000 square foot minimum lot size for triplexes or larger (RM2)** so that it is possible to increase density on smaller lots that can support it.
6. **We propose that side setbacks should be narrowed from 9ft to 6ft for lots that are 60ft wide or less.**

Analysis of existing housing stock in Summit Hill shows that many of the existing, multi-family structures in our neighborhood which contribute to its character and allow for high density on smaller lots, have side setbacks of less than the current 9 ft requirement. (See Addenda D.4 for additional notes and examples.)

The proposed ceiling of 60ft reflects the greater impact a fixed setback has on a smaller lot, restricting e.g. a 40ft lot to a 22ft wide principal structure.

We would further suggest that this narrower setback be linked with sidewall height limit, as appears elsewhere in the zoning code.

7. **We support the change to using a variable FAR (Floor Area Ratio) that allows for more flexible building envelopes and encourages higher density development when underpinned by structured parking.**

FAR is a powerful tool that can be used to encourage additional density where it can be done in ways that benefit the residents of those blocks. We suggest the City explore a further subdivision – potentially reserving the maximum FAR of 2.5 for developments that have sufficient proximity to BRT or light rail in addition to structured parking, with a lower maximum FAR of 2.0 for structured parking alone.

We also support the conversion of BC density from using land size to FAR on the basis that, per the proposal, the 35% maximum lot coverage remains for BC zoned lots.

8. **We support keeping parking requirements in place for RM properties.**

All of our recommendations above are based on the assumption that the minimum parking requirements applicable to RM2 buildings remain in place. We recognize that parking availability plays a major role in increasing residential housing density, providing affordable housing, and in promoting the use of public transit. In a current densely populated neighborhood with limited transit options, livability includes access to parking.

Ideally and essentially, parking, transit, and RM zoning should be considered together. Since the City is proposing extensive changes to the parking codes through a separate proposal, we recommend any changes to RM parking requirements be handled in conjunction through that process. Alternatively, we recommend that the City address parking first and then RM zoning.



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SHA will be submitting separate comments to the City regarding the proposed parking changes.

9. **We support the continuation of the “alley bonus” in its new form** as it enhances the viability of many multi-unit residential projects. (See Addenda section D.6.)

We appreciate your consideration of our comments and look forward to working with you on this further.

Regards,

Monica Haas
Executive Director

Peter Rhoades
President



Addenda: Response to RM Zoning Study & Recommended Changes

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Acknowledgements

Summit Hill Association would like to thank the following people who participated in the discussion about and preparation of our response to the RM Zoning Study:

Neighbors: Marit Kucera, Brian Wenger

SHA Board Members: Ann O'Callaghan, Rene Meyer-Grimberg, Hillary Parsons

SHA Executive Director: Monica Haas

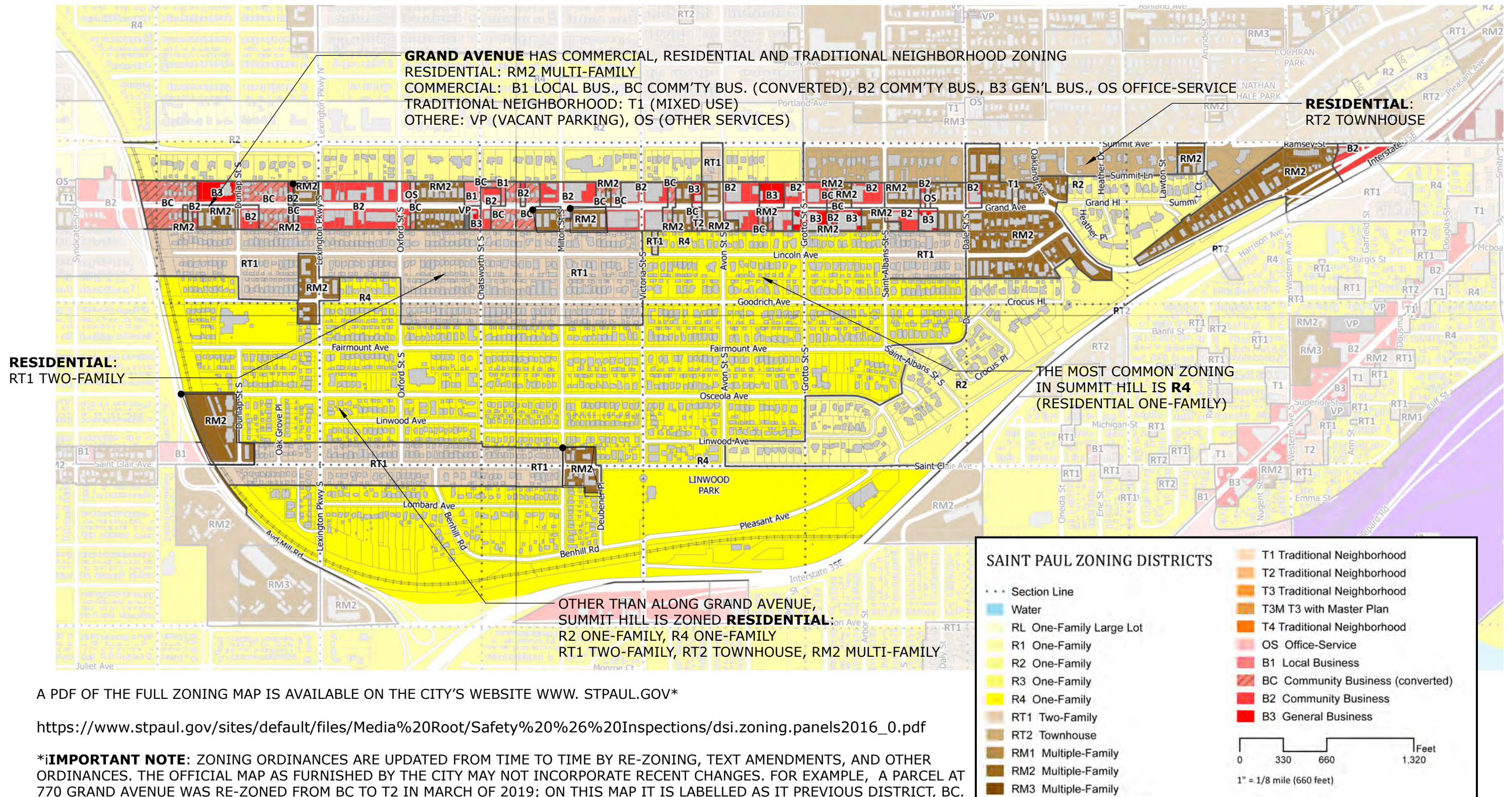
SHA ZLU Committee Members:

Sonja Mason—Who spent hours and hours analyzing and compiling data, photos, charts, and tables

Bridget Alan-Ales, Mike King, Peter Rhoades, Simon Taghioff
Denise Aldrich, *chair*

