



CITY OF SAINT PAUL
Melvin Carter, Mayor

25 West Fourth Street, Ste. 1300
Saint Paul, MN 55102

Telephone: 651-266-6565

DATE: March 14, 2019

TO: Planning Commission

FROM: Comprehensive and Neighborhood Planning Committee

SUBJECT: Recommending *Saint Paul for All: 2040 Comprehensive Plan* for Adoption, and Forwarding to Mayor and City Council

BACKGROUND

City staff have been working on the update of the City's Comprehensive Plan since 2015. Required by the Metropolitan Council every 10 years, with a 20-year planning horizon, this update was guided by the Planning Commission's Comprehensive and Neighborhood Planning Committee.

After extensive public engagement in 2016-2017, the Planning Commission released a preliminary draft of *Saint Paul for All: 2040 Comprehensive Plan* in March 2018 to allow district councils, community organizations, adjacent cities, agencies having jurisdiction with the city limits, and the Metropolitan Council the opportunity to give preliminary feedback. Based on feedback, staff proposed changes to the draft document that were incorporated into the official public hearing draft.

The Planning Commission released the official public hearing draft of *Saint Paul for All: 2040 Comprehensive Plan* on November 2, 2018 and held a public hearing on January 11, 2019. Fourteen people spoke at the hearing. Before the record closed on January 14, 2019, approximately 20 letters and e-mails were received, and 60 people left comments on the City's website. The minutes from the January 11 hearing are attached, as are all the written comments received by EOB January 14, 2019.

WHAT WE HEARD DURING THE PUBLIC COMMENT PERIOD

In general, people seemed pleased with the draft. We heard:

1. The Plan identifies the right issues and values for Saint Paul.
2. City staff are to be commended for reaching out to so many people in creating the plan; it reflects the diverse voices across the city.
3. The Plan does a good job of planning for growth, especially by increasing density and land use diversity along transit corridors.

But we also heard that there are a few things the Plan still needs to do:

1. The Plan needs to better explain how equity and inclusion show up in the policies.
2. Sustainability and resiliency are fundamental concepts for responsible growth. The Plan should better articulate how the City will integrate these values into its work, and what its climate mitigation and adaptation strategy is.
3. The City should create an economic development strategy that emphasizes inclusion and a more racially equitable economy.
4. The Plan needs to go farther in saying how the City will address the shortage of affordable housing in Saint Paul.

5. The Plan should go farther in promoting density and transit – through more designated Neighborhood Nodes, an end to single-family zoning, and no parking minimums.

A few general themes emerge from the comments:

1. Strive for higher density
 - a. Increase the number of Neighborhood Nodes (NN)
 - b. Eliminate parking minimums/lower parking maximums
 - c. “Upzone” like Minneapolis did – no exclusive single-family districts
2. Lead on climate change mitigation (via more NNs), adaptation (via more density)
 - a. Energy conservation
 - b. Food access
 - c. Transit, mobility
 - d. Increasing resilience of communities
3. Transportation/mobility
 - a. Support for the design modal priorities (pedestrians first, then bicyclists, etc.)
 - b. Specific street design ideas to reduce truck/freight conflicts with other modes
 - c. Improve snow removal, especially for pedestrians
 - d. Do not build the Ayd Mill extension
4. Equity is foundational to policy and all City activities
5. Aging in community – comments reinforced the need to consider this trend as we plan for housing, jobs, transportation, parks, etc.
6. Parks
 - a. Clarify equity goals
 - b. Access is very important, especially to the Mississippi River
 - c. Call out “No net loss” from charter
 - d. Consider parkland zoning
7. Implementation/accountability for action

COMMITTEE REVIEW OF COMMENTS

In preparation for Comprehensive and Neighborhood Planning Committee review of the comments, staff entered all (1200+) comments into a matrix and organized them by chapter. Each chapter lead then responded to the comments for their chapter, sometimes after reconvening their work groups or discussing issues with the entire Comprehensive Planning Team. The full matrix contains the following information:

1. who made the comment;
2. what chapter the comment refers to;
3. the comment;
4. a response to the comment (Notes);
5. whether a change in the draft Plan is recommended by staff; and
6. if a change is recommended, what it is (new language, additional maps or figures).

From the full matrix of all 1200+ comments, staff then prepared a shorter matrix for CNPC review that included only those comments for which staff was recommending a change in text, maps or figures. The Committee went through every Y comment and made a recommendation for a change to the draft document. The “Y” matrix shows both the staff and Committee recommendation where a change in text, map or figure is proposed.

Both matrices are available on the Planning Commission website:

1. The complete matrix, with all comments and responses.
2. An abridged version showing only those comments where a change in the draft Plan is recommended by the CNPC.

The primary themes or topics discussed by the CNPC were:

- **Equity.** How do we define it in a meaningful way, and how is it incorporated into policies and implementation? What is the outcome we're trying to achieve? How do we measure progress or success? These questions are especially important when talking about housing and economic development/access to jobs.
- **Housing Justice.** How do we address Saint Paul's history of housing discrimination? This has repercussions today, as we see significant racial disparities in homeownership.
- **Neighborhood Nodes.** Many new Neighborhood Nodes are recommended, based on public comment. How do we ensure that all neighborhoods benefit from this core development strategy? Also, the Plan needs to be clear that the circles shown for each Neighborhood Node represent the general location but not the actual size of the Node.
- **Potential Future Right-of-Way Connections.** Three are identified in the document – Ayd Mill, Kittson and Pierce Butler. How do we ensure that all modes (not just cars) are possible on these road extensions?
- **Water quality.** How do we ensure surface and groundwater quality? How would a local "no net loss" wetlands policy benefit Saint Paul?

Because of the length of the comments and responses, it will not be possible to go through every one at the Planning Commission meeting on March 22, 2019. **The Committee requests that Commissioners review its recommendations and be prepared to vote on all changes at the March 22, 2019 meeting.**

COMMITTEE RECOMMENDATION

The Comprehensive and Neighborhood Planning Committee recommends that the Planning Commission:

1. approve the changes to the November 2, 2018 draft of *Saint Paul for All: 2040 Comprehensive Plan* as noted in the abridged matrix; and
2. forward the amended version of the Plan to the Mayor and City Council for final adoption.

Attachments:

1. Minutes from January 11, 2019 Planning Commission Hearing
2. All Written Comments Received by January 14, 2019
3. Matrix showing CNPC Recommendations for Changes to the November 2, 2018 draft of the 2040 Comprehensive Plan
4. March 6, 2019 memo from Parks & Recreation Commission from Mike Richardson
5. Recommended Narrative Revisions in Parks Chapter, 2/22/19
6. Map LU-4 Significant Public Views

	OFFICIAL PUBLIC COMMENT NOV 2 - JAN 11 Source	Chapter	General Comments	Lang. Chng? (Y/N)	Notes	Staff Recommendation	Pg #	CNPC Recommendation
32	Nancy O'Brien Wagner	General	All maps should clearly show which spaces are parklands and cemeteries. It is misleading to not differentiate these spaces when outlining things like "poverty rates" or "households with out cars."	Y	Maps IN-1 through IN-11 should show parks and open space areas on the base.	Add parks and open spaces to Maps IN-1 through IN-11.	15-27	Agree
33	Nancy O'Brien Wagner	General	Since the bulk of St. Paul's infrastructure and neighborhoods were established by 1950, it would be useful to have a graph showing population per decade from 1950-2018, with estimated growth for next thirty years. Also – show decreasing household size numbers. We still have a lower population than we did then – if more people understood that, plus the lower household sizes, public conversations about density and growth (or re-population) would be better.	Y	We agree that this is useful information.	Add charts on population and household size to Appendix A in Introduction chapter.	14	Agree
57	Center for Economic Inclusion	General	The Center advocates that all municipalities incorporate the following elements into their comprehensive plans: 1. A goal to develop a racially equitable economy; 2. Data analysis, consistently disaggregated by race, to identify racial disparities in access to affordable housing, transit, living wage jobs and economic development; 3. Policies and strategies specifically designed to close the identified racial disparities; 4. A commitment to evaluating the impact of these policies and strategies on people of color, and to adapting those policies and strategies based on that evaluation.	Y	Equitable economic development is a core City value. The City's current efforts around community wealth-building are, at their heart, geared towards equitable economic development. The City will work on metrics to monitor the impact of the Comprehensive Plan's policies on people of color, so that our success at meeting our equity goals can be better assessed.	Add a short-term item to Implementation: <u>Prepare a comprehensive, city-wide economic development strategy, with a focus on racial equity. It should include local-scaled topics, such as Neighborhood Nodes, as well as regional issues, such as transit and workforce development.</u>		Add a short-term item to Implementation: <u>Prepare a comprehensive, city-wide economic development strategy, with a focus on racial equity. It should include local-scaled topics, such as Neighborhood Nodes, as well as regional issues, such as transit and workforce development.</u> This may or may not be a chapter of the Comprehensive Plan.
61	Center for Economic Inclusion	General	Re: Goal - It is significant that the City of Saint Paul has recognized equity as a challenge and opportunity, a theme, and a core value in the draft plan. The Center encourages the comprehensive plan to go further by including a specific goal for creating a more racially equitable economy. It is important to have a goal because it helps to focus policies, drive implementation and structure accountability through evaluation.	Y	A goal for a racially- equitable economy is better suited to an economic development strategy.	Add a short-term item to Implementation: <u>Prepare a comprehensive, city-wide economic development strategy, with a focus on racial equity. It should include local-scaled topics, such as Neighborhood Nodes, as well as regional issues, such as transit and workforce development.</u>		Agree
118	Andrew Singer	General	Then you don't define "equity". Do you mean "equity between modes" (bike, pedestrian, transit, car)? ...or do you mean racial equity as in "we have to prioritize this project because it's in a largely Hmong or African American neighborhood"? This is important because, as written, "Safety and equity" are more important than "maintenance" or the age of a given piece of infrastructure.	Y	We mean racial and social equity.	Amend T-1 to read: Prioritize safety and racial and social equity benefits in project selection, followed by support....		Agree

127	Payne-Phalen Community Council	General	64. On the matter of organization, one more! The work in that came of this project is excellent. It can be completely exhilarating, but let's face it, it can be truly exhausting. PED staff and a group of commissioners has been hard at it for at least four years now. Four years! It's a team effort, but members of the team, key authors, analysts, and internal reviewers and all of the internal allies who provided substantive guidance and help along the way deserve some very well-earned credit! You deserve to take a bow. You deserve a curtain call. And you know that there is a particularly low-key way that that is done in the public sector. In other words: Include an acknowledgements page!	Y	There will be one in the next draft.	Add Acknowledgments page.	Agree
158	District 1 Land Use Committee	Housing	pg. 114: H-22, add "Any promotion of housing ownership will be done with a racial justice lens and with an eye to remedy of historic housing discrimination."	Y	A reference to racial justice could be added to the introduction of the Housing Chapter. Page 30 of the Land Use chapter discusses applying the Metropolitan Council's Areas of Racially Concentrated Poverty to Saint Paul. Page 110 and Page 164 in Appendix A discuss affirmatively furthering fair housing.	Add a reference to historic housing discrimination to H-20. Add an Implementation item to study the history of housing discrimination in Saint Paul to fully understand how it has influenced housing choice and opportunity.	Amend H-20 to read: Collaborate with partner agencies, lenders and the real estate industry to reduce racial disparities in homeownership that could be attributed to unequal access to fair lending, or intentional steering to specific neighborhoods <u>or historic housing discrimination.</u> Add a Short-Term item in the Housing Chapter Implementation chart to read: <u>Study the extent and impact of historic housing discrimination in Saint Paul.</u> Add to the end of the second-to-the-last paragraph on p. 7: <u>Into the future, overcoming the effects of historic housing discrimination is a challenge and an opportunity to build community wealth for all Saint Paul residents.</u>
159	District 1 Land Use Committee	Housing	pg. 116: H-26, add an acknowledgement that the City is aware that tenant rights need additional support and will work to increase them.	Y	DSI conducts landlord training sessions. There is an existing State of Minnesota Tenant Remedies Act.	Revise Policy H-26 by replacing the word "Create" with "Increase."	Agree

161	District 1 Land Use Committee	Housing	Add a new policy that reads "encourage landlord education on topics of affordable housing options including the acceptance of Section 8 vouchers."	Y	The City Council adopted a resolution in July 2018 asking City staff to explore ordinances to reduce barriers to finding rental housing, including increasing acceptance of Housing Choice Vouchers. This work is underway.	Revise H-26 as follows: <u>Increase</u> awareness around tenant and landlord rights, responsibilities, best practices and resources to <u>increase access to rental units and decrease conflicts that could lead to evictions.</u>	Agree
182	Jason Peterson	Housing	While I am very excited for the creation of the Housing Trust Fund and the initial investment into this fund, at this time, there is no dedicated funding source to keep this fund going. I would strongly encourage you to commit to funding affordable housing via a Housing Trust Fund model by making a dedicated source of funding a goal in the 2040 Comprehensive Plan.	Y	Several policies in the plan already call for collaboration with partner agencies, including H-20 (to reduce racial disparities in homeownership), H-22 (down payment for first-time home buyers), H-35 (explore mechanisms to ensure that affordable ownership units remain affordable). The appendices specifically reference numerous strategic partnerships.	Amend H-42 to read: "Pursue public and private funding sources, <u>including local sources</u> , for affordable housing preservation and production. Amend H-43 to read: "Encourage and support state and federal legislation that preserves existing programs and provides new funding, <u>including a dedicated funding source</u> , for affordable ownership and rental housing.	Agree
208	Rick Varco	Housing	H-47: Delete "compatible with the pattern and scale of the neighborhood". This is not a valid public policy goal. Cities can't grow and develop, if we restrict them to existing patterns.	Y	OK	Revise Policy H-47 to read as follows: Encourage high-quality urban design for residential development that is <u>sensitive to context</u> , but <u>also</u> allows for innovation and consideration of market needs.	Agree
221	Luke Hanson	Housing	In H-47, the language "compatible with the pattern and scale of the neighborhood" should be deleted. This goal should never supersede the priorities of adding dense, affordable housing, and this language can only serve to block needed density.	Y	OK	Revise Policy H-47 to read as follows: Encourage high-quality urban design for residential development that is <u>sensitive to context</u> , but <u>also</u> allows for innovation and consideration of market needs.	Agree
236	Center for Economic Inclusion	Housing	Policy H-20 states "Collaborate to reduce racial disparities in homeownership that could be attributed to unequal access to fair lending or intentional steering to specific neighborhoods." The Center applauds the City for this policy to reduce racial disparities in homeownership. However, it is not clear why it limits City action to disparities that are based on unequal access to lending or intentional steering to specific neighborhoods. Are there data to show that these are the primary drivers of the homeownership gap? What role does the difference in generational wealth play?	Y	OK	Revise Policy H-20 to read: Collaborate with partner agencies, lenders and the real estate industry to reduce racial disparities in homeownership that could be attributed to unequal access to fair lending, intentional steering to specific neighborhoods, <u>historic housing discrimination or possible factors.</u>	Revise Policy H-20 to read: Collaborate with partner agencies, lenders and the real estate industry to reduce racial disparities in homeownership that could be attributed to unequal access to fair lending, intentional steering to specific neighborhoods, <u>or historic housing discrimination. or possible factors.</u>

279	Housing Justice Center	Housing	<p>While it is laudable that the city intends to “explore ways” this does not rise to the level of a strategy to meet the needs that will produce any number of units of housing that is affordable to households at 30% AMI or below. The plan should include the specific strategy of creating a funding source for that creates housing opportunities for households at 30% and below AMI.</p>	Y	OK	<p>Amend H-42 to read: “Pursue public and private funding sources, <u>including local sources</u>, for affordable housing preservation and production. Amend H-43 to read: “Encourage and support state and federal legislation that preserves existing programs and provides new funding, <u>including a dedicated funding source</u>, for affordable ownership and rental housing.</p>	Agree
282	Housing Justice Center	Housing	<p>The implementation steps outlined in the current iteration of the plan are in many cases too vague, general, or tentative to meet the standards set out in the Land Use Planning Act. Not only does the current plan fail to meet the legal standard of creating a set of specific strategies with sequenced implementation steps to carry out those strategies, but it also fails to take advantage of the opportunity to develop new ways to address the growing need for more affordable housing. This should include new local revenue sources and new policies that support the development and preservation of affordable housing opportunities, with a focus on meeting the needs of households at or below 30% AMI.</p>	Y	<p>The Mayor created the Housing Trust Fund to focus on the preservation of existing and production of new affordable housing, and the protection of people living in affordable housing. Policy H-18 addresses deeply affordable rental housing. H-27 addresses preserving project-based Section 8. H-31 supports new affordable housing throughout the city. H-32 supports the use of resources for affordable rental housing to various levels of affordability. H-33 and H-34 support affordable home ownership. H-36 encourages family-sized affordable housing; policies related to affordability continue through H-45.</p>	<p>Revise language on page 169 in Appendix B to add advocating for increases in local funding sources. The third bullet should read: Advocate for increased Federal, State, <u>and local funding</u> for affordable housing (target incomes: ≤60% of AMI, with focus on ≤30% of AMI).</p>	Agree

