



CITY OF SAINT PAUL
Christopher B. Coleman, Mayor

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June 9, 2017

To: Joint Comprehensive/Neighborhood Planning Committee

From: Josh Williams (651.266.6659) and Tony Johnson (651.266.6620)

Re: Final Recommendations on Snelling Ave. South Zoning Study

Background

The Planning Commission held a public hearing regarding the Snelling Ave. South Zoning Study on May 19, 2017. Twelve people spoke at the public hearing, 4 people spoke in support of the proposed changes, 4 people spoke in opposition of the proposed changes, and 4 comments were neutral. The public record was left open for written testimony until 4:30 PM on Friday, May 26, 2017. There were 48 letters in support of the proposed changes received, 25 letters in opposition to the proposed changes received, and 2 neutral letters.

Other information for consideration:

- A number of commenters primarily addressed the property-owner initiated rezoning and CUP application for the proposed LeCesse Corporation development at St Clair and Snelling rather than the zoning study. These comments, in opposition to the development, have been included in the summary below, but are generalized to the study more broadly.
- A number of individuals have suggested, including one in a comment letter, that the City is disregarding/throwing away comments. This may be related to conflation of the zoning study and separate LeCesse Corporation zoning applications. The conditional use permit application was rejected by the Planning Commission on April 21, primarily on the basis of inconsistency with applicable traditional neighborhood design standards. All comment letters received regarding the LeCesse Corporation applications are available on the Zoning Committee's website:
<https://www.stpaul.gov/departments/planning-economic-development/planning/planning-commission/zoning-committee>
- Letters received prior to the Zoning Committee public hearing on April 13, 2017, are posted under the *PACKET* for zoning file "17-015-551" for the April 13th meeting of the committee and

letters received after the hearing under *RESULTS* for the same meeting (see: “Summary packet (draft resolution and additional information”, pages 13-50). The property-owner initiated zoning request was recommended for approval by the Planning Commission, and heard at the City Council. The matter was laid over until June 21. On June 6, LeCesse Corporation submitted a letter to staff providing information regarding the status of the proposed development at St. Clair and Snelling, along with an updated drawing of the Snelling elevation of the proposed building. The letter is included as an attachment to this memorandum.

- A few commenters commented multiple times, either through multiple letters or both written and spoken testimony. The counts include the total number of comments received, as opposed to the number of individual commenters.

Summary of Comments Received

The three district councils that the study area intersects all provided comments in support of the study recommendations. The letter provided by the Macalester-Groveland Community Council (MGCC) explicitly recommends that the City better define “mixed use” as it pertains to development in traditional neighborhood districts. The MGCC letter also notes a number of policies in the MGCC community plan as important considerations in arriving at a recommendation on the zoning study.

A large number of comments received in support of the zoning study recommendations used identical language, urging adoption of the proposed zoning changes without modification, and stating that the study’s recommendations would encourage growth in the Snelling Avenue corridor that would:

- Not overly impact existing neighborhoods or infrastructure
- Allow new residents to take advantage of living in a desirable community in Saint Paul
- Bring more people to existing businesses and expand opportunities for new commercial development
- Promote existing transportation options and support the expansion of transit services

Additional areas of support identified in support of the study recommendations included:

- Support for higher density housing and commercial uses along Snelling Avenue
- Support for higher density as a way to support transit and neighborhood businesses

Comments critical of or in opposition to the study recommendations were more varied in nature. However, several common concerns were expressed:

- Opposition to buildings of 5 or more stories, or of 60-70 feet
- Opposition to large buildings and/or density more generally
- Concerns over increased traffic congestion, parking demands, and negative impacts to pedestrian safety
- Concern that increased density will lead to more crime
- Concern regarding resulting loss of access to sunlight and/or privacy for adjacent homeowners

- Concern that zoning changes/development will devalue nearby single-family homes
- Concern about changes in neighborhood character

Some less common but more specific concerns were also found in the comments received, including citing of Comprehensive Plan and neighborhood plan policies. These included:

- Statements that proposed rezonings are inconsistent with the Comprehensive Plan strategy to “preserve and promote Established Neighborhoods” because they will negatively impact adjacent properties that are within Established Neighborhoods and/or because Snelling Avenue should be considered part of these neighborhoods
- T traditional neighborhood zoning lacks necessary controls on “building footprint” and minimum lot size and is not well understood by many people
- T traditional neighborhood zoning is not conducive to the type of mixed-use development it is purported to promote
- Traffic noise, both existing and potential increases

Finally, commenters requested several specific modifications to the proposed zoning changes:

- Retaining the current R4 zoning for the parcels on the east side of Snelling at Lincoln and Goodrich, rather than the proposed change to T2
- T2 zoning for the parcels on the east side of Snelling between St. Clair and Stanford, with some support for T3 “at the corner” (the majority of the block is currently proposed for rezoning from B2 to T3).