SUMMIT HILL

CURRENT ZONING



A PDF OF THE FULL ZONING MAP IS AVAILABLE ON THE CITY'S WEBSITE [WWW. STPAUL.GOV](http://WWW.STPAUL.GOV)*

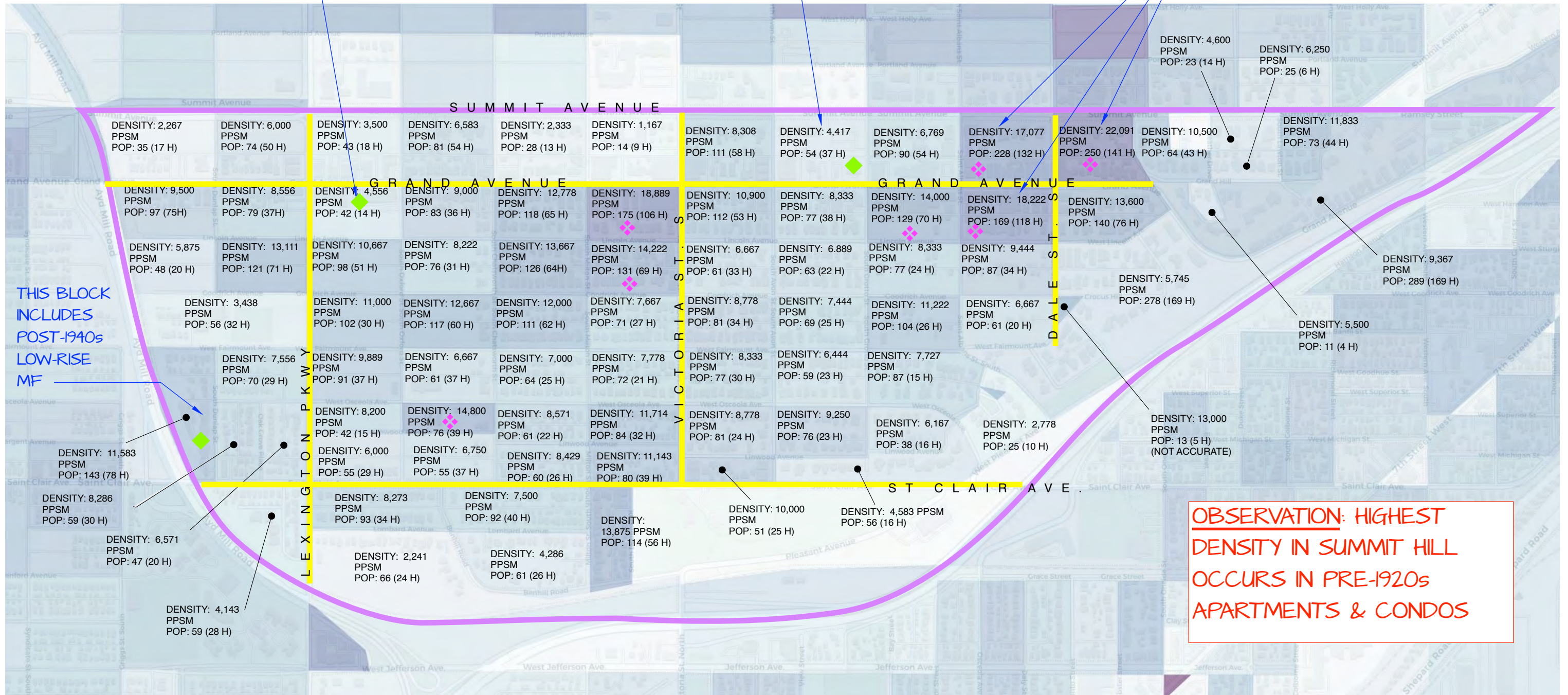
https://www.stpaul.gov/sites/default/files/Media%20Root/Safety%20%26%20Inspections/dsi.zoning.panels2016_0.pdf

***IMPORTANT NOTE:** ZONING ORDINANCES ARE UPDATED FROM TIME TO TIME BY RE-ZONING, TEXT AMENDMENTS, AND OTHER ORDINANCES. THE OFFICIAL MAP AS FURNISHED BY THE CITY MAY NOT INCORPORATE RECENT CHANGES. FOR EXAMPLE, A PARCEL AT 770 GRAND AVENUE WAS RE-ZONED FROM BC TO T2 IN MARCH OF 2019; ON THIS MAP IT IS LABELLED AS IT PREVIOUS DISTRICT, BC.

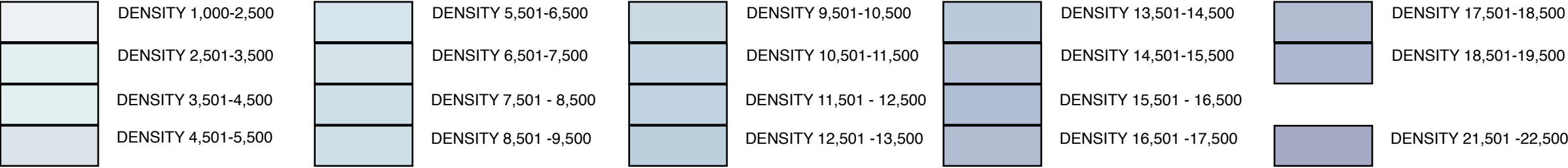
THIS BLOCK INCLUDES
OXFORD HILL CONDOS
(c. 1990s)

THIS BLOCK INCLUDES
5-STORY RM2 TOWER
(c. 1980s)

THESE BLOCKS PRE-1920
MF 2-STORY, 3-STORY
AND 3.5-STORY



OBSERVATION: HIGHEST
DENSITY IN SUMMIT HILL
OCCURS IN PRE-1920s
APARTMENTS & CONDOS



DATA SOURCE:
CITY-DATA.COM.
ACCESSED MARCH 6, 2020

”Based on 2000-2016 data
Displaying: blocks. Zoom out
and pan to view other areas

Read more: <https://www.city-data.com/city/St.-Paul-Minnesota.html>

ADDENDUM C

ANALYSIS OF EXISTING MULTIFAMILY IN DISTRICT 16, SUMMIT HILL

ANALYSIS: EXISTING MULTI-FAMILY IN SUMMIT HILL

Summit Hill neighborhood was built mostly between 1880-1920, and predates the first first municipal Zoning Code in St Paul (1922). Nonetheless, it exhibits traditional neighborhood organization that, while not formally planned, created a structure and planned character. The current zoning districts of Summit Hill were assigned to reflect and reinforce those early organizational ideas, codifying a mix of uses along Grand, multifamily residential uses clustered along and adjacent to arterial roads, and residential-only zoning (mostly single and two family) along the side streets. Please see large scale map in Addendum B, for visual reference.

There are several pockets of **RM2 zoning in Summit Hill**: St Clair at Ayd Mill; St Clair at Milton/Deubener. Lexington south of Grand for a couple blocks; and several sections along Grand Avenue, interspersed with B-zoning. These pockets of RM2 zoning are largely **built in a completely different form than allowed and encouraged by the current RM zoning standards**, which came out of 1970s urban planning ideas. The most dominant multi-family building types in Summit Hill are small and medium sized apartment/condominium complexes. These structures are generally brick or stone, 2-3 stories, and, in footprint, they cover beyond current setbacks as well as lot coverage and density limits. **Notably, the vast majority of these buildings are below current zoning height limits**, as well as below the lower height limits of the East Grand Avenue Overlay District. In fact, the impetus for the East Grand Avenue Overlay District was the construction of buildings that were out of scale—e.g. too tall and too massive/monolithic. The importance of building scale is underscored in Policy LU-29, “**Ensure that building massing, height, scale and design gradually transition to those permitted in adjoining districts.**”

These apartments and condominiums provide housing at a variety of price points and are an important component of housing affordability in our neighborhood. They also provide housing in different types and sizes, with different amenities, appealing to different types of households and people at different life stages. The style and historic massing are also important aspects of neighborhood. Based committee and community feedback at our five meetings, these are the qualities and aspects of the existing multifamily that are most appreciated and prized. At the same time, it needs to be acknowledged that lack of on-street parking for these residences contributes to the on-going parking problems in Summit Hill. Most have had parking added where there was room, but are below current

zoning parking minimums. While the RM Study and the Parking Study are being conducted separately, the issue of parking does greatly impact RM zoning and we encourage that the City addresss them together. Leaving it out of discussion about changes to RM zoning makes the study less complete.