284	Housing Justice Center	Housing	<p>There are a variety of other important issues that the plan mentions but does so in a manner that is too vague to be meaningful. Among these are:</p> <ol style="list-style-type: none"> 1. H-15 does not include sufficient detail or analysis to be understandable of actionable. 2. H-16 mentions policies and practices to create housing choice but describes neither the practices nor the policies 3. H-20 states that the city will collaborate to address steering, but does not mention any specific ideas, policies, or strategies to address intentional steering 4. H-28 states that the city will do research about best practices and policies to address housing barriers in the tenant selection and screening process. The city should do the research as part of the comp planning process and set out specific plans for adoption of those best practices in the comp plan itself. 5. H-35 says that the city will “explore” mechanisms to ensure long term affordability of HRA developed homeownership opportunities. The city should instead “develop and implement” strategies to this end. 6. H-41 should be changed to include the adoption controls and the policies consistent with the analysis of Inclusionary Zoning feasibility in the implementation toolkit on page 177. 	Y	The Saint Paul Comprehensive Plan is a high-level policy document, intended to set the stage for subsequent work and funding. Regarding inclusionary zoning, the City Council has asked City staff to study it and report back to the Council by the end of 2019.	Revise H-35 to read: "Work with partners to explore <u>develop and implement</u> mechanisms to ensure that affordable ownership units developed with City/HRA assistance remain affordable beyond the first generation of owners."	Agree
286	Housing Justice Center	Housing	Saint Paul has the opportunity to create new strategies, develop new resources, and enhance its ability to leverage state and federal dollars. Saint Paul is projected to continue to grow, but without more dedicated local funding sources for affordable housing development, it will remain at a competitive disadvantage in accessing state resources and will continue to fall behind in meeting its housing needs.	Y	The Mayor and City Council created the Housing Trust Fund to focus on the preservation and production of affordable housing, and the protection of people living in affordable housing.	Amend H-42 to read: "Pursue public and private funding sources, <u>including local sources</u> , for affordable housing preservation and production. Amend H-43 to read: "Encourage and support state and federal legislation that preserves existing programs and provides new funding, <u>including a dedicated funding source</u> , for affordable ownership and rental housing.	Agree
300	Jessa Anderson- Reitz	Housing	In H-47, the language “compatible with the pattern and scale of the neighborhood” should be deleted. This goal should never supersede the priorities of adding dense, affordable housing, and this language can only serve to block needed density.	Y	OK	Revise Policy H-47 to read as follows: Encourage high-quality urban design for residential development that is <u>sensitive to context</u> , but <u>also</u> allows for innovation and consideration of market needs.	Agree

309	Jeff Zaayer	Housing	Policy H-1 aims to maintain the housing stock by enforcing property maintenance codes. While it is important that all housing is safe and healthy for those who occupy it, I am concerned that without additional supporting policies this may create a disparate impact on people with low and fixed incomes. Language could be added about allocating funds for those who are unable to pay for property maintenance on their own. Or ensuring landlords pay for upkeep without transferring the burden to their tenants. Additionally tenants protections for landlords who fail to perform upkeep and maintenance would mitigate or help avoid and disparate impacts resulting from this policy.	Y	DSI has done a racial equity assessment of its enforcement process to ensure enforcement is not done in a way to disparately impact racial or ethnic groups. Complaint information is confidential. Policy H-26 calls for creating awareness around tenant and landlord right, responsibilities, best practices and resources to decrease conflicts that could lead to eviction.	Reorder the first few policies to make the ideas flow better. H-1, H-4, H-3, H-2, H-5...this groups the maintenance and enforcement policies, then goes into the code enforcement/TISH/health-safety policies.	No change necessary.
340	John Slade	Housing	H22 – Any promotion of housing ownership will be done with a racial justice lens and with an eye to remedy of historic housing discrimination.	Y	Page 30 of the Land Use chapter discusses applying the Metropolitan Council’s Areas of Racially Concentrated Poverty to Saint Paul. Page 110 and Page 164 in Appendix A discuss affirmatively furthering fair housing.	Add a reference to historic housing discrimination to H-20. Add an Implemenattion item to study the history of housing discrimination in Saint Paul to fully understand how it has influenced housing choice and opportunity.	Amend H-20 to read: Collaborate with partner agencies, lenders and the real estate industry to reduce racial disparities in homeownership that could be attributed to unequal access to fair lending, or intentional steering to specific neighborhoods <u>or historic housing discrimination.</u> Add a Short-Term item in the Housing Chapter Implementation chart to read: <u>Study the extent and impact of historic housing discrimination in Saint Paul.</u> Add to the end of the second-to-the-last paragraph on p. 7: <u>Into the future, overcoming the effects of historic housing discrimination is a challenge and an opportunity to build community wealth for all Saint Paul residents.</u>
341	John Slade	Housing	H26 – Add We are aware that tenant rights need additional support and will work to increase them.	Y	OK	Revise Policy H-26 by replacing the word “Create” awareness with the word “ <u>Increase.</u> ”	Agree

346	John Slade	Housing	H44 – “Make achieving the Met Council Affordable Housing goals a top priority both in planning, legislative priorities, and comprehensive plan language.”	Y	OK	Revise H-44 to read: “ Strive to achieve Make achieving the Metropolitan Council’s affordable housing goals a <u>top priority both in planning and legislative efforts.</u> ”	Agree
366	Payne-Phalen Community Council	Housing	35. Appendix A, p. 138 Chart 9 seems confusing. There is no label on column. Is the row the tenant income % AMI? Is the column how many people within that % AMI can afford their unit? (example: 75% of tenants with <30% AMI could afford their unit) Or is there a reference to the total rental units?	Y	The column shows the percentage of units within each AMI percentage category that are affordable. The total number of affordable units varies for each AMI category where n= the number affordable units in each AMI category.	Add the following label below the 100% to 0% column: “% affordable units”	Agree
367	Payne-Phalen Community Council	Housing	36. Appendix A, p.144 Naturally-Occurring Affordable Housing. Error on map number referenced. The last sentence on the page refers to Map 7 for rental units coded by age, but it should be Map 8	Y		Change the text on page 144 from Map 7 to Map 8.	Agree
368	Payne-Phalen Community Council	Housing	37. Appendix A, p. 152 Charts 23 & 24: Both say Cost Burden by Race, but chart 24 says (Owner). Is chart 23 supposed to be (Renter) or total? The chart legend shows both the blue and gold colors are for 2010-2014. Is one of these colors supposed to be years 2005-2009 (one of the sources noted)?	Y		Edit the label on Chart 23 by adding “(Renter)” and revise the years on the legend for the blue category from 2010-2014 to 2005-2009 in three separate places.	Agree
369	Payne-Phalen Community Council	Housing	38. Appendix A, charts on pages 157-159 Cost Burden by Household Type: The chart legend (p. 159) shows both the blue and gold colors are for 2010-2014. Is one of these colors supposed to be years 2005-2009 (one of the sources noted)?	Y		Edit the legend on page 159 by revising the years on the legend for the blue category from 2010-2014 to 2005-2009 in three separate places.	Agree
371	Payne-Phalen Community Council	Housing	40. Appendix B, p. 171 Decrease Homelessness: An Emergency Housing Plan to support tenants displaced by non-compliance is important. Tenants should be provided information on resources available, including emergency housing and legal information or contacts, so they can find out what their options are if they are out short-term or permanently from their residence. If an eviction notice is due to the landlord’s inaction it helps to have someone to talk to that explains your options, rights and responsibilities.	Y		Revise the table on page 171 in Appendix B to remove reference to an Emergency Housing Plan under the “Plans/Official Controls/Programs” heading. It is already covered under “Regulations/Agreements/Plans.”	Agree

374	Heritage Preservation Commission	HP	The Heritage Preservation Commission Executive Committee was concerned after reviewing the comments of the Comprehensive and Neighborhood Planning Committee of the Planning Commission and the subsequent denial recommendation for the local heritage site designation of Saint Andrew's Church at 1031-1051 Como Avenue. Comprehensive and Neighborhood Planning Committee members based their recommendation on statements made that heritage preservation was not a listed core value in the Comprehensive Plan of the City of Saint Paul, when in fact the current and proposed Comprehensive Plan have dedicated chapters to heritage preservation. To avoid future confusion, on behalf of the Heritage Preservation Commission we request that a statement be added to the 'Vision and Core City Values' section of the 2040 Comprehensive Plan for the City of Saint Paul: "Respecting Our History and Culture - we are a city that believes that the preservation of buildings, sites and other objects having a historical or cultural value which contributes to the uniqueness of Saint Paul is a public necessity and is required in the interest of the welfare of the people of Saint Paul."	Y	OK	Add a Core City Value: <u>Respecting Our History and Culture - we are a City that believes that the preservation of buildings, sites and other objects with historical or cultural value contributes to the uniqueness of Saint Paul, is a public necessity and is required in the interest of the welfare of the people of Saint Paul.</u>	12	Agree
381	Saint Anthony Park Community Council (SAP)	HP	Note that in the sidebar "Definitions" on p.205, The term Reconstruction should be highlighted and made a separate paragraph.	Y	Agree	Highlight/bold "Reconstruction" and start a new paragraph.		Agree
386	Payne-Phalen Community Council	HP	b. As a city of St. Paul's age, with multiple layers of development over the course of its history, and with so many critical historic resources, the city really ought to have administrative demolition review for each and every demolition permit granted. The positive and lasting benefits far outweigh whatever concerns might linger.	Y	This has been under consideration at various times by City staff, the HPC and City Council members. It would require amending, by ordinance, Chapter 73 of the City's Legislative Code.	Revision of Chapter 73 should be added to Figure I-6 in the Implementation Chapter.	223	Add the following to Figure I-6 in the Implementation Chapter: <u>Explore the Heritage Preservation Commission's authority and process regarding demolition permits as part of any revisions to Chapter 73.</u>
387	Saint Paul Parks and Recreation Commission	Implementation	How do we uphold the plan and accountability?	Y	An annual Planning Commission evaluation is one potential step, along with Parks Commission and neighborhood groups or individuals holding the City accountable.	Add a bullet to p 216 under General Implementation: " <u>work with the Planning Commission to prepare an annual evaluation of implementation progress, involving other City departments and commissions as appropriate.</u> "	216	Agree

391	Bob Morrison	Implementation	Once approved, what process has been established to monitor and measure whether or not assumptions made remain realistic and relevant, and for identifying and rectifying any unintended consequences as a result of actions taken as the City implements the 2040 Comprehensive Plan?	Y	The Planning Commission will work with staff to create a process to monitor implementation and measure progress towards reaching our goals. evaluation is one potential step, along with neighborhood groups or individuals holding the City accountable.	Add a bullet to p 216 under General Implementation: " <u>work with the Planning Commission to prepare an annual evaluation of implementation progress, involving other City departments and commissions as appropriate.</u> "	216	Agree
410	Andrew Singer	Implementation	We also need data to evaluate how effective our engineering measures have been. On Marshall, for example, bike and pedestrian crashes have actually risen somewhat since we rebuilt the street with medians and bike lanes. Is this due to increased bike and pedestrian usage rates or a flaw in our design? Since we don't have count data longer than half a year before project implementation (and only for a few spots), we have no idea whether our infrastructure spending improved safety or made it worse.	Y	Noted	Add to Figure I-2 as an on-going item: " <u>Improve pedestrian and bicyclist mode share and crash data to inform and evaluate investments.</u> "		Agree
412	Payne-Phalen Community Council	Implementation	b. As a city of St. Paul's age, with multiple layers of development over the course of its history, and with so many critical historic resources, the city really ought to have administrative demolition review for each and every demolition permit granted. The positive and lasting benefits far outweigh whatever concerns might linger.	Y	This has been under consideration at various times by City staff, the HPC and City Council members. It would require amending, by ordinance, Chapter 73 of the City's Legislative Code.	Add the following to Figure I-6 in the Implementation Chapter: <u>Explore the Heritage Preservation Commission's authority and process regarding demolition permits as part of any revisions to Chapter 73.</u>	223	Agree
433	Payne-Phalen Community Council	Introduction	It seems that the "Values" are incorporated into page 10 of the draft, but it's not clear what happened to the "Focus Areas." Where the "Focus Areas" just intended as part of the public process or were they meant to be foundational to the document too? We recommend the latter. Maybe this section is an update of the Focus Areas? In any case, the words and intentions are all in the right direction, but the organization is confusing. Most importantly, there's no clear, specific thread throughout the rest of the document that amplifies these as organizing themes. They come up here and there if one is deliberately looking for them, but they aren't always so obvious. And that dilutes their overall impact on being the underlying policy rationale.	Y	The Focus Areas are intended to be foundational to the document. They are mentioned in the first paragraph of the introduction on p. 6, and are called "overarching issues." Perhaps adding a sentence or two about why staff decided to integrate these ideas into every chapter, rather than create individual chapters for each of them, will help raise their visibility.	Change the phrase "overarching issues" to " <u>focus areas</u> " in the first paragraph on p. 6. Add the following sentence in front of the last sentence of the first paragraph on p. 6: <u>These focus areas are foundational to the City's policies in every chapter of the Comprehensive Plan.</u>		Agree
437	Payne-Phalen Community Council	Introduction	b. Because equitable employment for many St. Paul residents is not an automatic byproduct of citywide economic growth, "economic development," should be included in the parenthetical series of that includes land use, housing, transportation, etc.	Y	Agree, but use the phrase "community wealth creation" to speak to broader efforts towards community-based economic development.	Add "community wealth creation" to read: "The Comprehensive Plan supports the equitable geographic allocation of public funding and investment (especially for land use, housing, transportation, <u>community wealth creation</u> , public utilities, and parks) to ensure that the residents in these areas have the resources they need to thrive and prosper."		Agree

446	Dustin Schroeder	Land Use	I would like to see a neighborhood node at Snelling and Minnehaha avenues. There is an A-line stop at Minnehaha and I've seen a good amount of investment in properties in the first block west and east of Snelling in this area and would like to see this area continue to develop (all along Snelling and nearby blocks). I think multifamily up to 6 units should be allowed in the first block on either side of Snelling from University up to Minnehaha at least. I also am interested in seeing details related to property setbacks and allowed density, particularly in neighborhood nodes. I support very accommodating building setbacks (near zero feet on front, sides and back) on lots in neighborhood nodes to allow for less restrictive housing options.	Y	OK	Add a Neighborhood Node on the Future Land Use Map (Map LU-2) at Snelling-Minnehaha.	Agree. Also add a note in the sidebar on p. 33 or on Map LU-2 that the circles indicating Neighborhood Nodes are representative of the boundary of the node, not the actual boundary of the node.
447	Amy Riley	Land Use	I live in LexHam, a community unlike many others in that we are an extremely close knit and very active group of neighbors. While I recognize that Selby between Lexington and Hamline is a transportation corridor, I absolutely do NOT want to see any giant mixed use residential and retail buildings going up like what happened at the corner of Selby and Snelling. Our community is quiet, walkable and safe and I oppose these two policies specifically: Policy LU-29: I disagree with increasing density towards the center of the Selby Snelling node between Lexington and Hamline. Policy LU-34 : I oppose structures being built higher than 3 stories for multi-family housing. Thank you for the opportunity of making my voice heard. Please keep the charm and peace in LexHam. Amy "Lucas" Riley. President of the Lexington Hamline Community Council	Y	The Selby-Milton NN listed on p. 33 was actually put at Selby-Dunlap (between Lexington and Hamline) on the map on p. 43.	Move NN from Selby-Dunlap to Selby-Milton.	Agree
448	Sara Dovre Wudali	Land Use	Policy LU-29: I agree with increasing density towards the center of the Selby Snelling node between Lexington and Hamline. I would like there to be more walkable retail in our neighborhood--restaurants, shops, doctor offices. I'd like to see some of the apartments/condos that may be built reserved as low-income options, so a mix of low, middle, and upper income housing. Please not all luxury apartments. But that said, I'd want to protect the Central HS garage and Youth Express on Dunlap/Selby. Adding more retail/appts might necessitate parking restrictions for streets with no alleys like Hague and Laurel so that residents have places to park.	Y	OK	Move Neighborhood Node to Selby-Milton per Lex-Ham comments	Agree
452	Jake Reuter	Land Use	I'm writing today to ask that you please use St. Paul's 2040 comprehensive plan update as an opportunity to eliminate parking minimums in our city. I believe that it is critical to allow people investing in our city to determine the amount of parking they need independently. This is an important issue for people considering building ADUs, those investing in small businesses, and building larger housing developments. We need to reduce barriers to building more opportunity in our city and shift away from our existing car-dominant transportation system.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>	Agree. Also, amend T-38 to read: Seek opportunities to improve the environmental sustainability of rights-of-way in the city, such as through shared, stacked-function green infrastructure (SSGI), and planting trees to reduce the heat island effect, <u>and reducing the amount of land devoted to parking.</u>