Analysis of Comments

The comments on the study, taken as a whole, suggest several broad themes:

Support for Design Standards

Both those in support of the zoning study recommendations and those in opposition talked about the importance of walkability and pedestrian-friendliness. This is consistent with the study recommendations for the adoption of T traditional neighborhood districts. The properties identified for T traditional neighborhood zoning in the study almost all front arterial or collector streets, and the traditional neighborhood design standards require that buildings orient toward the front of lots, both in terms of placement of building mass and requirements for a pedestrian-friendly interface with the public realm. While the site plan and conditional use permit applications submitted by LeCesse Corporation for the proposed development at St. Clair and Snelling are a separate matter from the zoning study, it is notable that the basis for rejection of those applications by the Planning Commission centered around the inconsistency of the proposal with those same design standards. However, it is also notable that while the applications were denied by the Planning Commission, there was significant discussion at both the Zoning Committee and the full Planning Commission over whether the proposed development did or did not comply with the design standards. There may be room for refinement of these standards.

Commercial Vitality

There was also broad consensus among commenters that maintaining and growing commercial vitality in the Snelling Avenue corridor is very important. This was coupled with desire a definition of “mixed-use”. Further study of how to both protect and promote commercial vitality, and how commercial versus residential developments are evaluated under the zoning code should be considered.

Pedestrian Safety

Although it is not an issue directly germane to the zoning study, the issue of pedestrian safety was brought up by many commenters. Some commenters suggested that additional traffic associated with higher density redevelopment could exacerbate these problems. Theoretically, a better pedestrian realm and support for transit should increase pedestrian safety.

Density and Height are Key Areas of Disagreement

The primary area of disagreement between supporters and opponents of the study recommendations could be characterized in a few questions: How much density is too much density, and how tall is too tall?

Concern over how neighboring land uses will interact with new uses is, as one commenter pointed out, at the core of zoning decisions. The challenge in Saint Paul, and along portions of the Snelling Avenue corridor in particular, is finding a way to achieve the City’s stated goal of accommodating higher-density development along what is designated as a Mixed-Use Corridor while still assuring there are appropriate transitions to less-intensive uses and development patterns in the neighborhoods that flank the corridor. T traditional neighborhood zoning has several features which make them a good fit for striking this balance. Where T traditional neighborhood districts abut RL-RT2 districts (single-family and duplex zoning), allowed heights are reduced at property lines to 25 feet. Increased height is allowed as distance from rear and side property lines increases. The impact of this is to push the mass of buildings toward the front of a development lot, typically along an arterial or collector street.

T traditional neighborhood districts do allow greater density as measured by floor area ratio compared to the corresponding commercial and residential districts (for example, T2 vs. B2 vs. RM2) and allow for increased potential heights, particularly in T3 with a conditional use permit. In comments received, the concerns over height and density, and the resulting potential impacts on shade, privacy, traffic, and parking were centered on two locations, as noted above. In addition to recommending further study of T traditional neighborhood traditional neighborhood design standards, two amendments to the recommended zoning changes could be made:

Location One: East side of Snelling, between Lincoln and Goodrich (Immanuel Lutheran Church)

- Current Recommendation: all parcels R4 to T2
- Alternative Recommendation: all parcels R4 to T1

This change would reduce the number and intensity of potential future uses of the property, addressing concerns that the changes will incentivize redevelopment of the property and that future development will adversely impact adjacent residential properties.

Location Two: East side of Snelling, between St. Clair and Stanford

- Current Recommendation: all parcels B2 to T3, except for southernmost parcel to T2
- Alternative Recommendation: T3 for northernmost two parcels, T2 for remainder of block

This change would reduce the number and intensity of potential future uses of the property, addressing concerns that the changes will incentivize redevelopment of the property and that future development will adversely impact adjacent residential properties.

The Committee should discuss and decide which option to recommend in both cases.

Proposed Changes Based on Further Analysis

- Rezone 68 Snelling Ave South from B2 to T3. (The initial recommendation recommended T2.) This parcel, along with 64 Snelling S and 58 Snelling Avenue S are all owned by Lincoln Commons Ltd. The study generally recommends zoning continuous parcels that are owned by a single entity to the same zoning designation in order to avoid split zoning for possible future redevelopment sites.
- Rezone the northern 11 ft. of 498 Brimhall from B2 to R4. 498 Brimhall is currently split zoned R4/B2. The property is a single family dwelling and the majority of the parcel is zoned R4 single family. If the parcel remains split zoned any future development north of the parcel on 1540 Brimhall could be built at a higher height at the setback line abutting 498 Brimhall because the provision that limits the height to 25' when T traditional neighborhood districts abut RL – RT2 would not apply.