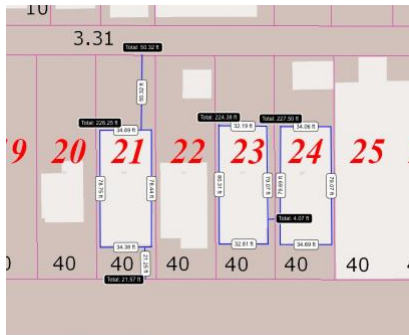
It should also be noted that Summit Hill has a number of small to medium multifamily “legally nonconforming” complexes that are not located in the pockets of RM2 zoning. The majority of the residential streets located in Summit Hill have R4 (Single Family) zoning, with as much as a quarter being zoned RT1 (Duplex). Portions of Summit Avenue are zoned RT2 (Townhouse) which allows up to 4 units per parcel, but with a lot of restrictions. There is more restrictive section of R2 (Single Family) in the southwest corner of the district. In all of these non-RM zoned areas, small multifamily complexes that predate the zoning code exist. In our assessment after detailed study, the greatest opportunity for increased housing supply in Summit Hill exists in RT1, followed by RM2 and RT2, but only if zoning standards are modified to allow development on existing (smaller) parcels.

The factor most limiting increasing density within the current zoning districts already zoned for multi-family (duplex and up) are the dimensional standards. It is also important to note that our existing higher density development occurs in buildings considerably shorter than the 50 feet currently allowed in RM2, and half the height of the 70 feet proposed to be allowed with a CUP. Please see Addendum B with a block-by-block residential density data for Summit Hill and Addendum D.4 for analysis. (Please note that this density map does not include density of commercial businesses, which is substantial along Grand Ave.)

C.1 HISTORIC MODELS OF MULTI-FAMILY

Traditional “Small Lot” Multifamily

Small Complexes, 2-3 Stories, on smaller/single lots, narrow (<9 feet) side yard setbacks. These buildings appear individually, but also sometimes in clusters of two or three. These structures are similar in scale to many of the houses in Summit Hill, though different in form. Some of these MF structures appear on “sideways lots.” The vast majority of these structures were built in the 1920s and prior.



Grand Ave Midblock 4-6 unit 2-story; surface parking behind along alley (approx. 1 per unit)
Est. FAR 0.7-0.9 Lot size 6,000 SF+1/2 Alley
Block Density: 14,000 PPM

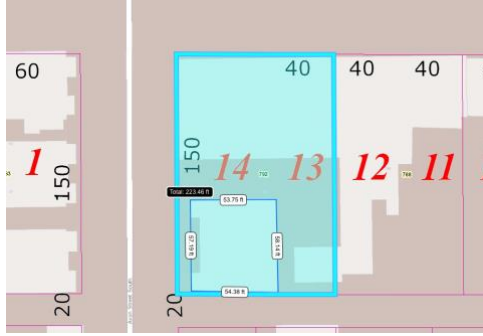
SETBACKS (est.)
Side: < 4 ft* (Does not meet fire code)
Front <12 ft
Rear > 25ft



Residential Street (Legal Non Conforming), 4-8 unit, surface parking behind along alley (approx. 0.5 per unit)
Est. FAR 0.7-1.2 Lot size 6,000 SF
Block Density 14,800 PPM



Residential Street (Legal Non Conforming), 4-8 unit, surface parking behind along alley (approx. 0.5 per unit)
Est. FAR 0.7-1.2 Lot size 6,000 SF +1/2 Alley
Block Density 13,700 PPM



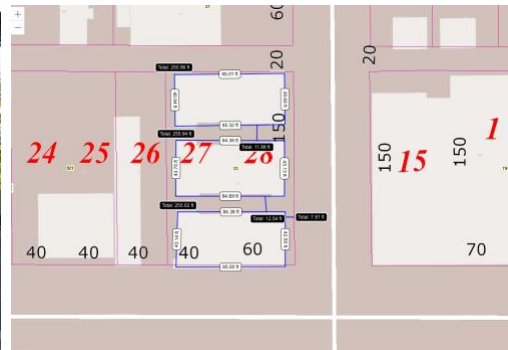
“Sideways Lot” on Side Street (Adjacent to Grand), 4-6 unit, surface & garage parking behind along alley (approx. 1.0 per unit)
 Est. FAR 0.7-1.2 Lot size $100 \times 75 = 7,500$ SF +1/2 Alley*
 Block Density 7,000* PPM

SETBACKS (est.)
 Side <2 st (alley), <6 ft (interior)
 Front <12 Ft
 Rear: > 25 ft

*(Lower density compared block due to many 1-story commercial buildings)

Traditional “Street Car” Multifamily

Medium Complexes, 3-3.5 Stories, on smaller/1.5 and double lots, narrow (<9 feet) side yard setbacks. These buildings appear individually, but also in clusters of two or three. The vast majority of these structures are on Grand Avenue and adjacent sidestreets on “sideways lots.” These MF building were constructed near former street cars stops, and were built in the 1920s and prior.



“Sideways” Corner Lot” on Grand Corner, 12+ unit, surface & garage parking behind along alley (approx. 1.0 per unit)
 Est. FAR 1.5-1.8 Lot size (over several lots) $150 \times 140 = 21,000$ SF +1/2 Alley*
 Block Density 13,700 PPM

SETBACKS (est.)
 Side <2 st (alley), <6 ft (interior)
 Front <12 Ft
 Rear: > 25 ft

*(Lot size based on back portion only—legally this example has been combined into one PID with the Mixed Use building on Grand)

The following three properties are located along the “Grandendale Node.” See Addendum D for more analysis related to this node in Summit Hill.



Arterial Corner (intersection of two major streets)

Lot size: 220 x 150 = 33,000 SF + ½ Alley

Foot print: 14,400 SF (+/-) (combined)

Est. Lot coverage: 44% Est. FAR: 1.3

(3-stories) Block Density 8,300 PPM

SETBACKS (est.)

Side: ~ 6 (street); 16 ft (interior), ~ 30 ft*(inbetween)

Front ~12 ft

Rear ~ 12ft

Observations

It is our assessment that these types of small and medium multifamily form a major component of the essential character of our neighborhood. We are concerned that the proposed changes to RM2 **do not permit** this scale of housing, in favor of taller, more massive complexes. **We would like RM zoning to be revised allow and encourage these smaller scale multifamily options rather than the** tall and monolithic structures that have resulted from current RM2 zoning standards, and which would continue to be allowed in the proposed RM2 zoning. We are also uncertain of how to encourage the pattern of multiple buildings that we have observed. The individual identity of separate structures is an important component of the *perceived* lower density of “Missing Middle” buildings. This model benefits residents as well as neighbors with greater access to light and air for the residents.