453	Kory Andersen	Land Use	First and foremost I think that St Paul is in a unique position to draw a stark contrast to the Minneapolis 2040 Comp Plan. We've seen the document. In St Paul we should go farther in making our city a better and more livable place under the challenges of global warming and quickly diminishing resources. Among many strategies, we need to be bold by eliminating parking minimums altogether. I appreciate the roundabout solutions that the comp plan draft currently has to address parking, but given the reality of our world, it is somewhat tone deaf. For decades we have prioritized cars to the detriment of our city. It is time to swing it back and stop preserving SFH owner's non-existent right to parking in the public right of way.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>	Agree
454	Kory Andersen	Land Use	2. Make sweeping zoning changes along major arterials to allow for much higher density housing and mixed goods. Some of the most charming multi-unit buildings in SP are currently illegal under the zoning code. Make it work again! Saint Paul has some beautiful neighborhoods and it makes sense to protect them...but the give should be along major routes.	Y	LU-33 and LU-34 address this, but LU-33 could be strengthened.	Change Policy LU-33 "Encourage" to " <u>Provide for.</u> "	Agree
456	District 1 Land Use Committee	Land Use	pg. 29: LU-2, we request that this policy be changed to read "Pursue the potential for redevelopment of Opportunity Sites (generally sites larger than one acre identified as having potential for redevelopment) as higher-density mixed-use development, employment centers, and the addition of community services that are completely absent in the surrounding area, with increased full-time living wage job intensity (Figure LU-3)." Opportunity sites may be some of our best opportunities to add services to a community that are currently lacking. Since different opportunity sites have different land use categories, the exact ratio of these three outcomes will be very different from site to site.	Y	OK	Change Policy LU-2 to: <u>Pursue redevelopment of Opportunity Sites (generally sites larger than one acre identified as having potential for redevelopment) as higher-density mixed-use development or employment centers with increased full-time living wage job intensity, and the appropriate location for community services that are completely absent in the surrounding area (Figure LU-3).</u>	Agree
459	District 1 Land Use Committee	Land Use	pg. 31: LU-13, add "and strengthening parking maximums citywide."	Y	Not sure what is meant by "strengthening" parking maximums.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>	Agree
461	District 1 Land Use Committee	Land Use	pg. 33: Add White Bear-Minnehaha and Suburban Commercial District to the Neighborhood Nodes list. See note for pg. 43.	Y	OK	Add White Bear-Minnehaha and Suburban Commercial District to the Neighborhood Nodes list and map.	Agree

462	District 1 Land Use Committee	Land Use	pg. 35: Change LU-39 to “Continue to require large lots for residential parcels with private utilities and/or steep slopes by use of a zoning overlay district rather than underlying zoning to preserve the natural ecosystem along the river bluffs.” Residents who choose to continue using private utilities need larger lots for health and environmental reasons, but residents who choose to connect to public utilities should not be obligated to retain the large lots necessary for private utilities.	Y	Agree with sentiment, but not requiring an overlay. Generally, overlays are cumbersome to administer and confusing to the public.	Edit Policy LU-39: "Maintain" to "Provide for."	Agree
463	District 1 Land Use Committee	Land Use	Change LU-40 to “Promote cluster development with public utilities on the flat portion of sites with steep slopes and heavy tree canopy to add density in a way that preserves the natural ecosystem along the river bluffs.”	Y	OK, but MRCCA regulations will govern what type of and how development occurs on sites with steep slopes.	Edit Policy LU-40: <u>Promote</u> cluster development with public utilities <u>to add density in a way</u> that preserves the natural ecosystem along the river bluffs.	Agree
464	District 1 Land Use Committee	Land Use	Add a new Semi-Rural policy that reads “promote the concentration of infill development and redevelopment on flatter parcels, especially those on arterial and/or collector streets, at densities similar to Urban Neighborhoods while being sensitive to the context of the surrounding area and preserving the natural feeling of the area.”	Y	OK	Add new Semi-Rural Policy LU-XX. <u>Promote context-sensitive infill development along arterial and collector streets, at densities similar to Urban Neighborhoods, while preserving the natural features of the area.</u>	Agree
465	District 1 Land Use Committee	Land Use	Add a new Semi-Rural policy that reads “continue to expand the availability of public utilities, where feasible, to provide the opportunity for voluntary utility connection to abutting properties.”	Y	OK	Add new Semi-Rural Policy LU-XX. <u>Expand the availability of public utilities, where feasible, to provide for voluntary connections to abutting properties.</u>	Agree
468	District 1 Land Use Committee	Land Use	pg. 40: Add language to the Downtown description to acknowledge downtown’s role as a regional transportation hub.	Y	OK	P. 40 Change to: Downtown is the <u>highest-density mixed-use core</u> of Saint Paul and <u>a regional transportation hub</u> , encompassing all the B4 and B5 Zoning Districts and most of Planning District 17.	P. 40 Change to: Downtown is the <u>highest-density mixed-use core area</u> of Saint Paul and <u>a regional transportation hub</u> , encompassing all the B4 and B5 Zoning Districts and most of Planning District 17.
469	District 1 Land Use Committee	Land Use	Add a sentence to the end of the Semi-Rural description to read “infill development and redevelopment will be concentrated on arterial and/or collector streets and on flatter sites.”	Y	OK -same comments as #56.	Add new Semi-Rural Policy LU-XX. <u>Promote context-sensitive infill development along arterial and collector streets, at densities similar to Urban Neighborhoods, while preserving the natural features of the area.</u>	Agree

470	District 1 Land Use Committee	Land Use	pg. 43: We agree with the placement of all Neighborhood Nodes already identified in District 1. We request additional Neighborhood Nodes be designated at/around White Bear Ave & Minnehaha Ave and along Suburban Ave between White Bear Ave and Ruth St. The first addition provides a node in an area with residences over a mile from any other node and at the intersection of a state highway and county highway, and the second acknowledges a need for a neighborhood node south of a significant community barrier (I-94) and near existing multifamily housing.	y	OK	Add NN at White Bear-Minnehaha and White Bear-Suburban.	Agree
472	District 1 Land Use Committee	Land Use	We request you color green the Fish Creek Open Space. This is a significant County-owned park space that is part of a larger park complex stretching into Maplewood.	Y	OK	Add "Fish Creek Bluff Preserve" parcel to park use in Future Land Use Map.	Agree
473	District 1 Land Use Committee	Land Use	We request you designate the parcels along McKnight Rd, Carver Ave, Point Douglas Rd, and the east-west portion of Highwood Ave in South Highwood as Urban Neighborhood to correspond with the proposed Semi-Rural policy changes.	Y	New policy recommended in #62 will generally allow for increased densities, so no need to change map. Change designation of intersection of Carver/.Pt. Douglas to allow for limited commercial uses.	Add three parcels at intersection of Carver/Pt. Douglas to Urban Neighborhood.	Agree
477	District 1 Land Use Committee	Land Use	pg. 51: In Figure LU-4, we request that the residential density range for Semi-Rural be changed to 2-15 units/acre. This reflects both the RL lot size of a half-acre (2 units/ac) and acknowledges the density likely to be seen in a cluster development. It also provides overlap with Urban Neighborhood to provide flexibility in the future and transition between the two designations.	Y	OK	Change base range in Figure LU-4 to 2-15 Units/Acre in Semi-Rural cell	Agree
478	Union Park District Council	Land Use	"At its January 2nd, 2019 meeting the full Union Park District Council voted to support the assertion by the Lexington-Hamline Community Council that the treatment of the intersection at Selby and Dunlap as a Neighborhood Node in the City's draft 2040 Comprehensive Plan is inconsistent with the Union Park District Council's Community Plan. The Union Park Community Plan states, " <i>Smaller scale residential and smaller scale commercial uses are the most appropriate for the predominantly residential mixed-use corridor of Selby Avenue between Lexington Parkway and Ayd Mill Road. If new development should occur in this segment, it would preferably occur at existing commercially-zoned nodes.</i> " (LU1.4) The Union Park District Council feels that the Neighborhood Node designation is not in alignment with the above provision as it applies to the intersection of Selby and Dunlap and should be removed from the City's draft 2040 Comprehensive Plan.	Y	OK	Move NN from Selby-Dunlap to Selby-Milton	Agree

479	James Slegers	Land Use	<p>As you consider the long term plan for the city of St Paul, I ask you to commit to inclusive zoning policies that enable long term population growth and broader housing choice while eliminating policies that hinder the pursuit of carbon footprint reduction. The vast majority of the city of St Paul is zoned single family at present. This de facto limits housing density and housing choice in 90% of the city. Given the already slim unit availability in the city and the long term expectation of population growth, we should be upzoning all parts of St Paul, to accommodate diverse types of new construction and renovation wherever it is needed. Broad upzoning not only enables population growth, but also decreases housing costs in the long term. Broad upzoning supports the policy goal of equity and equal accessibility by increasing the housing options of those who wish to live in those communities.</p>	Y	<p>The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.</p>	<p>Change Policy LU-33 "Encourage" to "Provide for."</p>	Agree
480	James Slegers	Land Use	<p>We should eliminate parking minimums and either eliminate permit-only parking or increase the cost to market rate. Parking minimums encourage wasteful land use and limit density. Undercharging for permit parking subsidizes individual vehicle use, and both these policies reduce the available tax base. Further, parking minimums and subsidization of parking contribute to sprawl and make neighborhoods less accessible to those who are unable to afford a vehicle. We should encourage density and reduce reliance on cars, both to reduce regional carbon footprint and to make our city more accessible and usable to people of all means. Greater density increases the efficiency and effectiveness of mass transit, as well as making walking and biking more viable alternatives.</p>	y	<p>It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.</p>	<p>Edit Policy LU-13: Change "minimums" to "<u>overall</u>." Add City-wide Policy LU-XX. <u>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.</u></p>	Agree

481	James Slegers	Land Use	LU-7 should be defined more precisely. We should follow the lead of Minneapolis in explicitly allowing multi-family housing in all residential areas and eliminating parking minimums. Similarly, LU-33 should not just encourage but "Allow by right"	Y	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	Change Policy LU-33 from "Encourage" to "Provide for."	Agree
483	James Slegers	Land Use	Add more Neighborhood Node locations in the Highland/MacGroveland/Summit Hill neighborhoods.	Y	Nodes were generally already placed at appropriate locations within these neighborhoods, with the exception of a couple nodes along the A Line.	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Snelling-St. Clair and Snelling-Minnehaha.	Agree
484	James Slegers	Land Use	All of West 7th and the Riverview corridor, and along the A BRT line should be Neighborhood Nodes, as was done along the Green Line. Neighborhood Nodes should be expanded wherever BRT lines are developed.	Y	Nodes were generally already placed at appropriate locations along these transit corridors, with the exception of a couple nodes along the A Line.	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Snelling-St. Clair and Snelling-Minnehaha.	Agree

485	Frank Alarcon	Land Use	<p>As a resident of Saint Paul, I would like the comprehensive plan to abolish single-family zoning and minimum parking requirements, like the Minneapolis 2040 plan. These policies restrict the supply of housing and raise the cost of development, contributing to the region's housing crisis that disproportionately harms people of color and people with low incomes. They also exacerbate climate change by guaranteeing space for cars and reserving swaths of the city for single-family homes only. Thank you.</p>	Y	<p>It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study. The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.</p>	<p>Edit Policy LU-13: Change "minimums" to "<u>overall.</u>" Add City-wide Policy LU-XX. <u>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.</u></p>		Agree
488	Eric Osekowsky	Land Use	<p>In particular I'm thinking of my neighborhood, Midway, where I live a couple blocks off Snelling. Being right off both the A line and the green line, a short drive from 94 and right between both downtowns I often think about how the composition (and zoning) of this stretch of Snelling as it stands now is a poor use of an area with a very valuable location and fantastic transit options. Given the amount of investment which has gone into the Green and A lines, and the potential unlocked with the redevelopment of the Midway shopping center I hope St. Paul looks beyond the immediate Snelling & University Node area when executing this plan. And I really hope we see a zoning study for the north end of Snelling Ave.</p>	Y	OK	<p>Add implementation item to conduct zoning studies as major transit improvements are made.</p>		Agree

489	Nancy O'Brien Wagner	Land Use	Where decreasing parking requirements?	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>	Agree
490	Elisabeth Wurtmann	Land Use	Further, I urge the city to pass a plan written to allow significant increases in density in the Neighborhood Nodes, with an increased number of nodes.	Y	OK	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Selby-Milton; Snelling-St. Clair; Snelling-Minnehaha; E 7th-Payne; Arcade-Case; Arcade-Maryland; White Bear-Minnehaha; White Bear-Suburban; Cook-Phalen	Agree
491	Elisabeth Wurtmann	Land Use	Additionally, I support the elimination of parking requirements to allow increased density and a greater emphasis on our city's strong public transit options.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>	Agree
496	Rick Varco	Land Use	In LU-13, change "reduce parking minimums" to "eliminate". Parking minimums add to housing costs and force all of us to subsidize car owners. Those who want and need parking should pay for it and those without cars or satisfied with on-street parking shouldn't have to pay.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>	Agree
498	Rick Varco	Land Use	Delete LU-28. There is no need to ensure 'gradual transitions'. Transitions in building height whether gradual or radical harm no one and can only be used to block needed density.	Y	OK	Delete "gradually"	Agree
500	Rick Varco	Land Use	The draft should add more node locations in the Highland/MacGroveland/Summit Hill areas.	Y	Nodes were generally already placed at appropriate locations within these neighborhoods, with the exception of a couple nodes along the A Line.	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Snelling-St. Clair and Snelling-Minnehaha.	Agree

501	Rick Varco	Land Use	Just as the draft places nodes all along University Ave and the Light Rail line, it should do the same for all of West 7th and the Riverview Corridor and for the route of the A Line BRT. If we prevent people from living along these expensive public investments, we diminish their utility and waste tax payer dollars. Furthermore, the plan should stipulate that the routes of any future BRT will be automatically upgraded to Neighborhood Node status.	Y	Neighborhood Nodes are proposed for all Gold Line, Rush Line, and Riverview Corridor stops. Not all A Line stops are proposed for Neighborhood Nodes because there are not station area plans completed or proposed for the A Line.	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Snelling-St. Clair and Snelling-Minnehaha.		Agree
502	Rick Varco	Land Use	LU-33 Strengthen "encourage" to "allow by right". There is no reason for the city to block this development.	Y	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	Change Policy LU-33 "Encourage" to "Provide for."		Agree

509	Luke Hanson	Land Use	We should follow the Minneapolis 2040 plan and relax government restrictions on multi-family housing throughout the city and eliminate parking requirements.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study. The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>	Agree
510	Luke Hanson	Land Use	LU-13 should "eliminate" parking minimums rather than "reduce" them. Parking minimums inherently favor automobiles as a mode of transportation, burdening business owners and housing developers with additional costs that are passed to consumers and residents, and undermining the possibility of St. Paul being a transit-friendly, walkable community.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>	Agree
511	Luke Hanson	Land Use	LU-28 should be deleted. Transitions in building height harm no one, whether they are gradual or sudden. This policy would only be used to block development which is deemed too dense.	Y	OK	Delete "gradually"	Agree