Staff Recommendation

Staff recommends that the Planning Commission forward the Snelling Avenue South Zoning Study to the Mayor and City Council with a recommendation to adopt all zoning changes as proposed herein, and include additional recommendations for future study as identified herein.



June 6, 2017

Ms. Sonja Butler, Planning Commission Secretary
City of St. Paul, Minnesota Planning Commission
1400 City Hall Annex
25 Fourth Street W
Saint Paul MN 55102

Dear Ms. Butler,

This letter is to provide a status report on our plans for the redevelopment of the SE corner of Snelling Ave. at St. Clair. As of this writing, our request for the rezoning of the property to T-3 has been approved by the district council and the planning commission. The city council has delayed review of this rezoning application until June 21, however, to allow the South Snelling Master Rezoning Proposal (which also calls for this parcel to be changed to T-3) to catch up.

The planning commission has reviewed the South Snelling Master Rezoning Proposal favorably but has asked that it be reviewed and approved by a reorganized subcommittee so that the record of its approval can be complete. It is not clear to us whether the South Snelling Master Rezoning Proposal will reach the city council by June 21, 2017, however.

Under any circumstances, we urge that the property be rezoned to T-3 to allow its sale and redevelopment as a mixed use property. As many on the council are aware, the property is in severe disrepair and the redevelopment of the property to a higher density use will be consistent with transit corridors of other major cities.

We also strongly support the flexibility of height at this property through a CUP. Due to a high water table, the typical below grade parking design is not possible, leaving few options other than building height to achieve the desired density.

During the course of review and approval of our proposal by the district council and the planning commission, we have listened carefully to the concerns of neighbors and interested citizens, particularly relating to height, density and streetscape. As a result, we have reduced the unit count from 185 to 128, reduced the height of the building and also added three townhouse residences along Snelling Avenue to add scale to the streetscape and improve the walkability for residents and visitors.

While not required, we have also added 20 parking spaces for neighboring commercial interests to allay their concerns about lost parking on the corner parcel, which currently serves as a surface parking lot. We have pulled the apartments back from the easterly boundary along the alley and confirmed through our architects that we do not shadow the neighbors to the west or the solar panels of the business to the north. We believe that these changes meet and exceed the reasonable needs and concerns of the neighborhood residents, and fulfill the spirit and intent of the applicable ordinances and codes of the city of St. Paul.

We enclose for your information the latest Snelling facade rendering showing the townhouses and the floor plan for the included parking.

In the meantime, a title dispute has surfaced with respect to the corner parking lot which impacts the ability of the Sellers to convey title. The matter is now in the Court of Appeals and it is unlikely a final determination will be reached in the near term. Settlement discussions are underway but the outcome of these discussions is uncertain.

In light of this ongoing title issue, the contract purchasers have halted all development activity relating to this property until such time as there is further clarity and resolution of the title issue. Due to these issues, the contract purchasers have not filed a CUP and site plan application for our new plan.

We regret having to halt our efforts to greatly improve this blighted property. We have expended significant funds for architectural and civil design, legal, and planning on the project but are hopeful that the title issue will be resolved. We also are hopeful that the council will move to apply a T-3 zoning to the property, recognizes the challenges to the property that necessitate the CUP, and concurs that the current site plan represents the best feedback from designers and neighbors.

Thank you for your consideration of our development proposal.

Sincerely,



Thomas J. Hayden
Director of Development



Butler, Sonja (CI-StPaul)

From: Johnson, Tony (CI-StPaul)
Sent: Friday, June 09, 2017 3:03 PM
To: Butler, Sonja (CI-StPaul)
Cc: Williams, Josh (CI-StPaul)
Subject: FW: Green Line Residential - ADU's?
Attachments: image005.jpg

From: Nicholas Harris [<mailto:harrisn13@gmail.com>]
Sent: Wednesday, June 07, 2017 5:24 PM
To: Johnson, Tony (CI-StPaul)
Cc: Williams, Josh (CI-StPaul)
Subject: Re: Green Line Residential - ADU's?

Mr. Johnson,

Thank you so much for your prompt and informative reply. And yes - you may absolutely include my email in your compilation of public comments next week. Thank you for that, and thank you as well for asking.