C.2 POST-1940 MODELS OF MULTI-FAMILY

Examples of post 1940 MF in Summit Hill



Suburban Style in-fill Multifamily (RM2):
Larger Complexes, 5 Stories, on combined/multiple lots, structured parking (approx. 1.5 per unit)
Est. FAR 1.3 Lot size 21,000 SF Block Density 6,800 PPM



New New Urbanist Multifamily (B2): Larger Complexes, Mixed Use, 4 Stories, on combined/multiple lots, structured parking (approx. 1.5 per unit)



Suburban Style in-fill Multifamily: (RM2)
Larger Complexes, 2.5 Stories, on combined/multiple lots, garages + surface parking (approx. 2 per unit)



3-story, 6-unit Structured Parking. Single lot.
(apprx 2.0 per unit) Est. FAR 1.5 Lot size 9,000 SF Block Density 9,500 PPM* *before construction



3-story condo, 6-8 units, on combined multiple lots. structured parking, (approx. 1.5 per unit)



4-plex (RT2) structured parking (approx. 2 per unit)



Townhouse (RT2). garage parking 2 per unit



Townhouse (RT2). 2.0 story, single lot, detached garage parking 2.0 per unit unit (*this is technically in Summit-U*)

C.3 DENSITY, CHARACTER, AND THE “MISSING MIDDLE”

The historic 1920s (and earlier) multiple family housing are part of the existing character of Summit Hill and increase the variety of housing options in our neighborhood. Key features of these are heights at 2- and 3-stories, and are often located on single parcels or two combined parcels. Buildings are sometimes clustered, but the buildings themselves are distinct, disconnected buildings with separate entrances and yards in between. This maintains the **rhythm of the street**, and **allows access to light and air** as well as **individual identity** to each structure. Much of this housing type is located along Grand and adjacent side streets, as well as along Lexington and St Clair, but there are also many examples of multifamily apartments on residential side streets.

The type and scale of multi-family housing seen in these historic models are what planners have come to call “[the Missing Middle](#).” Some key features of the missing middle include:

- small-footprint buildings
- walkable context
- lower perceived density
- smaller well-designed units
- simple construction
- creates community
- marketability
- historic character



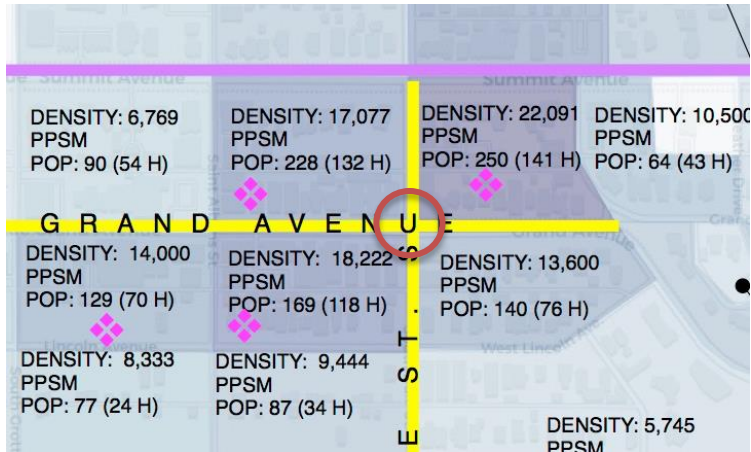
Post-war multifamily construction has several models. The models that fit best with the rhythm and character of the neighborhood are those in keeping with existing scale. Under three stories, individual identity with multiple doors to the street.

Notably, the older pattern for residential density has created greater density than the newer, more monolithic MF models. The block with the greatest residential density in Summit Hill (22,091 people per square mile) is bounded by Dale, Grand, St Albans, and Summit. This has block features several older multifamily 3-story buildings, as well as MF conversions (“converted mansions”). Indeed, all the blocks with residential density above 14,000 are blocks with older “missing middle” multifamily structures. Newer larger and

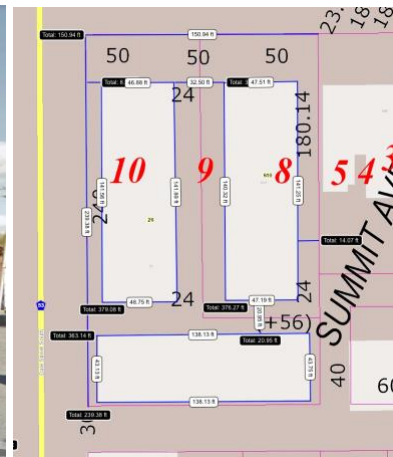
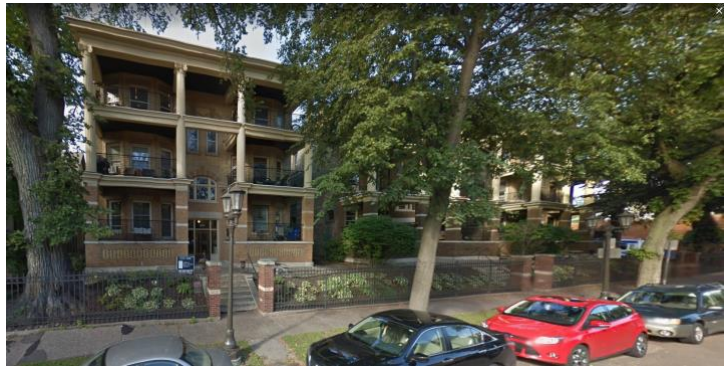
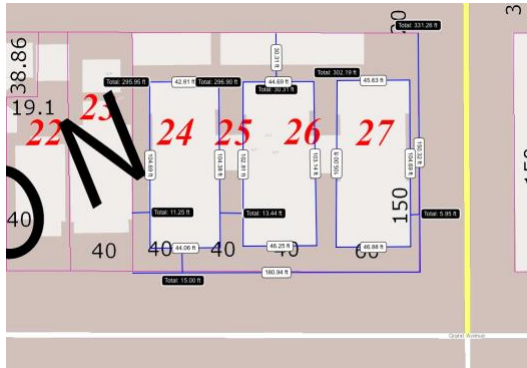
taller projects have not resulted in anywhere near the residential density of historic models. The 5-story tower on Grand and mixed-use Oxford Hill are located on blocks with under 7,000 and 5,000 PPSM residential densities, respectively.

C.4 HISTORIC MODELS OF RESIDENTIAL DENSITY: GRANDENDALE NODE

Summit Hill's Highest Residential Density block is not a block, but rather a node, located at the corner of Grand Avenue and Dale Street. There is a wide variety of housing types: multifamily complexes of 3 or 3-1/2 stories, converted mansion multi-family, mixed use, townhouses as well as 4-plex, triplex and duplexes.



* RAMSEY COUNTY DOES NOT PROVIDE UNIT DATA ON CONDOMINIUMS OR MIXED USE PROPERTIES. WHERE KNOWN, THE NUMBER OF UNITS HAS BEEN ADDED MANUALLY TO THE RAMSEY COUNTY MAP.



ADDENDUM D

SPECIFIC GOALS AND RECOMMENDATIONS TO THE PROPOSED CHANGES TO RM ZONING

OVERVIEW: EXPANDING MULTI-FAMILY IN SUMMIT HILL

We would like to see the changes to R-zoning that would allow new construction that more closely matches traditional MF construction, rather than the suburban style complexes. In particular, related to the “**missing middle**” of small multi-family, Summit Hill currently has a lot of housing options in the “missing middle;” but among the “newer” RM2 projects (post-1940) that model largely does not exist.

The proposed changes to RM express a desire to promote more “missing middle,” but as written do not appear likely to actually accomplish this goal.

Triplex and 4-unit buildings are allowed in RT2 (Townhouse). Changes to RT1 (Duplex) and RT2 (Townhouse) would help increase housing supply in an incremental way. An incremental approach is especially useful in pre-WWII neighborhoods like Summit Hill for the following three reasons. One, incremental increases will have a smaller effect on already dense neighborhoods, requiring less mitigation. Second, established neighborhood rarely have large sites available for larger developments; there is more opportunity for smaller infill projects on smaller lots. Three, smaller projects (and particularly shorter building heights) can preserve and enhance the existing character of these neighborhoods.

D. 1 SPECIFIC COMMENTS OF SUPPORT: MAKE RM2 MORE LIKE T2

Summit Hill Association supports changing to a FAR standard for density and lot coverage, but only in conjunction with making the RM districts more like T districts with regard to height.