512	Luke Hanson	Land Use	LU-33 should not just "encourage" medium-density housing, but "allow by right."	Y	A policy in the Comprehensive Plan cannot allow anything by right. The City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	Change Policy LU-33 "Encourage" to "Provide for."	Agree
515	Luke Hanson	Land Use	Stations along current and planned transit lines (the Riverview Corridor, the A Line BRT, and future BRT Lines) should automatically be upgraded to Neighborhood Nodes.	Y	This has been done with the exception of the A Lane, which does not have station area plans.	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Selby/Milton; Snelling/St. Clair; Snelling/Minnehaha; E 7th/Payne; Arcade/Case; Arcade/Maryland; White Bear/Minnehaha; White Bear/Suburban; Cook/Phalen	Agree
516	Luke Hanson	Land Use	More Neighborhood Nodes should be added throughout the city, particularly in Highland, Macalaster-Groveland, and Summit Hill, where they are conspicuously few in the current draft. Examples: Grand-Cleveland, Grand-Snelling, Grand-Hamline, Grand-Lexington, St. Clair-Fairview, St. Clair-Snelling, St. Clair-Hamline, St. Clair-Lexington, Randolph-Cleveland, Randolph-Fairview, Randolph-Hamline, Randolph-Lex, Snelling-Ford, Hamline-Ford, Marshall-Fairview, Marshall-Snelling, Selby-Fairview, Selby-Victoria, Hamline-Thomas, Fairview-Minnehaha, Maryland-Rice, Arlington-Rice.	Y	OK	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Selby-Milton; Snelling-St. Clair; Snelling-Minnehaha; E 7th-Payne; Arcade-Case; Arcade-Maryland; White Bear-Minnehaha; White Bear-Suburban; Cook-Phalen	Agree
517	Eric Saathoff	Land Use	I hope the city takes this opportunity to eliminate parking minimums citywide. There is no reason that the city should be enforcing a car-centric transportation system. Residents and business owners should decide what amount of parking they need and supply it themselves. This is an easy way to make housing more affordable and make it easier to do business in our city.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>	Agree

518	Eric Saathoff	Land Use	<p>I also hope the city will take this opportunity to follow the footsteps of Minneapolis in upzoning either the entire city or vast portions of it. There is no way to reduce the cost of housing by restricting the supply. The city of St. Paul has an enormous amount of single family zoned neighborhoods. We need to upzone to allow more supply of housing. If this is to be done in nodes, there should be more nodes that follow transit corridors (bus lines) and existing commercial corridors.</p>	Y	<p>The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.</p>	<p>Change Policy LU-33 "Encourage" to "Provide for."</p>	<p>Agree</p>
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519	Al Davison	Land Use	<p>Regarding land use, more mixed-use and medium-density development can help strengthen our neighborhoods and it will help with the current housing shortage. Higher-density development can help further strengthen our downtown, and other places such as around Snelling and University. Saint Paul has the ability to support more residents and through reforming zoning regulations, the city could allow better opportunities for more housing choices across the city. The city can support more multi-family housing without affecting the city's large stock of single-family homes. Sites such as the Ford Site can help preserve the existing housing stock within Highland Park, while still adding more housing units of various types (from single-family to multi-unit apartments/condos). It is good that the city acknowledges the importance of infill development in the 2040 plan, but having a strong emphasis on strict height limits and other regulations has affected development from occurring in the city in the past; zoning reform of a large scale must be done in order to truly invest in future developments across the city, regardless if it is located in a designated "neighborhood node" or not.</p>	Y	<p>The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.</p>	<p>Change Policy LU-33 "Encourage" to "Provide for."</p>	Agree
521	Al Davison	Land Use	<p>Regarding transportation, removing (or at least reducing) parking minimums (ex: LU-13) can help base an area's actual parking demand off the true market demand rather than inducing parking demand off arbitrary metrics set forth by local government. Minimum parking regulations have caused the unnecessary destruction of buildings for surface parking. Surface parking lots have hurt the city's commercial corridors along Payne, Rice, and University since the mid-20th century. We have limited space in the city, and we have to acknowledge that large surface parking lots tend to negatively impact urban neighborhoods. In areas with high parking demand, paid parking meters and ramps should be considered since parking is an expensive asset to build and maintain. Designated [handicap] parking for disabled people can remain a priority for where it is needed. While parking in the city can be difficult in some places, there is a limit on the economic feasibility to build/maintain parking by both businesses and the city. We have to be more proactive in parking management, and the city's goals towards promoting shared parking is a good step forward.</p>	Y	<p>It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.</p>	<p>Edit Policy LU-13: Change "minimums" to "overall." Add City-wide Policy LU-XX. <u>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.</u></p>	Agree

523	Zack Mensinger	Land Use	While the goals of LU-13 are laudable as is, language in LU-13 should be changed to ELIMINATE, not just reduce parking minimums. And instead of just "supporting" these strategies, they should just be more firmly and completely adopted. If we are to truly reduce auto-dependency and fight climate change, we have to reduce the availability of excess parking in St. Paul. While some might argue that eliminating parking minimums would hurt businesses, I have almost never encountered an area without an excess of parking in St. Paul, plus, parking costs are quite high so requiring them puts small businesses at a disadvantage relative to larger businesses and chains that can more easily afford the costs of parking. Businesses can still provide parking if they see fit, but we should not require an excess of an expensive and environmentally damaging parking spaces. In doing so, we also help encourage people to travel by means other than personal cars, which will make these methods safer and more accessible for everyone.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>	Agree
524	Zack Mensinger	Land Use	I love the idea of Neighborhood nodes, but some of them seem misplaced or missing in general. For instance, there is a Node at Kellogg/3rd and Maria. But there is almost nothing at this intersection other than one small market. In contrast, there are many missing Nodes, such as Randolph and Lexington, Snelling and Minnehaha, etc. These intersections have many more resources and attractions, not to mention are better served by transit and therefore should be added as additional Neighborhood Nodes. Generally, any areas that are located along high frequency, high capacity transit (such as the Green and A Lines) should be classified as Neighborhood Nodes. Density allowances at Neighborhood Nodes should also be clarified.	Y	3rd/Maria is a Gold Line BRT stop. Snelling-Minnehaha is considered part of Snelling-University. Density ranges of Neighborhood Nodes are defined in Figure LU-4.	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Selby-Milton; Snelling-St. Clair; Snelling-Minnehaha; E 7th-Payne; Arcade-Case; Arcade-Maryland; White Bear-Minnehaha; White Bear-Suburban; Cook-Phalen	Agree
525	Center for Economic Inclusion	Land Use	Re: Goal - One of the places the draft comprehensive plan could include such a goal [for creating a more racially equitable economy] is among the other goals in the Land Use chapter on page 28. Additionally, the policies in that chapter that support the economic inclusion goal could be organized under it (as is done in other chapters).	Y	A goal for a racially- equitable economy is better suited to an economic development strategy.	Add a short-term item to Implementation: <u>Prepare a comprehensive, city-wide economic development strategy, with a focus on racial equity. It should include local-scaled topics, such as Neighborhood Nodes, as well as regional issues, such as transit and workforce development.</u>	Agree

528	Center for Economic Inclusion	Land Use	Re: data - In addition to disaggregating the data in the plan, the Center encourages the City to further ground the plan's policies in data. For example, policy LU-4 seeks to minimize displacement in redevelopment areas with high-frequency transit. What specific areas are these, and how do we know? What measures are used to identify displacement risk, and what does the data tell us about those areas?	Y	High-frequency transit is identified in Figure T-7. Measures to identify displacement risk and other relevant factors will be identified as part of plan implementation.	Reference Map T-7 in LU-4.	Agree with referencing Map T-7 in LU-4. Also, add a Short-Term item to the Land Use Chapter Implementation chart: <u>Identify and implement ways in which the City can minimize displacement in neighborhoods where the proximity to high-frequency transit has increased redevelopment pressure and/or housing costs.</u>
529	Center for Economic Inclusion	Land Use	For example, Policy LU-6 states "Foster equitable and sustainable economic growth by [actions 1-10]. How will these actions foster and sustain equitable economic growth? How will the City apply an equity lens to this policy? Which of the seven goals in the land use chapter does this policy support? Which of these actions will be focused on communities of color? Which ones will be applied evenly, city-wide? The Center encourages the City to expand upon this policy with a more detailed discussion of how it will advance equity and economic inclusion.	Y	This policy lays the basic principles for the City's economic development goals. We agree that this needs additional detail, including how it will be implemented. The best form for this would be a city-wide economic development plan or strategy.	Add a short-term item to Implementation: <u>Prepare a comprehensive, city-wide economic development strategy, with a focus on racial equity. It should include local-scaled topics, such as Neighborhood Nodes, as well as regional issues, such as transit and workforce development.</u>	Agree
531	Center for Economic Inclusion	Land Use	The Center also encourages the City to provide more detail in the implementation section of the plan, especially regarding the policies that seek to advance economic inclusion. The introduction to the implementation chapter includes the following among ten "general implementation" actions: "implement and regularly update the City's Racial Equity Plan to realize and measure equity-related goals and policies." Also, the land use chapter implementation table includes "Implement Economic Development Strategy." How do the racial equity plan and economic development strategy work together to implement comprehensive plan policies? Where do their goals, strategies and measures overlap and diverge? Given the reality of limited resources, what among these plans and strategies will be prioritized in the near term?	Y	Agree with the need for a comprehensive Economic Development Strategy and for it to be informed by the Racial Equity Plan.	Add a short-term item to Implementation: <u>Prepare a comprehensive, city-wide economic development strategy, with a focus on racial equity. It should include local-scaled topics, such as Neighborhood Nodes, as well as regional issues, such as transit and workforce development.</u>	Agree
537	Tom Dimond	Land Use	LU-20 - add - "and habitat" after natural resources (page 32)	Y	OK	Policy LU-20 Add "and habitat" as noted	Agree
538	Tom Dimond	Land Use	LU-36 - remove - "while minimizing the reduction of tax base" This is not needed and parks enhance the tax base by enhancing the value of surrounding properties (page 35)	Y	OK	Policy LU-36, change " while minimizing reduction of tax base " to " <u>and leverage other public investment.</u> "	Agree

540	Tom Dimond	Land Use	Industrial - substitute - "Some industrial" - add - "The City supports the conversion of industrial property use to provide the greatest number of jobs and tax revenue and will work to eliminate tax exemptions." If the City is interested in increasing the tax base and number of jobs the City must focus on industrial that has a higher number of jobs per acre and higher property taxes per acre to maximize jobs and tax revenue. Some industrial is not much more than storage lots that provide few jobs and limited taxes. Some industrial pays limited taxes because of tax exemptions. The City must eliminate industrial tax exemption to maximize tax revenue. (page 35)	Y	OK	Change LU-42 to " <u>support and encourage development that maximizes tax base, job creation and/or job retention.</u> "	Agree
545	Tom Dimond	Land Use	LU-55 - add - "and natural resource protection and enhancement" after urban development (page 53)	Y	OK	add " <u>and environmental protection.</u> "	Agree
549	Saint Anthony Park Community Council (SAP)	Land Use	(note the misspelling of "vehicle" in LU-13)	Y	OK	Correct	Agree
550	Saint Anthony Park Community Council (SAP)	Land Use	Perhaps the greatest shortcoming of the current draft relates to reuse and redevelopment of the industrial areas in Saint Anthony Park and the Creative Enterprise Zone. The area is dotted with vacant land and former industrial buildings. There is pressure to redevelop the area parcel by parcel with uses such as one-story warehouses and public storage buildings that bring truck traffic to the area but do little to create on-site higher wage job opportunities for our working force. These types of uses should be prohibited. Our future as a diverse and equitable city must include job density as well as affordable housing. A new policy element should be inserted, perhaps after Policy LU-41 stating that, where industrial land is near transit, high job density should be required when property is developed/redeveloped.	Y	OK	Change LU-42 to " <u>support and encourage development that maximizes tax base, job creation and/or job retention.</u> "	Agree
552	Saint Anthony Park Community Council (SAP)	Land Use	Redevelopment of the industrial area for 21st Century business must include action steps similar to those set out in Policy 98: "Innovation Districts" of the Minneapolis Comprehensive Plan, a copy of which is attached. This would include flexible zoning, not one-size-fits-all. The proposed ten-year plan for Saint Anthony Park calls for a new zoning overlay district in the Creative Enterprise Zone that encourages a variety and density of uses. This could include live/work arrangements in appropriate circumstances. Items 17 and 18 in Figure I-1 of the Implementation Chapter in the Comprehensive Plan call for studies somewhat along these lines over a leisurely 5-10 years, but market demand is not going to wait. The time to take action on creating the overlay district is now.	Y	Comment acknowledged	Change implementation items 17-18 to short-term.	Agree

556	Saint Anthony Park Community Council (SAP)	Land Use	3. To encourage cultural and arts-based businesses and business districts (LU-6.5) requires that we maintain and develop affordable workspace for artists, where art can be produced. Where redevelopment has occurred, artists have been forced to relocate, threatening their livelihoods and dispersing functioning artist communities. Many artists prefer to live separately from their studios, due to exposure to paint fumes, solvents, welding vapors, particulates, and so on. Market forces will not achieve the goal of equitable and sustainable economic growth; rather, the City needs to develop the policies, guidelines, and ordinances that will.	Y	LU-6 lays the basic principles for the City's economic development goals. We agree that this needs additional detail, including how it will be implemented. The best form for this would be a city-wide economic development plan or strategy.	Add to the Implementation section: <u>Prepare a comprehensive, city-wide economic development strategy.</u>		Agree
558	Saint Anthony Park Community Council (SAP)	Land Use	5. Include surface parking in district parking solutions ("district ramps and lots") and eliminate (do not simply reduce) parking minimums (LU-13). If it is not possible to remove parking minimums completely, remove them from residential buildings of 4 units or fewer.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to "overall." Add City-wide Policy LU-XX. <u>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.</u>		Agree
559	Saint Anthony Park Community Council (SAP)	Land Use	6. Policy LU-16 incorrectly refers to Figure LU-6, but should refer to Map LU-6. This policy recognizes the conflicting rights of property owners – one having the right to access to sunlight; the other the right to build to a height allowed by zoning or variance. In the cases where this occurs, the City could require that new development or redevelopment produce (not simply purchase) the equivalent amount of solar energy to the credit of the affected property owner.	Y	Comment acknowledged.	Change to "Map LU-6"		Agree
560	Saint Anthony Park Community Council (SAP)	Land Use	7. In the Neighborhood Node section, we recommend "Neighborhood Nodes will be denser..." replace "The intent is for Neighborhood Nodes to be denser..."	Y	Agree	Change to read: " <u>Neighborhood Nodes are denser concentrations...</u> "	33	Agree
561	Saint Anthony Park Community Council (SAP)	Land Use	8. We support placement of a "freeway lid" over Highway 280 between Franklin Avenue and Territorial Road as outlined in Policy LU-53 and T-39. This location is prime for commercial development complementing Court International, the adaptive reuse of the Case building, and the Westgate Office Park. This should be included as a Medium-Term priority in Figure I-1 of the Implementation Chapter. We also suggest a map be added to the Plan that indicates potential locations of these highway lids, including over 280 from Franklin to Territorial.	Y	OK	Add an implementation item for freeway lids		Add a Medium-Term item in the Land Use Chapter Implementation chart to read: <u>Study the feasibility, appropriate location and design of land bridges.</u>
562	Saint Anthony Park Community Council (SAP)	Land Use	10. Major redevelopment projects are in the works for the Luther Seminary land and Commonwealth Terrace land in and abutting North Saint Anthony Park that are not compatible with the uses shown on Map LU-2. For the initial concepts of the University of Minnesota, see page 24 of this file.	Y	OK	Review and adjust Map LU-2, as appropriate.		Agree

563	Saint Anthony Park Community Council (SAP)	Land Use	11. The view of the Minneapolis skyline from high points in north Saint Anthony Park, such as along Bourne Ave, Hoyt Ave, and Fulham St, and from the Luther Seminary campus, is a significant public view that should be preserved and enhanced. Development on what is presently the northern half of Luther Seminary campus should be designed so that streets and other public spaces in the development take advantage of the view. The view should be an amenity to everyone, not just the private homeowners and renters in any redevelopment of the campus. The map should guide the future, not look to the past.	Y	Agree	Review and add views, as appropriate	Agree
565	Saint Anthony Park Community Council (SAP)	Land Use	13. Mixed-Use should be added to the Neighborhood Node at Snelling and Como on the A Line transit route. Additional Neighborhood Nodes should be added at all major cross-street intersections with light rail and current and future Arterial Bus Rapid Transit and streetcar routes. To make the city truly walkable and to build a sense of identity in all areas, everyone should be within a half mile of a Neighborhood Node. This could transform Saint Paul into a city of true neighborhoods.	Y	Nodes are located at all transit stops with the exception of the A Line, for which there are no station area plans.	Add Mixed Use to Como-Snelling Neighborhood Node on Map LU-2.	Agree
566	Saint Anthony Park Community Council (SAP)	Land Use	14. Medium density housing should be allowed by right (as per Policy H-48), rather than simply "encouraged" in Urban Neighborhoods (Policy LU-33).	Y	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	Change Policy LU-33 "Encourage" to "Provide for."	Agree