Wishing you a great evening as well, and thank you once again.

Sincerely,

Nick Harris

On Wed, Jun 7, 2017 at 4:53 PM Johnson, Tony (CI-StPaul) <Tony.Johnson@ci.stpaul.mn.us> wrote:

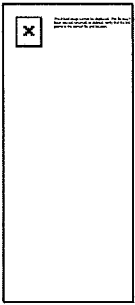
Good afternoon Nick,

Unfortunately your house is not in area where we currently permit accessory dwelling units. They are currently only allowed within a half mile of University Avenue, between Emerald Street and Lexington Parkway. As a part of the zoning study we recommend that the planning commission consider permitting ADU's along the A-Line, but we decided that that should be considered as part of a follow-up text amendment, and I'm not sure if that will happen any time soon.

Would you mind if I added your email to the other public comments that will be considered by the neighborhood planning committee next week? I think that showing that there is interest in ADU's might help us move that forward quicker.

If you have any more questions feel free to send another email or give me a call.

Have a great night,



Anthony Johnson

City Planner

Planning & Economic Development

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P: 651-266-6620

Tony.Johnson@ci.stpaul.mn.us



Making Saint Paul the Most Livable City in America

From: Nicholas Harris [mailto:harrism13@gmail.com]

Sent: Wednesday, June 07, 2017 12:10 PM

To: Johnson, Tony (CI-StPaul)

Subject: Green Line Residential - ADU's?

Mr. Johnson,

My wife and I have been following the Planning Commission's Snelling Ave South Zoning Study with great interest, as we live just off Snelling on Sargent Avenue, just four houses off of Snelling and therefore right near the A-Line stop at St Clair. Do you know if the current proposal includes any possibility to classify lots like ours to permit ADU's?

At one point that had been in the mix with the other elements of the Zoning Study. We are shortly going to need to replace our rather old garage with something new, and would like to see the zoning change to help us make it permitted to build an ADU if possible. Otherwise, it appears we should apply for a conditional permit if I'm reading the codes correctly.

Any replies to the above are greatly appreciated! Especially regarding the conditional permit process if that is the path forward ... I am having a hard time following the code in terms of what the process there might be, so

any help or steps to follow would be most helpful if you have anything you can easily share. Many thanks for your time.

Sincerely,

Nick Harris

1563 Sargent Ave

Butler, Sonja (CI-StPaul)

From: Johnson, Tony (CI-StPaul)
Sent: Friday, June 09, 2017 3:04 PM
To: Butler, Sonja (CI-StPaul)
Cc: Williams, Josh (CI-StPaul)
Subject: FW: Snelling Ford Ave. Zone Study

-----Original Message-----

From: Williams, Josh (CI-StPaul)
Sent: Wednesday, June 07, 2017 5:19 PM
To: Johnson, Tony (CI-StPaul)
Subject: FW: Snelling Ford Ave. Zone Study

-----Original Message-----

From: Williams, Josh (CI-StPaul)
Sent: Thursday, May 18, 2017 12:51 PM
To: Johnson, Tony (CI-StPaul)
Subject: FW: Snelling Ford Ave. Zone Study

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-----Original Message-----

From: Susan Duffy [<mailto:ssuuzzy@yahoo.com>]
Sent: Thursday, May 18, 2017 12:41 PM
To: Williams, Josh (CI-StPaul)
Subject: Snelling Ford Ave. Zone Study

I would like to see more RT1 included in the study especially off of Snelling and Ford Parkway. I find that the area that shares alleys with some of the more dense proposed areas would benefit from being rezoned as well.

Currently, I own a Duplex located at 391 and 393 Brimhall. I lived there for 7 years and might have my children live there when they are older. I also grew up in a Duplex. Several of my friends and family own and live in Duplexes.

As a full time Landlord, I find that RT1(Duplexes and Triplexes) are one of the most affordable and livable housing options. RT1 gives those that cannot afford a single family the 'fell' of a R1-R4 with half the cost. At the same time, they blend in well with R, T, and RM zones.

I hope that the city incorporates Two-Family dwellings in the long term planning of Saint Paul especially off of the areas charted for growth. They are wonderful for affordability, growth, aging parents or children, blend well, easy to maintain, and a great starter home or last home. Sadly, They are becoming rare (cannot remember ever seeing one built) in Saint Paul. Unlike new high density housing, one can easily build, own, and maintain a Duplex. It may help for options for single family homes whose values may decrease being adjacent to new zoning. I could also see it having an impact to reduce tear downs in our more traditional single family neighborhoods.

Susan Duffy
657 Fairview Ave. S
Saint Paul, MN 55116