Most specifically, we are concerned that the height limits of RM2 are not proposed to be lowered to match T2. The proposed switch to FAR standard increases the allowable lot coverage and effectively raises the height limit to 70 feet with a CUP.

The 1975 intent of RM2 was to allow taller buildings but to increase setbacks to decrease the affect on neighboring properties. In fact, until 2015, the code had side setback that were “half height” rather than 9 feet.

D.2 SPECIFIC SUGGESTIONS: LOWER MAX HEIGHT IN ALL RM PROPERTIES

As noted in the letter, we suggest lowering the height maximum for all RM properties. For context, buildings being “too tall” is frequently cited in community feedback. It was opposition to the 50ft height limit of a new development that led to the 2018 West Zoning Study. In the Jan. 25, 2018 Memorandum “re: West Marshall Avenue Zoning Study,” page 2 notes *“While there seemed to be general support... for the type of medium density residential development allowed under the existing zoning, there was agreement that the height (five stories or 50 feet) and scale of development potentially allowed under existing RM2 zoning is not consistent with the character of surrounding development.... **Most felt three stories allows for increased density and is appropriate but that four and five stories is just too tall to be in character with existing neighborhood development.**”* [emphasis added] Similarly, the East Grand Avenue Overlay District and the existing Table [66.231](#) special footnote (k) Residential District Dimensional Standards for western Grand Avenue near Finn (near UST campus) also create lower height limit heights to improve compatibility with the surrounding neighborhood.

Careful analysis of the residential density maps of District 16 from citydata.com (Addendum B) illustrate that height is not necessarily the key indicator or driver of density. The blocks with the most residential density in D16 occur in areas with buildings less than 4 stories (and with small side-yard setbacks). (Additional discussion previously in Addendum C.4.)



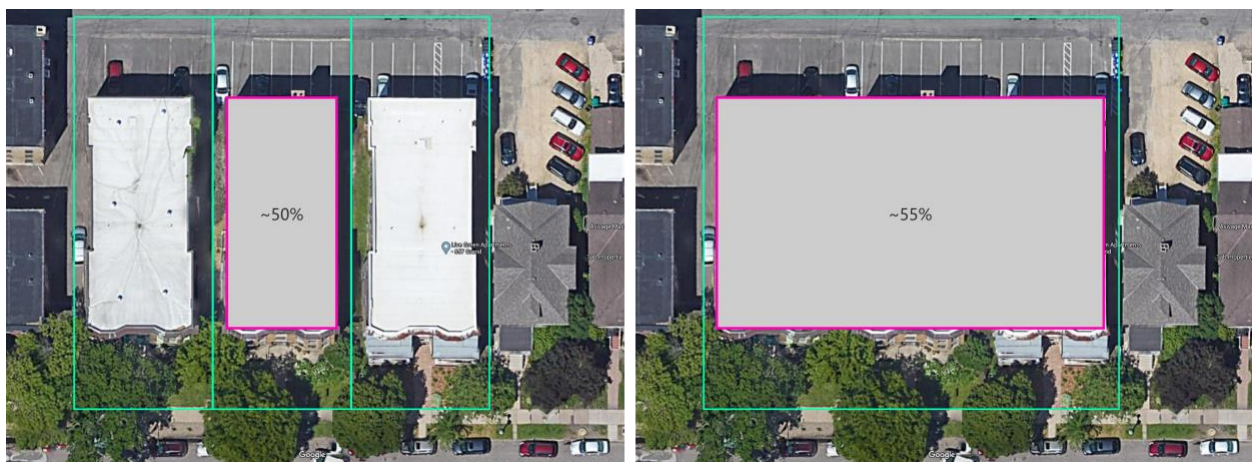
D.3 SPECIFIC SUGGESTIONS: CHANGES TO MAX LOT COVERAGE

Page 38 of the City's RM Zoning Study proposes eliminating the lot coverage maximum in RM and RT 1 and RT2 areas. While we support the goal of allowing increased lot coverage, we do not support an elimination of this standard but propose an intermediary option namely, a lot coverage limit of 50% in RM and RT-1 areas and keeping the 35% coverage limit in RT2.

Members of this group took great pains to study what difference the FAR standards would have on lot coverage (versus the existing system) in a wide variety of property types in District 16 using a spreadsheet that calculates max lot coverage under FAR vs existing limits for different sized lots. In smaller lots (60ft or less), like those common in D16, side setbacks are usually the limiting factor in establishing a building footprint.

As discussed in Addendum C above, many of the older buildings in D16 occupy more than 35% of their lots and yet we consider them an important and **desireable** building type. As discussed above, it is the overall height of a building that is more often perceived as being out of character with surrounding structures.

Therefore, even though we support using FAR as a standard, we believe a max lot coverage standards also needs to be in place. For smaller lots (e.g. 60ft or less), it is difficult to achieve a 2.0 or higher FAR regardless of structured parking or size of the building footprint. However, at larger lot sizes (for example if several adjacent lots were to be developed together), it becomes possible to build a large monolithic building that would be out of scale with the surroundings but not necessarily provide increased residential density.



	A	B	C	D	E	G	H	I	J	L	M	N	O
23													
24		Existing Standards				Proposed							
25		Single Lots		Double Lots		Single Lots		Double Lots					
26	Common Lots	40ft	60ft	80ft	120ft	40ft	60ft	80ft	120ft				
27													
28	Width	40	60	80	120	<-- use figures from the left four columns)							
29	Depth (with alley bonus)	160	160	160	160								
30	Area (sq ft)	6,400	9,600	12,800	19,200								
31													
32	Max coverage at setbacks	2,420	4,620	6,820	11,220	3,080	5,280	7,480	11,880				
33	Max coverage (%)	38%	48%	53%	58%	48%	55%	58%	62%				
34	Adjusted max per code	35%	35%	35%	35%	48%	50%	50%	50%				
35	Adjusted max (sq ft)	2,240	3,360	4,480	6,720	3,080	4,800	6,400	9,600				
36													
37	RM1	(Current)				(New - Surface Parking)				(New - Structured Parking)			
38	(Lot Width)	40	60	80	120	40	60	80	120	40	60	80	120
39													
40	Max Sq Ft. (FAR)					3,840	5,760	7,680	11,520	6,400	9,600	12,800	19,200
41	Min Stories to hit FAR					1.25	1.20	1.20	1.20	2.08	2.00	2.00	2.00
42	Actual buildable stories	3	3	3	3	1.25	1.20	1.20	1.20	2.08	2.00	2.00	2.00
43													
44	Max Built Sq. Ft.	6,720	10,080	13,440	20,160	3,840	5,760	7,680	11,520	6,400	9,600	12,800	19,200
45	Effective Max FAR	1.05	1.05	1.05	1.05	0.6	0.6	0.6	0.6	1	1	1	1
46	Max Units	2	5	6	10	3.8	5.8	7.7	11.5	6.4	9.6	12.8	19.2
47	Min unit size at max	3,360	2,100	2,100	2,100								
48													
49	RM2	(Current)				(New - Surface Parking)				(New - Structured Parking)			
50	(Lot Width)	40	60	80	120	40	60	80	120	40	60	80	120
51													
52	Max Sq Ft. (FAR)	N/A	N/A	N/A	N/A	9,600	14,400	19,200	28,800	16,000	24,000	32,000	48,000
53	Min Stories to hit FAR	N/A	N/A	N/A	N/A	3.12	3.00	3.00	3.00	5.19	5.00	5.00	5.00
54	Buildable per code	5	5	5	5	3.12	3.00	3.00	3.00	4.00	4.00	4.00	4.00
55													
56	Max Built Sq. Ft.	11,200	16,800	22,400	33,600	9,600	14,400	19,200	28,800	12,320	19,200	25,600	38,400
57	Effective Max FAR	1.75	1.75	1.75	1.75	1.50	1.50	1.50	1.50	1.93	2.00	2.00	2.00
58	Max Units	2	6	9	13	9.6	14.4	19.2	28.8	12.3	19.2	25.6	38.4
59	Min unit size at max	5,600	2,625	2,625	2,625								
60													
61	Max units with structured	2	10	14	21								
62	Min unit size at max	5,600	1,680	1,600	1,600								