569	Dan Marshall and Millie Adelsheim	Land Use	We strongly believe that the comprehensive plan should promote and allow density throughout the city, not just along transit corridors. We should follow Minneapolis' lead and abolish exclusionary zoning that allows only single family homes. By design, single family zoning promotes car use, reduces walkability, and tends to exclude low-income residents, stratifying our city by income.	Y	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	In Policy LU-33, change "Encourage" to "Provide for."	Agree
571	Dan Marshall and Millie Adelsheim	Land Use	The following policies should be included in the Comprehensive Plan: • Parking minimums should be eliminated throughout the city.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to "overall." Add City-wide Policy LU-XX. <u>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.</u>	Agree

573	Karen Allen	Land Use	Saint Paul is experiencing a housing shortage and dramatic increases in housing costs, making it challenging for current and future residents to have stable, long-term housing plans within our city. I hope that we can increase the abundance of housing and eliminate exclusionary zoning so that we can have more residents of diverse circumstances (age, race, employment, family status, education, etc.) all contributing to a strong economic future for Saint Paul.	Y	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	Change Policy LU-33 "Encourage" to "Provide for."	Agree
579	Karen Allen	Land Use	<ul style="list-style-type: none"> • LU-13 Change "reduce parking minimums" to "eliminate". Especially pertinent for small multi-family residences (duplex up to 'missing middle' style buildings) 	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to "overall." Add City-wide Policy LU-XX. <u>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.</u>	Agree
581	Karen Allen	Land Use	Neighborhood Nodes Policy - p.33, Land Use Appendix A, Map LU-2 - p.42 • Add more locations in Highland/Mac/Summit Hill.	Y	OK	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Snelling-St. Clair and Snelling-Minnehaha.	Agree
582	Karen Allen	Land Use	Neighborhood Nodes Policy - p.33, Land Use Appendix A, Map LU-2 - p.43 • Similar to University, all of West 7th/Riverview corridor should be NNs. Same for the A Line Bus BRT. Anything along a train or BRT Route should automatically be NN.	Y	Nodes were generally already placed at appropriate locations along these transit corridors, with the exception of a couple nodes along the A Line.	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Snelling-St. Clair and Snelling-Minnehaha.	Agree

583	Karen Allen	Land Use	<ul style="list-style-type: none"> • LU-33 Strengthen “encourage” to “allow by right”. There is no reason for the city to block this development. 	Y	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	Change Policy LU-33 "Encourage" to "Provide for."	Agree
608	Jessa Anderson-Reitz	Land Use	LU-13 should “eliminate” parking minimums rather than “reduce” them. Parking minimums inherently favor automobiles as a mode of transportation, burdening business owners and housing developers with additional costs that are passed to consumers and residents, and undermining the possibility of St. Paul being a transit-friendly, walk-able community.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to "overall." Add City-wide Policy LU-XX. <u>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.</u>	Agree
609	Jessa Anderson-Reitz	Land Use	LU-28 should be deleted. Transitions in building height harm no one, whether they are gradual or sudden. This policy would only be used to block development which is deemed too dense.	Y	Noted	Delete "gradually"	Agree

610	Jessa Anderson-Reitz	Land Use	LU-33 should not just “encourage” medium-density housing, but “allow by right.”	Y	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city’s Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	Change Policy LU-33 "Encourage" to "Provide for."	Agree
613	Jessa Anderson-Reitz	Land Use	Stations along current and planned transit lines (the Riverview Corridor, the A Line BRT, and future BRT Lines) should automatically be upgraded to Neighborhood Nodes.	Y	Nodes are located at all transit stops other than A Line, due to there being no station area plans along the A Line.	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Snelling-St. Clair and Snelling-Minnehaha.	Agree
614	Jessa Anderson-Reitz	Land Use	More Neighborhood Nodes should be added throughout the city, particularly in Highland, Macalaster-Groveland, and Summit Hill, where they are conspicuously few in the current draft. Examples: Grand- Cleveland, Grand-Snelling, Grand-Hamline, Grand-Lexington, St. Clair- Fairview, St. Clair-Snelling, St. Clair-Hamline, St. Clair-Lexington, Randolph-Cleveland, Randolph-Fairview, Randolph-Hamline, Randolph-Lex, Snelling-Ford, Hamline-Ford, Marshall-Fairview, Marshall-Snelling, Selby-Fairview, Selby-Victoria, Hamline-Thomas, Fairview-Minnehaha, Maryland-Rice, Arlington-Rice.	Y	OK	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Selby-Milton; Snelling-St. Clair; Snelling-Minnehaha; E 7th-Payne; Arcade-Case; Arcade-Maryland; White Bear-Minnehaha; White Bear-Suburban; Cook-Phalen.	Agree

618	Kody Sherlund	Land Use	<p>This leads me to my second point: 2) Affordability must come with increasing demand to live in the city. Simply put, supply must keep up with demand, particularly with housing. The single most effective way the city can influence increasing the supply of housing is to change zoning laws (allow for duplexes, triplexes, townhomes, and the "missing middle" in general) and to promote infill without minimum parking requirements.</p>	Y	<p>The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.</p>	<p>Change Policy LU-33 "Encourage" to "Provide for."</p>	Agree
619	Kody Sherlund	Land Use	<p>If mandatory parking spaces must come with development, incentivizing driving cars will continue, and valuable urban space is wasted on storing cars.</p>	y	<p>PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.</p>	<p>Edit Policy LU-13: Change "minimums" to "<u>overall.</u>" Add City-wide Policy LU-XX. <u>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.</u></p>	Agree

622	Scott Berger	Land Use	I would like to see a plan at least as ambitious as Minneapolis's, where landowners have greater freedom to build multi-unit dwellings in traditionally single-family districts, and where increased housing--both affordable and market rate--permeates the city, leading to more neighbors and more diverse neighbors.	Y	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.	Change Policy LU-33 "Encourage" to "Provide for."	Agree
625	Jeff Zaayer	Land Use	Policies LU-13 and LU-14 aim to increase using space allocated to parking more efficiently. In addition to approaches such as shared use parking, eliminating parking minimums would be effective in allowing the market to provide an appropriate amount of parking, thus relieving the financial and environmental strains associated with building parking in excess because of minimum requirements.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to "overall." Add City-wide Policy LU-XX. <u>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.</u>	Agree

627	Jeff Zaayer	Land Use	Policy LU-34 calls for "providing for multi family housing along arterial and collector streets to facilitate walking and leverage the use of public transportation" Given the public health impacts of exposure to particulate pollution caused by vehicles, as well as the effects of long term exposure to noise that interrupts sleep, I believe that multi family housing should not be exclusively promoted along busy corridors such as Marshall and Snelling Avenues. Because people of color and low income people as well as other underrepresented groups live in multi family housing at far higher rates than white and higher income people. Focusing multi family housing development near noisy, polluted roads while preserving quiet neighborhoods with clean air for those who can afford single family homes is a massive equity issue. I would like to see the comp plan provided for not only along arterial and collector streets but across the city. In addition to equity benefits, this would allow for the density needed to support walkability and high quality public transportation.	Y	Increasing housing along transit routes is the most efficient way to use land, and it allows the city to grow without overloading streets with automobiles. Additionally, it allows people to reduce their overall cost of living (since they do not need to own a car), which increases affordability. Some studies have shown increased health impacts along highways and 4-lane roads. However, this policy is not implemented in isolation. There are other trends and policies that influence health, such as cleaner and quieter vehicles, improving walkability.	Change Policy LU-34 to "Provide for multi-family housing along arterial and collector streets, <u>and in employment centers</u> to facilitate walking, access to jobs and the use of public transportation."	Agree
630	Cory Zwiefelhofer	Land Use	2. Eliminating parking minimums altogether needs to become public policy;	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to "overall." Add City-wide Policy LU-XX. <u>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.</u>	Agree
634	Jake Reuter	Land Use	Parking minimums should be eliminated from Saint Paul's zoning code. Establishing artificial floors on the number of parking spaces that a development must provide increases the cost of development and ultimately rent or businesses and residents, regardless of whether or not they need the parking.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>	Agree
635	Jake Reuter	Land Use	More "nodes" should be added to the map, especially where two transit lines meet or there is existing streetcar-style commercial development. These nodes are what make Saint Paul an exciting and walkable place to live!	Y	OK	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Selby-Milton; Snelling-St. Clair; Snelling-Minnehaha; E 7th-Payne; Arcade-Case; Arcade-Maryland; White Bear-Minnehaha; White Bear-Suburban; Cook-Phalen	Agree

636	Jake Reuter	Land Use	Saint Paul should follow the lead of Minneapolis and eliminate single-family exclusive zoning. Triplexes should be allowable anywhere in our city.	Y	<p>The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter.</p>	<p>Change Policy LU-34 to "Provide for multi-family housing along arterial and collector streets <u>and in employment centers</u> to facilitate walking, access to jobs and the use of public transportation."</p>	Agree
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637	Philip Bussey	Land Use	I think this comprehensive plan should recognize the negative impact that exclusively zoning for single family homes has done to our city and allow for multi family dwellings throughout the entire city, increase where mixed-use buildings are allowed, and remove parking minimums.	Y	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall</u> ." Add City-wide Policy LU-XX. <u>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.</u>	Agree
639	Brendan O'Shea	Land Use	The size and number of neighborhood nodes should be expanded to allow for greater mixed-use density in commercial corridors. Increased density up to a half mile from the center of the node would be preferable.	Y	The node symbol does not indicate the literal size of the NN. The size will be dictated by adopted plans, context and market.	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Selby-Milton; Snelling-St. Clair; Snelling-Minnehaha; E 7th-Payne; Arcade-Case; Arcade-Maryland; White Bear-Minnehaha; White Bear-Suburban; Cook-Phalen.	Agree
640	Brendan O'Shea	Land Use	Neighborhood nodes that align with A Line stations, such as Snelling/Minnehaha, should be included.	Y	Not all A Line stations were included because of stop frequency and because there are no station area plans for the stops.	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Snelling-St. Clair and Snelling-Minnehaha.	Agree

641	Brendan O'Shea	Land Use	The land use section describes the need to balance the needs of commerce with adjacent land use: "It is important to provide for [commercial transport] uses while ensuring minimum negative external impacts to adjacent land uses." Policy LU-53 addresses the mitigation of negative effects of highways. LU-54 or a related policy should similarly address the mitigation of negative effects of freight and intermodal operations, particularly in those areas (such as near Newell Park) where the encroachment has been of freight and intermodal uses upon residential areas rather than the opposite as the text of LU-54 implies.	Y	OK	Add new Transportation policy: LU-XX. Provide for transportation uses while <u>ensuring minimum negative external impacts to adjacent land uses.</u>	Agree
642	KL	Land Use	I support the following additions to the city's plan: 1) creative policies to stop the negative impacts of gentrification on residents and small businesses such as limits on how much rent can increase to protect affordable housing and commercial spaces for businesses (such as New York City's rent control)	Y	LU-4 addresses this as a matter of policy, but more detail on how to limit displacement could be part of a city-wide Economic Development Strategy.	Include in Economic Development Strategy implementation item.	Agree
643	Kathryn Noble	Land Use	St. Paul is currently very car-centric with single use parking lots and street parking, which makes for very inefficient and costly use of valuable space.	Y	Noted	Add City-wide Policy LU-XX. <u>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.</u>	Agree
647	Michael Healy	Land Use	The plan looks great except for one major flaw. It needs to be amended to call for the elimination of minimum off-street parking requirements, at least for commercial and industrial businesses and possibly some types of residential development as well. The policy goal could be formatted as something along the lines of "The City will eliminate minimum parking requirements for commercial and industrial properties and explore the elimination or reduction of minimum parking requirements for residential properties."	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>	Agree

648	Michael Healy	Land Use	<p>The usefulness of minimum parking requirements has been thoroughly debunked and they have very little support these days from anyone who takes the issue seriously. The requirements are even starting to lose support in rural areas and amongst conservatives, despite their "pro-car" attitudes, because minimum parking requirements are anti-business and flat-out don't work well. Minimum parking requirements represent an unnecessary and heavy-handed "big government" intervention into the marketplace which attempts to solve a problem that doesn't even exist. Most businesses that need parking are going to build parking as they won't be able to get bank financing otherwise. Developers will build the type of parking that they need to build to keep their tenants happy. The free market will figure parking out and 99% of the time will do a better job than the zoning code's arbitrary parking requirements. Cities kill or hurt good projects all the time by making an arbitrary determination that "there isn't enough parking." The business then either has to try to get a variance (costly, time-consuming, and prone to sabotage by neighborhood groups and other businesses) or has to buy up neighboring properties to bulldoze them and put up more parking. More often than not, this results in an oversized parking lot that sits at least partially empty most of the time. Also, the City loses the tax base from the buildings that had to be bulldozed to create the parking.</p>	Y	<p>It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.</p>	<p>Edit Policy LU-13: Change "minimums" to "<u>overall.</u>" Add City-wide Policy LU-XX. 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.</p>	Agree
651	Michael Healy	Land Use	<p>It would be a huge missed opportunity if we failed to include this goal in our 2040 plan. Honestly, I don't think its possible to achieve any of the other goals regarding walkability, housing affordability, increased transit usage, etc. if this issue isn't addressed. By 2040, most cities aren't going to have minimum parking requirements, everything is moving in that direction. Saint Paul has an opportunity to be a leader in this. Please, let's get some language in our comprehensive plan!</p>	Y	<p>It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.</p>	<p>Edit Policy LU-13: Change "minimums" to "<u>overall.</u>" Add City-wide Policy LU-XX. <u>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.</u></p>	Agree
658	Michael Kuchta	Land Use	<p>I want to bring to your attention a couple of omissions: Page 33: A reminder that both the District 6 and District 10 boards have requested that the Como/Front/Dale area be designated an "opportunity site," not merely a "neighborhood node."</p>	Y	OK	<p>Add Opportunity Site at Como/Front/Dale</p>	Agree
659	Jake Reilly	Land Use	<p>Map LU-5 community designation must be revised to show the city in context with surrounding communities and the plan must state somewhere (anywhere. On the map. In the text. Somewhere.) that the minimum residential density for an Urban Center is 20 units per acre, in order to meet the minimum requirements outlined in the Checklist of Minimum Requirements provided by the Metropolitan Council.</p>	Y	<p>Density table, including Urban Center, is provided in Figure LU-4.</p>	<p>Revise Map LU-5 to show the Thrive MSP 2040 designation for Saint Paul in its regional context.</p>	Agree

662	Alicia Valenti	Land Use	Policies LU-13 and LU-14 aim to increase using space allocated to parking more efficiently. In addition to approaches such as shared-use parking, eliminating parking minimums would be effective in allowing the market to provide an appropriate amount of parking, thus relieving the financial and environmental strains associated with building parking in excess because of minimum requirements.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>	Agree
670	Michael Sonn	Land Use	We should be discussing eliminating parking minimums city-wide.	y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>	Agree
671	Michael Sonn	Land Use	There should dozens of more neighborhood nodes.	Y	OK	Add Neighborhood Nodes on the Future Land Use Map to the following intersections: Selby-Milton; Snelling-St. Clair; Snelling-Minnehaha; E 7th-Payne; Arcade-Case; Arcade-Maryland; White Bear-Minnehaha; White Bear-Suburban; Cook-Phalen.	Agree
674	Michael Sonn	Land Use	<ul style="list-style-type: none"> Policies LU-13 and LU-14 aim to increase using space allocated to parking more efficiently. In addition to approaches such as shared-use parking, eliminating parking minimums would be effective in allowing the market to provide an appropriate amount of parking, thus relieving the financial and environmental strains associated with building parking in excess because of minimum requirements. 	y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>	Agree

682	Peter Berglund	Land Use	My proposal is to eliminate the city's minimum off-street parking requirement for new multifamily housing and replace it with a maximum off-street parking requirement. Residents living in the new multifamily housing would not get permits to park on the street, of there would be only a limited number of permits issued. Existing area residents would be granted parking permits. Permit parking program costs could be paid for with fines for violators. And if the city is making so much more in property taxes, this would help offset the administration of a permit parking program.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>	Agree
684	Payne-Phalen Community Council	Land Use	a. Specially, the Payne/Phalen intersection and the 5-10-minute walk shed around that intersection should be added to the list of "Opportunity Sites" (see page 45, Map LU-3)	Y	OK	Add Opportunity Site at Payne-Phalen	Agree
686	Payne-Phalen Community Council	Land Use	c. From a readability/clarity perspective, the name of the bullet point on page 8 should be changed to "Opportunity Sites" so that it is consistent with the name of Map LU-3 on page 45.	Y	OK	Change "large redevelopment sites" to " <u>Opportunity sites</u> " on page 8	Agree
688	Payne-Phalen Community Council	Land Use	a. Unlike other chapters which are organized by goals, the Land Use Chapter has goals, but policies are organized by both geographic parts of the city and specific land use types. This makes it's hard to see how each policy relates to the five high-level goals. This is not a fatal flaw by any means, but it does make it harder to understand how the city's goals will be carried out – particularly in an equitable manner - given that as a product of history and the patterns of historic development, not all land uses are distributed evenly across the city.	Y	This chapter is organized a bit differently, but we thought it made more sense to focus policy by land use category rather than goal.	Add appendix table with policy numbers organized under goals as reference.	Agree
693	Payne-Phalen Community Council	Land Use	b. Economic growth and population growth should most definitely be focused around transit. But the transit lines that currently exists in many parts of St. Paul, parts of District 5 among them, does not in all cases serve the needs of the populations that are most transit-dependent. Ideally transit service would be provided to the places where residents are most in need (dependency) and the places with the most capacity (potential for economic growth) rather than just where service has historically been offered by Metro Transit. In other words, there are large swaths of the population (particularly in ACPs) that are not well-served by existing transit lines. That being the case, these populations are in danger of losing out on economic growth if "transit" is not more precisely spelled out. Calling out the inherent economic need for providing reliable, equitable transit service to such communities would be hugely beneficial in helping to raise those populations out of poverty.	Y	Agree with the need for a comprehensive Economic Development Strategy, and for it to be informed by the City's Racial Equity Plan.	Add a short-term item to the Implementation chapter under Land Use: <u>Initiate a city-wide, comprehensive equitable economic development strategy. It should include local-scaled topics, such as Neighborhood Nodes, as well as regional issues, such as transit and workforce development.</u>	Agree

695	Payne-Phalen Community Council	Land Use	<p>9. Page 29, section entitled “Citywide”: Policies LU-1 through LU-4 and LU-6 are all very strong. Excellent! While land use is a critical component of these policies, they are really the kernel of a strong economic development strategy by the City – and they deserve to be thought through, extrapolated, and clarified as such. As noted above, “Economic Growth” is a good thing for a good many people, but it is very rarely equitable. And the experience of American cities over many decades has demonstrated that not everyone shares in the benefits of economic growth equitably. More to the point, many people suffer and bear the unintended consequences of “someone else’s growth.” This set of policies seems to represent a true commitment by the City to change this paradigm. If so, then such intentions are so important and so consequential to our future that that commitment needs to be worked out and thought through so that something more purposeful can be put in place for that eventual reality to even be a considered possibility.</p>	Y	<p>Agree with the need for a city-wide comprehensive Economic Development Strategy, and for it to be informed by the City's Racial Equity Plan.</p>	<p>Add a short-term item to the Implementation chapter under Land Use: <u>Initiate a city-wide, comprehensive equitable economic development strategy. It should include local-scaled topics, such as Neighborhood Nodes, as well as regional issues, such as transit and workforce development.</u></p>		Agree
699	Payne-Phalen Community Council	Land Use	<p>11. Page 29, Policy LU-6: This policy is (mostly) fantastic. But it’s not land use policy.; its economic development policy – and its needs and deserves to be thought out and articulated in a much more detailed and comprehensive manner than is otherwise possible when it is standing-in as a land use policy alone.</p>	Y	<p>Agree with the need for a city-wide comprehensive Economic Development Strategy, and for it to be informed by the City's Racial Equity Plan.</p>	<p>Add a short-term item to the Implementation chapter under Land Use: <u>Initiate a city-wide, comprehensive equitable economic development strategy. It should include local-scaled topics, such as Neighborhood Nodes, as well as regional issues, such as transit and workforce development.</u></p>		Agree
700	Payne-Phalen Community Council	Land Use	<p>12. Page 29, “Benefits of Transit-Oriented Development” and page 30: “Applying ACPs to St. Paul:” These sidebars are very useful in many ways. That said, we think that both of these need to be more emphatic on the importance of meaningful, reliable access to educational opportunities and employment opportunities from the perspective of the working public, especially the working poor. For instance, Payne-Phalen has one of the highest unemployment rates in the city, one of the lowest levels of education attainment, and one of the lowest levels of household income. This means that from an economic perspective, many households could benefit from reliable transit service – but only if it reliably connects them to clusters of employment and educational opportunity across St. Paul and throughout the Metropolitan Area.</p>	Y	OK	<p>Add text to Economic Development bullet in TOD sidebar, p. 29</p>		Agree

702	Payne-Phalen Community Council	Land Use	<p>In particular, the city is full of business parks and industrial parks that have good paying jobs (jobs that don't always require a high level of education), but too often such places don't have very good transit service – if they have it at all. That lack of service might come from the relative low-level of employment intensity as a function of low-level commercial/industrial density, i.e. the vast amounts of space given over to huge swaths of surface parking. So, because of the land use/intensity model that's been in place for many decades in developing in St. Pauls' industrial and business parks, people from high unemployment, low-education households sometime need to spend proportionately too much of their precious income on owning and maintaining a car precisely because over the years, land use policy (including TOD) has not emphasized the critical importance of employment density in such places. As a consequence, those who can least afford to eke out a car payment are compelled to do so that they can get to relatively good paying jobs in such places. And that's a Catch-22 for many working families. Others who can't afford to have a car so that they can get to business and industrial parks are left with few choices beyond such as low-wage jobs cleaning offices or working in restaurants downtown because that's the only place where the current transit lines go on a reliable basis. For example, there's no good way to use transit to connect from Payne-Phalen to the job clusters in Energy Park or the West Side Flats without a trip that is well over an hour and requires one or more transfers. Metro Transit will not even considering offering service if there isn't a certain level of residential density correlated with employment density.</p>	Y	Comment acknowledged	Change Policy LU-34 to "Provide for multi-family housing along arterial and collector streets <u>and in employment centers</u> to facilitate walking, access to jobs and the use of public transportation."		Agree
706	Payne-Phalen Community Council	Land Use	<p>a. First, we believe that the City should develop a strong and durable economic development and investment strategy to help neighborhood nodes survive and thrive. Many nodes are healthy but could use a boost to strengthen them. Too many other neighborhoods have been ravaged by the vagaries of Post-World War II suburbanization and the associate disinvestment. Those nodes still have high-levels of transit service and strong residential populations. But they need infill development of redevelopment of parcels that were given over to suburban-style design strategies in the 1960s-2000. Given the population growth expected in St. Paul in the coming decade, these next ten years are an optimal time for the City to make strategic, catalytic investments to consolidate the strength of neighborhood nodes across the city, most especially in Areas on Concentrated Poverty.</p>	Y	Agree with the need for a city-wide comprehensive Economic Development Strategy, and for it to be informed by the City's Racial Equity Plan.	Add a short-term item to the Implementation chapter under Land Use: <u>Initiate a city-wide, comprehensive equitable economic development strategy. It should include local-scaled topics, such as Neighborhood Nodes, as well as regional issues, such as transit and workforce development.</u>		Agree
709	Payne-Phalen Community Council	Land Use	<p>d. Third, we strongly recommend inclusion of two locations that we believe already are important nodes in District 5 but are not called out on the map in this draft: Arcade and Case and Arcade and Maryland both have strong commercial land uses, regular bus service and both are proximate to residential population. It's kind of mind boggling that neither of these was called out - considering that there are two buses on Arcade. We assume that was an unintentional oversight.</p>	Y	OK	Add nodes at Arcade-Case and Arcade-Maryland.		Agree

710	Payne-Phalen Community Council	Land Use	e. In addition, a node should be added at East 7th and Payne Avenue. The importance of this intersection in the city's street grid, the level and future capacity at this intersection and the strong potential for redevelopment in this location would support a mix of residential, commercial-office, commercial-retail, and education/institutional uses. This intersection has transit connectivity and the high potential for intensive redevelopment and additional transit capacity that comes with that. Such redevelopment potential in this location would have many benefits such (a) as adding employment opportunities along existing transit spines (as opposed to within business parks that have extensive surface parking), (b) providing greater opportunities to connect new and existing populations to Swede Hollow, a daylighted Phalen Creek, and (c) re-urbanizing the expanse of knicky-knacky, suburban style development patterns that stretch along East Seventh Street between Downtown and Metropolitan State University.	Y	OK	Add a node at E. 7th-Payne	Agree
711	Payne-Phalen Community Council	Land Use	f. Fourth, and not insignificantly, the legend of the map should indicate that the extent of the black line that denotes each node is a measure of comfortable walking distance to that intersection and that such proximity is a foundational to higher transit usage/service which means the possibility that fewer households need to own cars (by choice of by necessity). The addition to the legend is a readability measure. The possibilities that may come from the public understanding that measurement could or should be drawn out more clearly in a later amendment of an environmental "chapter"/strategy to the comprehensive plan.	Y	Noted. The symbol is not intended to be literal regarding size of the node.	Add disclaimer to map.	Agree
714	Payne-Phalen Community Council	Land Use	a. First, we believe strongly that the intersection of Payne and Phalen should be added to this map and the associated list. This intersection has very high redevelopment potential because it is a station stop on the planned Rush Line Bus Rapid Transit Line (BRT) and because there is a healthy handful of publicly-owned parcels that together add up to an opportunity of similar characteristics to the other sites currently listed in the draft document. It's not clear what might delineate a red star/mixed use site from a yellow-star/urban neighborhood site, but we think that this location has a very strong potential to be a much improved mixed-use, transit-oriented urban neighborhood (in real life terms if not only in professional planning lingo/categories alone). In any case, we request that you please add this site to the map and the list.	Y	Agree	Add an Opportunity Site at Payne-Phalen.	Agree

715	Payne-Phalen Community Council	Land Use	b. In addition, the stretch along East Seventh Street between Downtown and Metropolitan State University should be added to the list of "Opportunity Sites." This stretch currently feels like a void in the urban fabric – and redeveloping that void in a more dense, urban way would connect up various places (Lower Phalen business Park, Payne and West 7th in Railroad Island, and Dayton's Bluff. This stretch has a great deal of future capacity as well as the strong potential for redevelopment that would support a mix of residential, commercial-office, commercial-retail, and education/institutional uses. The area has transit connectivity and the high potential for intensive redevelopment and additional transit capacity that comes with that. Such redevelopment potential in this area would have many benefits such (a) as adding employment opportunities along existing transit spines (as opposed to within business parks that have extensive surface parking), (b) providing greater opportunities to connect new and existing populations to Swede Hollow, a daylighted Phalen Creek, and (c) re-urbanizing the expanse of knicky-knacky, suburban style development patterns that stretch along East Seventh Street between Downtown and Metropolitan State University.	Y	OK	Add Opportunity Site along E. 7th between Downtown and Metro State University.	Agree
718	Payne-Phalen Community Council	Land Use	a. From nearby the intersection of Payne and Maryland Avenue facing south, there is a broad, sweeping view of the Mississippi River Valley and the bluffs of the West Side. This view is very dramatic, particularly at certain times of the day and year. This change in topography and the view that comes with it really enhances the very special sense of place along a several-block stretch of Payne Avenue. This is a really dramatic view for a city where so many places are characterized by their flatness in topography. The view should be noted, preserved, and enhanced.	Y	OK	Add view	Agree. All views are noted and described in attached Map LU-4 Significant Public Views.
719	Payne-Phalen Community Council	Land Use	b. Likewise, from nearby the intersection of Payne and Maryland Avenue facing west on Maryland, there is a wonderful view of the Minneapolis skyline rising up over the neighborhoods in St. Paul - especially those of the North End! Given the city's street grid, it's unlikely that this view corridor would ever be blocked, but future streetscaping and change along Maryland Avenue should take this view into account so that it can be protected and enhanced.	Y	OK	Add view	Agree. All views are noted and described in attached Map LU-4 Significant Public Views.
720	Payne-Phalen Community Council	Land Use	c. On Johnson Parkway, facing north between Phalen Boulevard and Wheelock Parkway East/East Lakeshore Drive there is a very wide and wonderful view of Lake Phalen. This view along this stretch of parkway and park land feels like a gateway to and enchanted land. This view corridor should be identified, preserved and enhanced.	Y	OK	Add view	Agree. All views are noted and described in attached Map LU-4 Significant Public Views.
721	Payne-Phalen Community Council	Land Use	d. One of the absolute best, picture postcard views of the St. Paul skyline is from the vantage point at the south end of Rivoli Street (a block south of Mt. Ida Street). It's also one of the least known, which is kind of nice too. Recent redevelopment on the west side of this block of Rivoli has capitalized on that view (no pun intended) so that it is available to new residents – which is great. But that calls for some sort more defined overlook and green space at the far south end of Rivoli to ensure that this remarkably breathtaking view is preserved and available to the general public for generations into the future.	Y	OK	Add view	Agree. All views are noted and described in attached Map LU-4 Significant Public Views.

722	Payne-Phalen Community Council	Land Use	18. Page 48, Map LU-6: Gross Solar Potential: Thanks for adding this map! It's important to be thinking about energy as a topic going forward. Two comments: a. In the interest of expanding public education and conversancy on this topic, it might be good to notate the map to indicate this is about the potential for solar energy collection, not use. It's fairly obvious, but in a time when community solar energy is available in many locations, it would be good to ensure that no one in the public is dissuaded because they might have been confused by this otherwise very useful graphic.	Y	OK	Add note to map	Agree
723	Payne-Phalen Community Council	Land Use	58. Those chapters where the sequence of policies is closely tied to the numbering and sequence of goal statements are the easiest to read, understand, and absorb. In cases such as the land use chapter, the organization is by a professional typology – not policy goals. So, while that makes sense in relating policy to specific types, this choice makes it tough to trace whether such policies might actually be effective in helping to realize the goals of the chapter.	Y	OK	Add appendix table with policy numbers organized under goals as reference.	Agree
724	Payne-Phalen Community Council	Land Use	Here's the nut of it: First, the draft document includes very strong and very purposeful intention about equitable economic development going forward – but much of it is masquerading as land use or one of the other policy topics. Land use is an essential component to successful and equitable economic development, but they aren't the same thing. And in my estimation – as a planning professional, as a resident, and as a citizen of this metropolitan area – St. Paul could really, really benefit from a strong, articulate, and concerted economic development strategy –one that is fully explored, fully fleshed out, fully resourced and fully aligned with the city's land use, housing, and transportation policies. All of the components of economic development - Education, employment, commerce, industry, property development and revitalization – matter to our lives for each and every one of us. Its where opportunity lives and grows. Unfortunately, it's also where too many currently living in St. Paul just can't reach that opportunity.	Y	Agree with the need for a city-wide comprehensive Economic Development Strategy, and for it to be informed by the City's Racial Equity Plan.	Add a short-term item to the Implementation chapter under Land Use: <u>Initiate a city-wide, comprehensive equitable economic development strategy. It should include local-scaled topics, such as Neighborhood Nodes, as well as regional issues, such as transit and workforce development.</u>	Agree
725	Amy Gunderman (LHCC)	Land Use	The Board requests that you address the inconsistent treatment of Dunlap and Selby in the City's draft 2040 Comprehensive Plan as compared to the Union Park District Council's Community Plan.	Y	OK	Move Neighborhood Node at Selby-Dunlap to Selby-Milton	Agree
726	Amy Gunderman (LHCC)	Land Use	The draft 2040 Comprehensive Plan identifies the corner of Selby and Dunlap as a "Neighborhood Node." (The Comprehensive Plan incorrectly refers to this node as located at Selby and Milton on page 33, but accurately includes the Node on Map LU-2, according to Principal City Planner Anton Jerve.)	Y	OK	Move Neighborhood Node at Selby-Dunlap to Selby-Milton	Agree