The full spreadsheet (which allows the user to change any value in a green cell) is available here:

https://drive.google.com/file/d/1QC1obBN4sR4uYjefDMxPH1a096VFL_Kl/view?ts=5ea4b178

D.4 SPECIFIC SUGGESTIONS: CHANGES TO SIDE YARD SETBACKS

Smaller side yard setback for lots 60 feet wide or less: Historical precedents of “missing middle” apartments generally have setbacks less than 9 feet. Smaller side yard setbacks for 2-story would allow the construction of similarly scaled small multifamily housing on smaller lots.

Rationale: The existing nine foot setbacks would result in eighteen feet between buildings, this is considerably more than other areas of building and zoning code. For example, a five foot side yard would meet IBC minimum of ten feet between buildings. A six foot setback would meet the zoning code provision (footnote (i) to Table 65.221) for twelve feet between houses and townhouses on the same parcel. To increase drainage and decrease impervious surface, we support the second standard on smaller lots — a minimum of twelve feet between buildings, which would be achieved with a minimum 6 feet setback for side yards (R3 standard).

D.5 SPECIFIC COMMENTS OF SUPPORT: ELIMINATION OF THE 9,000 SF FOOTNOTE

Summit Hill Association supports the elimination of Existing Footnote (c), “No multiple-family dwelling shall be built, nor shall additional dwelling units be added to an existing building to create three (3) or more dwelling units, on a lot that is less than nine thousand (9,000) square feet in area.”

Allowing the conversion of large houses to duplex or triplexes is a viable way to increase density in an incremental manner, and increase the economic viability of existing structures. The 9,000 SF is arbitrary and creates an undue burden on development and expansion.

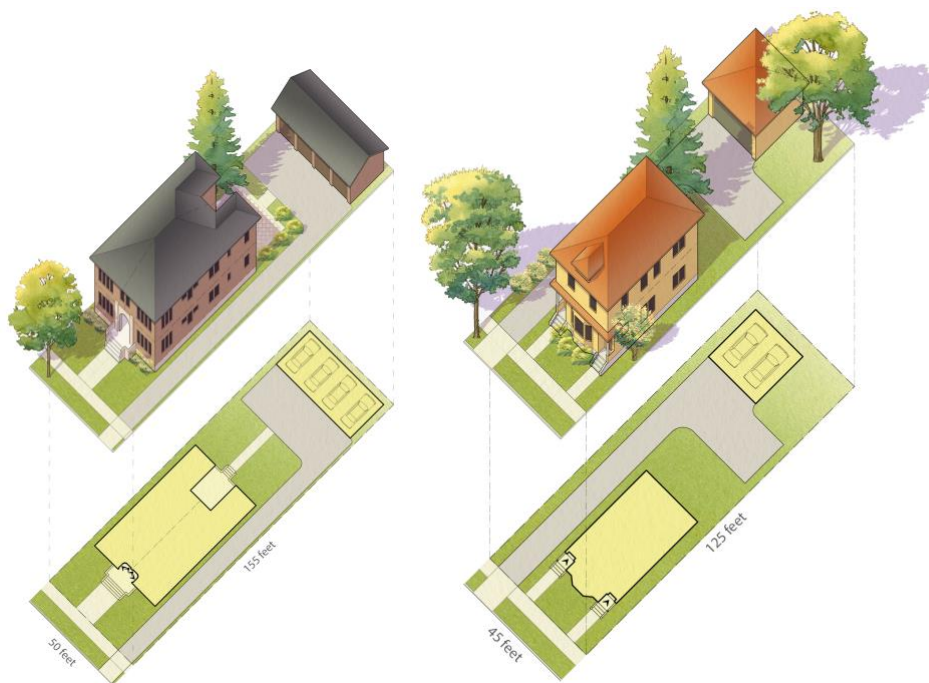


IMAGE SOURCE: <https://missingmiddlehousing.com/types/fourplex#idealized>

Furthermore, smaller buildings are less likely to require expensive systems such as elevators and sprinklers. Increasing the number of lots in which triplexes are permitted should allow more economical development of properties with increased density and more variety of housing types.

D.6 SPECIFIC COMMENT OF OPPOSITION: ELIMINATION OF THE ALLEY FOOTNOTE

Summit Hill Association opposes the elimination of Existing Footnote (b), “In calculating the area of a lot that adjoins a dedicated public alley, for the purpose of applying lot area and density requirements, one-half the width of such alley adjoining the lot shall be considered as part of the lot.”

The intended purpose of eliminating this footnote is to decrease redundancy, *since the “alley bonus” is elsewhere in the zoning code, and its appearance in Table 66 is redundant. We would like to underscore our support for the “alley bonus.” Retaining it as a footnote, while redundant, increases the awareness of accessibility of this information. In a document as complex and dense as the zoning code, we feel that redundancy is less of a problem than not being to locate information. Therefore, we suggest leaving the alley footnote in this section.*

*The alley bonus is important. Without it, the result would be to essentially “shrink” existing lots with alleys (for zoning purposes). For example, for a typical 40 foot lot with a typical 20 alley, the reduction (from current zoning) would be 400 SF. Approximately two-thirds of properties in St Paul have alleys, **the elimination of this provision will decrease density and decrease lot coverage, compared to what is allowed presently; and result in an increase in variance applications.***

The existence of alleys allows access to the rear of a lot without a driveway, effectively allowing lots to be narrower.

The dominant pattern of land use in Summit Hill has narrow deep lots oriented north-and-south along east-west residential avenues. However, there is a repeated compliment to this dominant pattern. **“Sideways” lots occur frequently throughout Summit Hill:** smaller east-west oriented parcels along the side streets. These lots are often smaller than 5,000 SF, or have higher per-square-foot density. Including the alley to these side lots can add 20-25% to the lot size, since the long edge of the lot parallels the alley. Moreover, the Sideways lots compliment what are often larger homes on streets like Lincoln or Summit, with smaller Single-Family and Duplex as well as with “missing middle” multifamily. These Sideways lots are one of the key early urban planning features that increases the diversity of housing types in our neighborhood. We are opposed to lowering their existing lot size by eliminating the Alley Provision.

EXAMPLES OF "SIDEWAYS" LOTS



"Sideways" Townhouse



"Sideways" Duplex



"Sideway" Single Family Lot



"Sideways" Multifamily

ADDENDUM E

OVERVIEW OF PUBLIC TRANSIT AND TRANSPORTATION IN SUMMIT HILL

Summit Hill has moderate transit service. Four bus routes serve Summit Hill: three “Frequent Local Buses” (63, 65, 83) and one “Rush Hour Bus” (70). There are no “High Frequency” routes (service every 15 minutes or better) in Summit Hill. The main transit option for Summit Hill residents is the 63 Bus that runs along Grand Avenue. This bus connects Grand to downtown St Paul and eastward, but lacks a direct Minneapolis connection. North-South transit lines that serve Summit Hill include the 83 on Lexington and the 65 (northbound only) on Dale Street from Grand Avenue. These routes offer connection to the Green Line light rail. The 70 runs along St Clair during rush hour, to offers connection to downtown St Paul as well as to St Paul’s Highland Park neighborhood in the west, but lacks a direct Minneapolis connection.