727	Amy Gunderman (LHCC)	Land Use	According to the Comprehensive Plan, "The Neighborhood Node designation is based on locations planned for higher-density, mixed-use development in adopted small area, neighborhood and master plans; community feedback on locations with market potential and neighborhood support; review of current zoning designations; analysis of current and future land use; and locations of existing or planned transit" (33). This language contradicts the Union Park Community Plan, which states, "Smaller scale residential and smaller scale commercial uses are the most appropriate uses for the predominantly residential mixed-use corridor of Selby Avenue between Lexington parkway and Ayd Mill Road. If new development should occur in this segment, it would preferably occur at existing commercially-zoned nodes" (LU1.4).	Y	OK	Move Neighborhood Node at Selby-Dunlap to Selby-Milton		Agree
728	Amy Gunderman (LHCC)	Land Use	The language for LU1.4 was developed through an extended, joint community engagement process conducted by Union Park District Council and the Lexington-Hamline Community Council at the request of City Planners Hillary Lovelace and Kady Dadlez. More about this process and reasoning is described in my letter to the Planning Commission, dated December 5, 2017 (enclosed). Provision LU1.4 was approved by the City Planning Commission on February 23, 2018, and by City Council on April 4, 2018, as an amendment to the full Union Park Community Plan.	Y	OK	Move Neighborhood Node at Selby-Dunlap to Selby-Milton		Agree
729	Amy Gunderman (LHCC)	Land Use	The City's draft Comprehensive Plan does not account for the engagement work done by the Union Park District Council and by the Lexington-Hamline Community Council as it regards the intersection of Selby and Dunlap. Our shared community members expressed clear opposition to the higher-density, mixed-use development described in the draft Comprehensive Plan, as reflected in the Union Park Community Plan. The Board requests that the language at issue be removed from the City's draft 2040 Comprehensive Plan. Thank you for your help in this matter.	Y	OK	Move Neighborhood Node at Selby-Dunlap to Selby-Milton		Agree
734	Bill Dermody	Land Use	Add a Neighborhood Node to Map LU-2 at Cook/Phalen (just SW of Johnson/Phalen) to reflect late 2018 addition of a Rush Line station here.	Y	OK	Add node at Cook-Phalen	43	Agree
738	District 1 Land Use Committee	Parks	pg. 102: We request you add a new "proposed regional trail search corridor" along the Union Pacific RR Altoona Subdivision from Johnson Pkwy to the eastern city limits to be named "Phalen - Lake Elmo" and connecting those two regional parks.	Y	Agree, would connect two regional park facilities. Rail is in active service, but identifies potential of the corridor.	Add Proposed Regional Trail Search Corridor from Lake Phalen to eastern city limits to Map P-3.	102	Agree
740	Saint Paul Parks and Recreation Commission	Parks	We must review (types) of sports and hours of operation, etc. in communities we serve.	Y	Policy PR-9 already does this, but doesn't include advancing equity as a goal.	"Use customer and resident feedback on needs, satisfaction and trends to improve park experience, <u>advance equity</u> and bring in new users."	96	Agree
743	Saint Paul Parks and Recreation Department	Parks	Consider changing Implementation Item #8 from "Update" to "Review" since it is uncertain that updates would be necessary.	Y	Agree.	Update <u>Review</u> adopted master plans in response to for conformance with the 2040 Comprehensive Plan.		Agree

745	Saint Paul Parks and Recreation Commission	Parks	Specific amenities and features that are still high priority items in the Parks and Recreation system aren't specified or called out in any policy item, including; golf courses, play areas, pools, and the Como Park Zoo & Conservatory.	Y	Agree that these important elements need to be identified.	Revise introduction to include Como and expand description of things beyond land and buildings (zoo, play areas, pools, golf courses).	94	Agree. New text in attached "Non-Policy Recommended Revisions in Parks Chapter of 2040 Comprehensive Plan," dated 2/22/19.
747	Saint Paul Parks and Recreation Commission	Parks	Specific partnerships, especially long-standing ones that have benefited the department and city over the course of several decades, aren't called out in any policy item, including the long-standing partnership with Como Friends at the Como Park Zoo & Conservatory	Y	Agree, provide example of Como Friends.	PR-29. Seek out partnerships with private entities, <u>such as Como Friends</u> , to finance capital and maintenance costs...	97	Agree
750	Saint Paul Parks and Recreation Commission	Parks	An evaluation of where we are compared to the national scale.	Y	Trust for Public Land annual reports track this.	Mention national standing in introduction.	94	Agree. New text in attached "Non-Policy Recommended Revisions in Parks Chapter of 2040 Comprehensive Plan," dated 2/22/19.
751	Saint Paul Parks and Recreation Commission	Parks	PR-5: Add - 'play areas, pools, and other amenities' after Community Centers.	Y	Agree	PR-5. Prioritize investment in physical assets of Community Centers, <u>play areas, pools, and other amenities</u> to ensure that common minimum standards are met. Implementation Item #12: Develop a set of measurable performance standards for all Community Centers, <u>play areas, pools, and other amenities</u> .	95	Agree
752	Saint Paul Parks and Recreation Commission	Parks	PR-6: Change - 'recreation AT neighborhood and community parks' from TO neighborhood and community parks'.	Y	Agree	PR-6. Use mobile recreation to fill park or recreation service gaps, enhance events, and provide quality recreation to <u>at</u> neighborhood and community parks.	95	Agree
753	Saint Paul Parks and Recreation Commission	Parks	PR-28 or PR-29: To address the lack of acknowledgement from the non-profit supporters of the system, like Como Friends (mentioned above), could add "Como Friends" as an example for collaboration or fostering current relationships.	Y	Agree	(Done as part of earlier comment.) PR-29. Seek out partnerships with private entities, <u>such as Como Friends</u> , to finance capital and maintenance costs...	97	Agree
754	Saint Paul Parks and Recreation Commission	Parks	On page 95 - In the text under "Perceptions of Park" - refine the whole description and paragraph to reflect the fact that definitions do not always translate to preference. Staff would welcome the opportunity to help refine.	Y	Agree - Parks staff has provided feedback on this, and PED staff will revise.	Revise sidebar: Perceptions of Park.	95	Agree. New text in attached "Non-Policy Recommended Revisions in Parks Chapter of 2040 Comprehensive Plan," dated 2/22/19.

755	Tom Dimond	Parks	Implement access from our neighborhoods to our riverfront. Pedestrian, bicycle and wildlife connections are essential for residents and visitors to access and enjoy the health and wellness benefits that should be available to all. The Eastside in particular has a sever shortage of safe access. Pigs Eye Parkway and the trails shown in the Great River Passage Plan are a priority for implementation.	Y	Agree the Mississippi is underrepresented in this city-wide Comprehensive Plan, but the <i>Great River Passage Master Plan</i> , adopted as an addendum to the Comprehensive Plan in 2013, has connections to and along the river as a core principle. In the 2040 draft, access is addressed somewhat through PR-2: reduce physical barriers, and PR-37: Improve ped and bike connections between park facilities and other significant destinations such as rivers..., but a more direct policy should be added.	NEW <u>Policy PR-43. Support facility improvements that better connect neighborhoods to the Mississippi River.</u> Add reference to GRP in sidebar or introduction.	98	Agree. New text on Great River Passage Master Plan in attached "Non-Policy Recommended Revisions in Parks Chapter of 2040 Comprehensive Plan," dated 2/22/19.
759	Tom Dimond	Parks	In Highwood, work to protect natural areas and restore habitat including the numerous parcels of parkland/open space. The City and County should develop a joint management plan, including trail access, public scenic points, signage to identify public open space and designation as part of the Regional Parks and Open Space system.	Y	Agree that policy re: habitat and ecology is lacking.	New policy after PR-27 in Environmental and Economic Sustainability section: <u>Policy PR-XX. Promote the ecological function of parkland and open space, while balancing it against nature-based recreation and other public uses.</u>	97	Agree
766	Tom Dimond	Parks	Establish parkland zoning and maintain a public record of all land that is parkland.	Y	Implementation Item #3 calls to maintain accurate maps. Additional clarity is appropriate. Regarding parkland zoning, PED staff prepared a memo for P&R Commission and Planning Commission consideration.	Revise Implementation Item #3 to read: <u>Maintain accurate maps that show, at a minimum: city parks, service area, property boundaries, transit access and physical barriers.</u>	220	Agree with proposed new language for Implementation Item #3. Add new Short-Term Parks Chapter Implementation item to read: <u>Complete the Parks, Civic and Open Space Zoning Study initiated by Planning Commission Resolution 14-11, removing the reference to Parks Policy 2.1 in the 2030 Comprehensive Plan.</u> Referenced memo to Parks and Recreation Commission is attached to 3.14.19 memo to Planning Commission from Comprehensive and Neighborhood Planning Committee.

769	Nancy O'Brien Wagner	Parks	All maps should clearly show which spaces are parklands and cemeteries. It is misleading to not differentiate these spaces when outlining things like "poverty rates" or "households with out cars."	Y	Per general revision: Maps IN-1 through IN-11 should show parks and open space areas on the base.	Per general revision: Add parks and open spaces to Maps IN-1 through IN-11.	15-27	Agree
772	Nancy O'Brien Wagner	Parks	Page 95 - The information on what perceived barriers exist for minority residents in regards to parks is only helpful if you also describe what perceived barriers exist for white residents. You may actually be creating or perpetuating a false sense of differences between groups. (I suspect time, and lack of awareness might apply to white visitors, too.)	Y	Comment acknowledged. Will be revising this language per other comments.	Revision to Perception sidebar.	95	Agree. New text in attached "Non-Policy Recommended Revisions in Parks Chapter of 2040 Comprehensive Plan," dated 2/22/19.
776	Nancy O'Brien Wagner	Parks	Where is the reference to protecting the natural assets of parks? The water resources? The animals and wildlife?	Y	Agree - new policy makes sense.	New policy after PR-27 in Environmental and Economic Sustainability section: <u>Policy PR-XX. Promote the ecological function of parkland and open space, while balancing it against nature-based recreation and other public uses.</u>	97	Agree
777	Nancy O'Brien Wagner	Parks	The only mention of beauty comes in a reference to encouraging private entities to beautify their lands. Shouldn't public parks be beautiful?	Y	Point taken - will try to incorporate in intro.	Incorporate into introduction	94	Agree. New text in attached "Recommended Narrative Revisions in Parks Chapter of 2040 Comprehensive Plan," dated 2/22/19.
785	Friends of the Park and Trails	Parks	It is important that mention be made of the No Net Loss Provision in the Saint Paul City Charter. This provision is highly relevant to all development decisions involving our park system and yet there is no reference to it.	Y	Agree that this is important and should be referenced.	Add note in Intro or sidebar that repeats language in existing plan: "One of the ways that parkland in Saint Paul is protected for future park users is the City's "no net loss" policy. This policy is a part of Saint Paul's City Charter, Section 13.01.1, and reads, "Lands which may have been heretofore acquired by any means or which may hereafter be acquired by any means for park purposes shall not be diverted to other uses or disposed of by the city. When the City Council decides that diversion or disposal of parkland is in the public interest, additional parklands must be acquired to replace the lands that are diverted, preferably within the same District Council area and of a similar nature to the diverted parkland."	97?	Agree. New text in attached "Recommended Narrative Revisions in Parks Chapter of 2040 Comprehensive Plan," dated 2/22/19.

786	Friends of the Park and Trails	Parks	There is currently no official map of the city's parkland, making the goals of maintenance and asset management particularly challenging. We recommend the city make mapping parkland a priority.	Y	Addressed in implementation item #3, but could be clarified.	Implementation Item #3: Maintain accurate maps that show, at a minimum: <u>city parks</u> , service area, property boundaries, transit access and physical barriers.	220	Agree
788	Friends of the Park and Trails	Parks	There is no mention in the draft of the Parkland Dedication Ordinance. While we recognize this is a high-level document, given the goals of the plan and the value statements, and knowing it will be referenced when making funding and development decisions, it may be helpful to make note of this valuable tool that can help us reach the desired outcomes of resiliency and sustainability.	Y	Agree	Policy PR-18. Ensure that investment in City parks accounts for planned increases in development density <u>through tools such as parkland dedication</u> .	97	Agree
790	Friends of the Park and Trails	Parks	Policy PR-1. Ensure equitable access to Parks and Recreation programs, resources and amenities including, but not limited to, racial, ethnic, income, ability, and geographic diversity . (The goal is that the users of the system are reflective of the population, not solely addressing physical access to parks but actual equity of use and opportunity. This also relates to PR-4.)	Y	Agree that this could be clarified.	Restate brief description of equity from general intro in chapter intro.	94	Agree. New text in attached "Recommended Narrative Revisions in Parks Chapter of 2040 Comprehensive Plan," dated 2/22/19.
793	Friends of the Park and Trails	Parks	Policy PR-24. Develop shared-use facilities as a first option when contemplating new or replacement indoor recreation facilities while recognizing the importance of maintaining public access . (Privatization of public facilities doesn't seem to be the goal here so it's important for that to be put in writing somehow.)	Y	Public access is implied if facility is shared, but suggest the following revision instead.	"Develop <u>publicly-accessible</u> shared-use facilities as a first option..."	97	Agree
795	Friends of the Park and Trails	Parks	Policy PR-29. Seek out partnerships with private entities to finance capital and maintenance costs of Parks and Recreation facilities without compromising good design solutions, reducing public access or over-commercializing the public realm.	Y	Agree.	Policy PR-29. Seek out partnerships with private entities to finance capital and maintenance costs of Parks and Recreation facilities without compromising good design solutions, <u>reducing public access</u> or over-commercializing the public realm.	97	Agree
798	Friends of the Park and Trails	Parks	Policy PR-41. Involve staff from the Department of Parks and Recreation and park and community advocacy groups from the beginning in the early stages of discussions regarding large-scale land redevelopment sites. (We acknowledge staff plays an important role when meeting with developers at the beginning of projects and we certainly don't intend for this to be an interference with that. However, we believe it is reasonable that the public should be involved in the early stages of large-scale developments and not just after potential uses have been whittled down to certain choices.)	Y	Noted. PR-3 addresses involving stakeholders and community groups. Add "early" to emphasize importance of that.	Policy PR-3. Engage diverse community groups and all potentially impacted stakeholders <u>early</u> in setting balanced priorities for park-related matters.	95	Agree
824	Saint Anthony Park Community Council (SAP)	Parks	In the Non-Regional Park and Trail Inventory, it seems misleading to use "South St. Anthony Rec. Center," because it is leased and managed by Joy of the People soccer program, and therefore, does not provide typical City programs. We encourage use of a different name or descriptor.	Y	Agree clarity would benefit plan.	Label all partnered facilities by asterisk.	105-107	Agree

829	Michael Kuchta	Parks	Page 107: The draft does not include Northwest Como Recreation Center in its inventory of non-regional parks and trails.	Y	You are correct. The list shows only assets owned by the City. The Northwest Como Rec Center is owned by the school district.	Table Title on p. 105: <u>City-Owned Non-Regional Park and Trail Inventory</u>	105	Agree
830	Kathy Sidles	Parks	1. Saint Paul and other cities long range development plans could include no loss of green space and higher density development on already paved/developed areas.	Y	City has a no-net-loss-of-parks policy in its charter. Will add language in plan to highlight that.	Add note in Intro or sidebar that repeats language in existing plan: "One of the ways that parkland in Saint Paul is protected for future park users is the City's "no net loss" policy. This policy is a part of Saint Paul's City Charter, Section 13.01.1, and reads, "Lands which may have been heretofore acquired by any means or which may hereafter be acquired by any means for park purposes shall not be diverted to other uses or disposed of by the city. When the City Council decides that diversion or disposal of parkland is in the public interest, additional parklands must be acquired to replace the lands that are diverted, preferably within the same District Council area and of a similar nature to the diverted parkland."	97?	Agree. New text in attached "Recommended Narrative Revisions in Parks Chapter of 2040 Comprehensive Plan," dated 2/22/19.
839	Payne-Phalen Community Council	Parks	30. There are several maps dealing with parks and trails, but no maps showing locations of the recreation centers and community centers. While some recreation centers are in parks, it would be helpful to see their locations in relation to each other within the city. The centers are referenced in some of the policy goals, either as rec centers or as facilities. Considering the use of various terminology would help for readership in the general public.	Y	Agree.	Revise Map P-2 to show rec centers.	101	Agree
840	Payne-Phalen Community Council	Parks	31. Page 10-: Appendix A, Map P-3: Regional Trail Search Corridor: We could find no explanation of what this name/topic meant. Is it a general corridor where the precise location of a trail hasn't been determined yet?	Y	Agree.	Add description of what RTSC is.	103	Agree. New text in attached "Recommended Narrative Revisions in Parks Chapter of 2040 Comprehensive Plan," dated 2/22/19.
841	Payne-Phalen Community Council	Parks	32. Page 107: Appendix B, Non-Regional Park and Trail Inventory: This list includes parks, recreation centers and community centers, but there is no listing for Hancock Rec. Center (listed on the City website). An oversight? Two other rec centers, South St. Anthony Rec Center and the St. Clair Rec Center, are now "re-partnered" with other groups or agencies (according the city parks list), so are they going by a different name?	Y	The list shows only assets owned by the City. The Hancock Rec Center is owned by the school district. Should clarify title of list and indicate with an asterisk which are partnered facilities.	Table Title on p. 105: <u>City-Owned Non-Regional Park and Trail Inventory</u> . Also, label all partnered facilities by asterisk.	105-107	Agree