Summit Hill has good walkability from housing to businesses along Grand Avenue. New technology car sharing (HourCar, Car2Go) and bike sharing have been tried in St Paul, but have discontinued. Summit Avenue is an important bike route.

Nonetheless, most Summit Hill residents, employees, and business customers rely on cars as their main mode of transportation.

Parking has been an ongoing source of conflict between institutions (Hamline Mitchell, Women’s Club, University Club, and churches), retail and business along and adjacent to Grand, as well as residents who lack off-street parking. Area 9 Residential Permit Parking has one of the highest utilization of any of the RPPs.

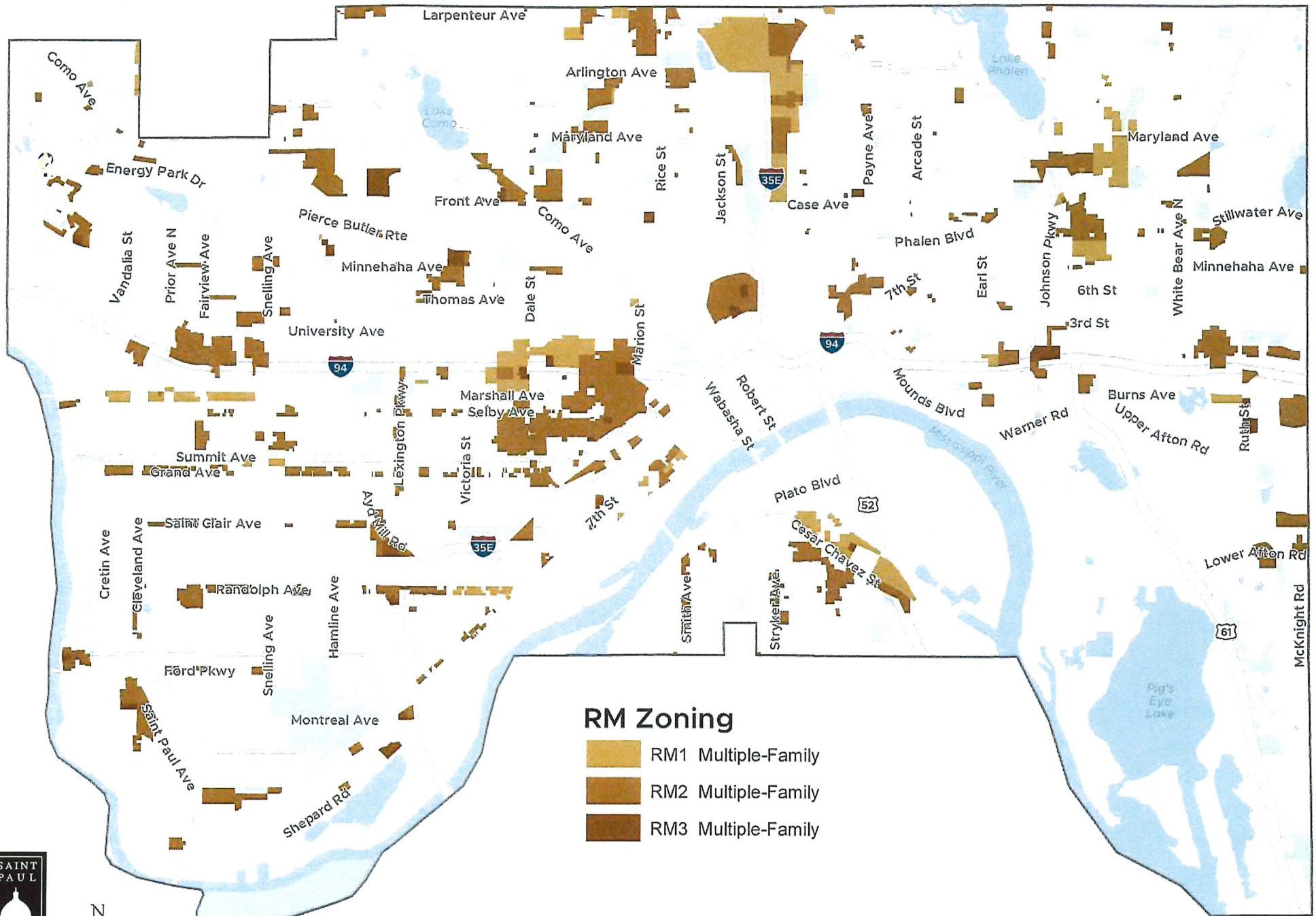
Affordable Housing Units Impact of Proposed FAR Bonuses

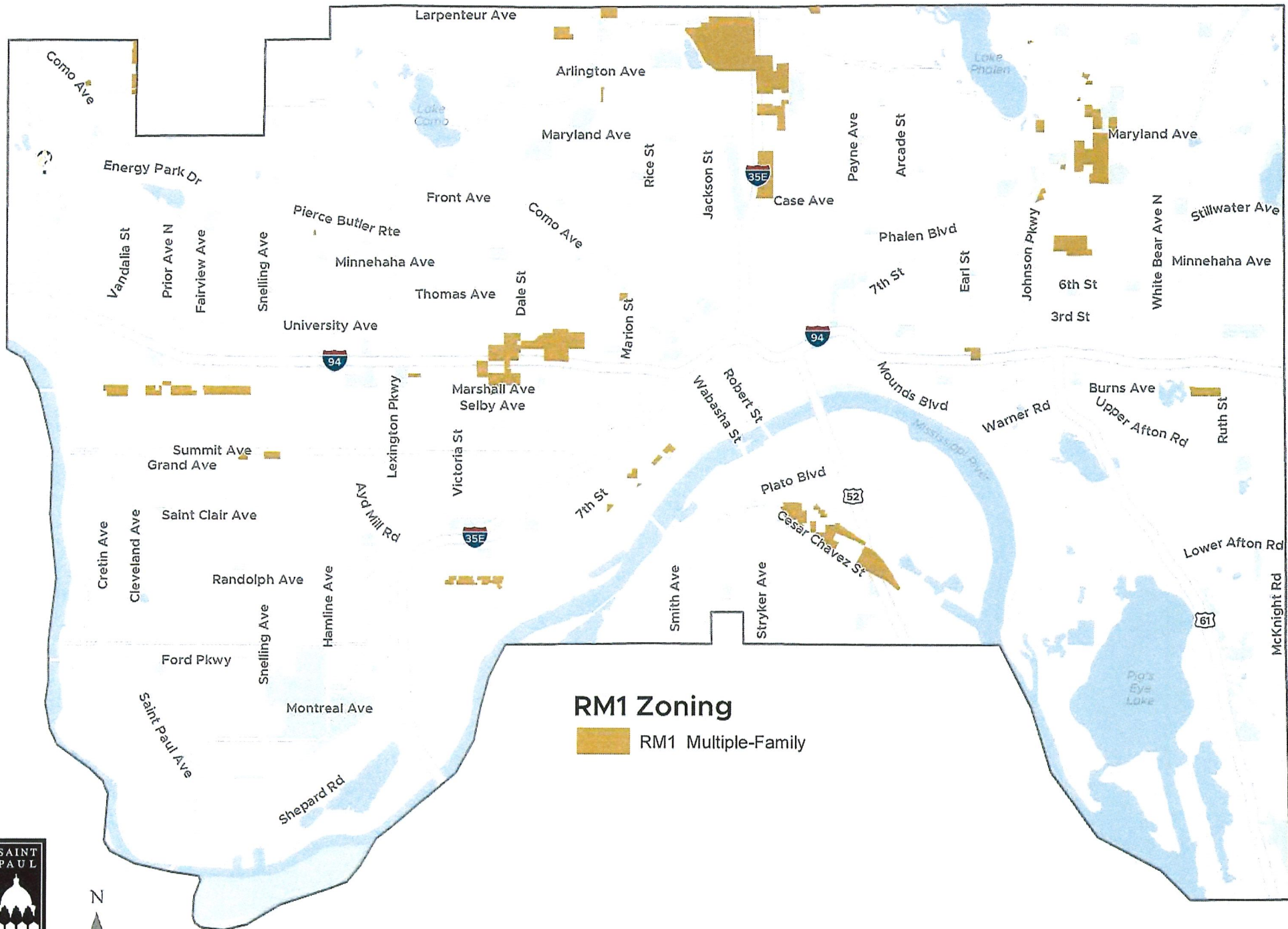
(assuming 700 sq. ft. units with 15% common space)

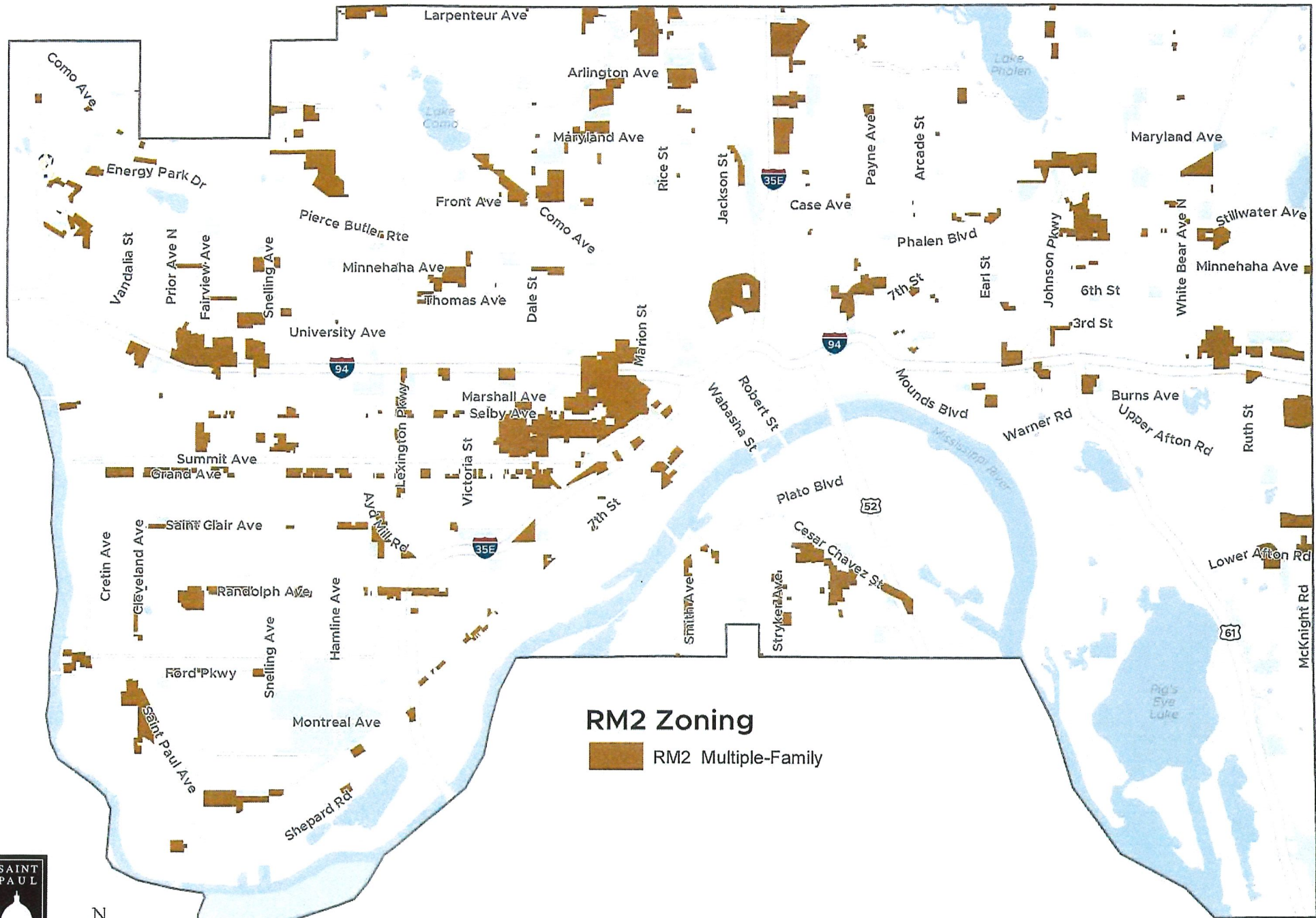
<u>Zoning District</u>	<u>Parking Type</u>	<u>Affordable Amount</u>	<u>Max FAR</u>	<u>Units/Acre</u>	<u>Affordable Units/Acre</u>	<u>Units/20K s.f. lot</u>	<u>Affordable Units/20K s.f. lot</u>	<u>Units/10K s.f. lot</u>	<u>Affordable Units/10K s.f. lot</u>	<u>Units/5K s.f. lot</u>	<u>Affordable Units/5K s.f. lot</u>
RM1	surface		0.6	32		15		7		4	
	structured		1.0	54		25		12		6	
	structured	10%	1.5	81	8.1	37	3.7	19	1.9	9	0.9
	structured	20%	2.0	108	21.6	50	9.9	25	5.0	12	2.5
RM2	surface		1.5	81		37		19		9	
	structured		2.25	122		56		28		14	
	structured	10%	2.75	149	14.9	68	6.8	34	3.4	17	1.7
	structured	20%	3.25	176	35.2	81	16.1	40	8.1	20	4.0
RM3	surface		1.5	81		37		19		9	
	structured		3.5	189		87		43		22	
	structured	10%	4.0	216	21.6	99	9.9	50	5.0	25	2.5
	structured	20%	4.5	244	48.7	112	22.4	56	11.2	28	5.6

(assuming 1000 sq. ft. units with 15% common space)

<u>Zoning District</u>	<u>Parking Type</u>	<u>Affordable Amount</u>	<u>Max FAR</u>	<u>Units/Acre</u>	<u>Affordable Units/Acre</u>	<u>Units/20K s.f. lot</u>	<u>Affordable Units/20K s.f. lot</u>	<u>Units/10K s.f. lot</u>	<u>Affordable Units/10K s.f. lot</u>	<u>Units/5K s.f. lot</u>	<u>Affordable Units/5K s.f. lot</u>
RM1	surface		0.6	23		10		5		3	
	structured		1.0	38		17		9		4	
	structured	10%	1.5	57	5.7	26	2.6	13	1.3	7	0.7
	structured	20%	2.0	76	15.2	35	7.0	17	3.5	9	1.7
RM2	surface		1.5	57		26		13		7	
	structured		2.25	85		39		20		10	
	structured	10%	2.75	104	10.4	48	4.8	24	2.4	12	1.2
	structured	20%	3.25	123	24.6	57	11.3	28	5.7	14	2.8
RM3	surface		1.5	57		26		13		7	
	structured		3.5	133		61		30		15	
	structured	10%	4.0	152	15.2	70	7.0	35	3.5	17	1.7
	structured	20%	4.5	170	34.1	78	15.7	39	7.8	20	3.9







RM2 Zoning

 RM2 Multiple-Family





RM3 Zoning

 RM3 Multiple-Family