852	Kory Andersen	Transportation	5. Bus and light rail priority. I know there are a variety of authorities and entities involved with the twin cities transit system and roads. However, the City of Saint Paul does have some part to play in the accessibility and efficiency of our public transit system...not to mention a bully pulpit. It makes zero sense why do dozens of ppl who chose to ride a train or a bus have to wait/contend for space with individuals in single occupancy vehicles. I mean there is a history of stigmatizing the users of public transit/treating them like second class citizens. Let's lead the twin cities in this change! Bus only lanes and LRT high prioritization at signals (should not be waiting at Snelling/University for cars to go by (Also Portland, Oregon has great examples of this)), would go a long way in increasing ridership, reducing traffic, and re-balancing modes of transportation.	Y	Policy T-27 is pretty wordy, but a minor addition could be made along these lines	Policy T-27: "...land use intensity and design, <u>increased traffic signal optimization for transit</u> , working with transit providers..."	Agree
857	District 1 Land Use Committee	Transportation	pg. 56: T-15, add "including the use of smaller freight delivery vehicles."	Y	The emphasis is more so on delivery coordination and timing, so we should mention either all of these potential solutions or none. The language addition is bulky, but helps demystify the uncommon umbrella term "freight delivery solutions."	Policy T-15: "Explore freight delivery solutions that resolve loading/unloading conflicts in congested areas so as to support businesses and provide safety to pedestrians and road users. <u>Solutions could include delivery coordination and timing, and use of smaller freight delivery vehicles.</u> "	Agree
864	District 1 Land Use Committee	Transportation	pg. 68: Show the transit lines that operate on McKnight Rd.	Y	Agree	Crop Map T-7 to include McKnight and Larpenteur	Agree
865	District 1 Land Use Committee	Transportation	pg. 69: Extend the arrow for Red Rock all the way to the southern border.	Y	Agree	Amend Map T-8 as suggested	Agree
866	District 1 Land Use Committee	Transportation	We request you add a new "proposed transitway" that follows the alignment proposed in the East 7th St ABRT study and that is currently served by the 54M bus. This transitway is identified on pg. 6.67 of the Transportation Policy Plan under the Increased Revenue Scenario.	Y	Agree	Add red arrow to Map T-8 on E 7th between downtown and Arcade	Agree
867	District 1 Land Use Committee	Transportation	pg. 73 & 74: Show the AADT of McKnight Rd. Traffic volume is a significant factor in decisions made about that road in the future.	Y	Agree	Crop Maps T-12 and T-13 to include McKnight and Larpenteur	Agree
891	David Sullivan-Nightengale	Transportation	Page 80: Dale Street Bridge over I-94 is not a potential project - it is currently a planned project.	Y	Agree.	Delete "Dale Street Bridge over I-94" from Appendix B	Agree
894	Chelsea DeArmond	Transportation	Even though there is a policy (T-4) to develop electric vehicle infrastructure, there is no policy to transition the city's fleet to electric vehicles. I want the city to take a leadership role in the transition to carbon-free energy and transportation that we all need to make. The next 20 years are a critical time for our city and our planet.	Y	This is being addressed in the Climate Adaptation and Resilience Plan. We could also address it in the Implementation Chapter.	New "ongoing" Implementation Chapter item in Figure I-1: " <u>Transition City vehicle fleets to electric propulsion, including typical passenger vehicles in the short- to medium-term, and larger vehicles and public safety vehicles as technology allows.</u> "	Agree

895	Jean Comstock	Transportation	Compliments on Policy T-4: Significantly reduce carbon emissions from motor vehicles by developing infrastructure that supports vehicle electrification. However, I would also like to see plans and a timeline for electrification of the St. Paul City's fleet (including city and police cars). If this is not the right document to address this, could you please tell me where it might be (for example, the next climate action plan)?	Y	This is being addressed in the Climate Adaptation and Resilience Plan. We could also address it in the Implementation Chapter.	New "ongoing" Implementation Chapter item in Figure I-1: " <u>Transition City vehicle fleets to electric propulsion, including typical passenger vehicles in the short- to-medium-term, and larger vehicles and public safety vehicles as technology allows.</u> "		Agree
903	Al Davison	Transportation	Arterial Bus Rapid Transit (aBRT) and improving frequencies on other bus routes can help support existing transit riders along with adding new riders. These bus investments that can be made in the short-term, rather than having people waiting for until the 2030-40s for better transit (such as fixed rail transit). Corridors such as West 7th need improvements to the 54 bus route immediately rather than just waiting for the Riverview Corridor streetcar to be built. The North End and the East Side need better buses; giving the buses signal priority at some traffic signals like the A-Line aBRT and Green Line light rail line can help speed up travel times.	Y	ABRT comment noted. Policy T-27 is pretty wordy, but a minor addition could be made along these lines. [See also Kory Anderson comment on T-27]	Policy T-27: "...land use intensity and design, <u>increased traffic signal optimization for transit</u> , working with transit providers..." [See also T-27 revision in response to Kory Anderson]		Agree
913	Tom Dimond	Transportation	T-38&39 - support - land bridge might be a better name than freeway lid (page 58)	Y	We agree.	Revise Policy T-39 and Policy LU-53: "...such as <u>"freeway lids"</u> <u>"land bridges"</u> and..."	58	Agree.
928	Saint Anthony Park Community Council (SAP)	Transportation	Redevelopment and reuse of the industrial area in the Creative Enterprise Zone carries with it the need to provide better access (Policy T-14). The proposed ten-year plan for Saint Anthony Park calls for Prior Avenue or Transfer Road to be extended to Energy Park Drive and possibly Como Avenue to make the industrial area attractive to new businesses. This would also give the Creative Enterprise Zone industrial area direct access to Highway 280 and Snelling Avenue, thus relieving traffic congestion on University Avenue, I-94, and local streets (Policy T-37). This connection should be added to Map T-14: Future Right of Way Needs and planning should be commenced in the near future. It is noted that this connection is already shown as part of the Regional Bicycle Transportation Network on Map T-4.	Y	In fact, this connection is in an adopted plan. As a major new arterial-level street connection, we should add it to the map.	Add Prior/Transfer connection to Map T-14 as called for in the West Midway Industrial Area Plan.		Agree
937	Saint Anthony Park Community Council (SAP)	Transportation	7. In support of Policy T-37, evaluate whether to prohibit semi trucks for delivery to local retail establishments not located on truck routes, with consideration of the economic consequences to the retailers.	Y	This would require a separate study.	New Medium-Term Implementation Chapter item in Figure I-2: " <u>Evaluate how and where trucks should be accommodated in street and site design to maintain economic vitality while prioritizing pedestrian and bicyclist safety. Then revise the truck route map, Street Design Manual, City ordinances and other official policies accordingly.</u> "		Agree

938	Saint Anthony Park Community Council (SAP)	Transportation	8. With regard to Policy T-42, we are concerned that increased ride hailing and home delivery will result in blocked bike lanes and crowded intersections. We suggest you include a policy that creates delivery and ride-sharing drop-off zones per block that do not obstruct bike lanes and are not too near intersections.	Y	Incorporate this concept into T-42.	Amend Policy T-42: "Ensure that right-of-way design <u>and management</u> accounts for changing vehicle technologies and forms of use, such as automated vehicles, car-sharing, <u>curbside pickup and delivery, ride-hailing and ride-sharing.</u> "	Agree
940	Saint Anthony Park Community Council (SAP)	Transportation	10. Bike parking is mentioned in this chapter only in the context of special events. Please add a commitment to covered bike parking at or near light rail stations.	Y	Bike parking near LRT was intended to be covered in Policy T-28, but could be more explicit. Proposed revisions have been run by Chief Resiliency Officer Stark.	Amend Policy T-28 "Facilitate intermodal trips at mobility hubs (where transportation modes convene or intersect <u>walking, biking, public transit, ridesharing and carsharing are intentionally designed to connect</u>) by providing enhanced security, lighting, information, <u>shelter, placemaking,</u> comfort and convenience."	Agree
945	Saint Anthony Park Community Council (SAP)	Transportation	15. There are several issues with Map T-15. There are areas shown as key freight facilities that are no longer used for such purposes. These include the KSTP building, the former Weyerhaeuser property, and the former Case property. The map should be updated to reflect current use. Information for Raymond Ave and Energy Park Drive is out of date; the low clearance bridge icon should be removed. An icon indicating inadequate turning radius is needed at 280/University interchanges. Semis cannot make the turn to EB 94 from Franklin Ave in normal traffic.	Y	Agree	Update Map T-15 with latest land use info. If Weyerhaeuser still shows as Industrial, then at least change that site's designation. Add "potentially inadequate turning radii" icon to 280/Franklin intersection.	Agree

946	Saint Anthony Park Community Council (SAP)	Transportation	16. Map T-18 plots Transit Market Areas, but these are not defined in the Plan. There is no reference point for readers to understand what the map implies.	Y	Agree	and Appendix C (Anton/Mike). 1. In Appendix A, add an asterisk to the title of Map T-18. In the map's legend area, similar to Map T-11, add this language: <u>"*See Appendix C for Transit Market Areas descriptions."</u> 2. Add the following text to Appendix C under a new #6: <u>"Transit Market Areas are Metropolitan Council designations that indicate the likely cost effectiveness of transit service investments. Transit Market Area I has the potential transit ridership necessary to support the most intensive fixed-route transit service, typically providing higher frequencies, longer hours, and more options available outside of peak periods. Market Area II can support many of the same types of fixed-route transit as Market Area I, although usually at lower frequencies or shorter service spans. Market Area III primarily supports commuter express bus service with some fixed-route local service providing basic coverage. Market Area IV can support peak-period express bus services if a</u>	Agree
953	Karen Allen	Transportation	<ul style="list-style-type: none"> • LU-13 Change "reduce parking minimums" to "eliminate". Especially pertinent for small multi-family residences (duplex up to 'missing middle' style buildings) 	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to <u>"overall."</u> Add City-wide Policy LU-XX. <u>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.</u>	Agree

961	Saint Paul Bicycle Coalition	Transportation	<ul style="list-style-type: none"> • Goal 3, involving freight and especially truck freight, should place more emphasis on moving truck traffic away from routes on walkable and bikeable urban streets. These trucks have difficult geometry and immense mass, which makes them especially deadly in the event of a crash and they often necessitate street designs (like "Slip turns") that are inherently unfriendly to bicycles and pedestrians. Pedestrian and bicycle friendly street areas should be served by smaller and more maneuverable vans and other solutions. 	Y	The Street Design Manual (SDM) provides guidance, but staff agrees it is reactive to existing truck traffic and not proactive about exploring ways to move large truck design accommodations away from pedestrians and bikes. The SDM, it should be noted, discourages slip turns. Staff believes this warrants a full separate study.	New Medium-Term Implementation Chapter item in Figure I-2: " <u>Evaluate how and where trucks should be accommodated in street and site design to maintain economic vitality while prioritizing pedestrian and bicyclist safety. Then revise the truck route map, Street Design Manual, City ordinances and other official policies accordingly.</u> "	211	Agree
964	Saint Paul Bicycle Coalition	Transportation	<ul style="list-style-type: none"> • Policy T-28 should encourage bike racks or other secure bike parking at multimodal hubs. 	Y	Bike parking near LRT was intended to be covered in Policy T-28, but could be more explicit. Proposed revisions have been run by Chief Resiliency Officer Stark.	Amend Policy T-28 "Facilitate intermodal trips at mobility hubs (where transportation modes convene or intersect walking, biking, public transit, ridesharing and carsharing are intentionally designed to connect) by providing enhanced security, lighting, information, <u>shelter, placemaking, comfort and convenience.</u> "		Agree
971	Shannon O'Toole	Transportation	Lastly, the suggestions that Ayd Mill Road should be connected to I-94 on pages 75 and 80 were noticed. Please go back to the suggestions made when Randy Kelly wanted to connect Ayd Mill Road to I-94 - most people wanted a bike and pedestrian way with the stream recovered. What a great and futuristic way to improve the bike, pedestrian, and water resources of the city! The last thing we need is another freeway abutting District 16. Improve the I-35E - I-94 westbound connection downtown if that is needed and close down Ayd Mill Road to automobile traffic.	Y	The map shows future ROW - it does not dictate design, which could be a bike/pedestrian way as suggested. Design will be done through future study. Some language change is appropriate to ensure clarity.	Change title of Map T-14 to " <u>Potential Future Right-of-Way Connections.</u> " Change labels to " <u>Ayd Mill Corridor,</u> " " <u>Kittson Corridor,</u> " and " <u>Pierce Butler Corridor.</u> "		Agree. In addition, add a note to Map T-14 that says: <u>Mode type(s) and right-of-way design will be determined through future study.</u>

	Jessa Anderson-972 Reitz	Transportation	We should follow the Minneapolis 2040 plan and relax government restrictions on multi-family housing throughout the city and eliminate parking requirements.	Y	<p>The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.</p>	<p>Edit Policy LU-13: Change "minimums" to "<u>overall.</u>" Add City-wide Policy LU-XX. <u>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.</u></p>	Agree
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977	Kody Sherlund	Transportation	The single most effective way the city can influence increasing the supply of housing is to change zoning laws (allow for duplexes, triplexes, townhomes, and the "missing middle" in general) and to promote infill without minimum parking requirements.	Y	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>	Agree
980	Barry Reisch	Transportation	I hope the City of St. Paul will plan as part of its vision to focus on the destruction of our roadways and environment by excessive salt use. We are very destructive as we bomb our roads with salt in the winter and then spend thousands of dollars repairing the damage in the spring, summer and fall. This process also contributes to climate change with the large amounts of fuel consumed by our trucks, all the oil consumed in repaving and repairing roads, etc.	Y	Covered directly by policy WR-17 and indirectly by WR-16. Could also add "environmental sustainability" concept (including salt use) to existing maintenance policy.	Revise the second T-34: "Pursue fiscally- <u>and environmentally-</u> sustainable models for equitably maintaining transportation infrastructure..."	Agree
989	Jeff Zaayer	Transportation	Map T-14 Future Right of way needs: this map is concerning as the two larger corridors of identified need occur in ACP50 portions of the city and all 3 cut through valuable industrial land and park space. I hope the city takes serious consideration into the damage these high traffic corridors would do not only to the tax base in Saint Paul but also to the community impact of barriers that corridors like these can create in addition to the health disparities by putting more people in proximity to high traffic corridors.	Y	The map shows future ROW - it does not dictate design, which could be a bike/pedestrian way as suggested. Design will be done through future study. Some language change is appropriate to ensure clarity.	Change title of Map T-14 to "Potential Future Right-of-Way Connections". Change labels to " <u>Ayd Mill Corridor,</u> " " <u>Kittson Corridor,</u> " and " <u>Pierce Butler Corridor.</u> "	Agree

992	Cory Zwiefelhofer	Transportation	2. Eliminating parking minimums altogether needs to become public policy;	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>	Agree
995	Jake Reuter	Transportation	Parking minimums should be eliminated from Saint Paul's zoning code. Establishing artificial floors on the number of parking spaces that a development must provide increases the cost of development and ultimately rent or businesses and residents, regardless of whether or not they need the parking.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>	Agree

998	Philip Bussey	Transportation	I think this comprehensive plan should recognize the negative impact that exclusively zoning for single family homes has done to our city and allow for multi family dwellings throughout the entire city, increase where mixed-use buildings are allowed, and remove parking minimums.	Y	The current draft of the 2040 Comprehensive Plan already supports a diversity of housing choice and densities within the city's Urban Neighborhoods (e.g. LU-33, LU-34, H-16, H-36, H-46 and H-48). Adoption of the Comprehensive Plan does not make these policies law, but it does set the stage for subsequent zoning studies that may recommend allowing multi-family units in single-family zoning districts. To further support this work, the City Council in June 2018 requested (RES 18-1204) that the Planning Commission conduct a zoning study to allow triplexes and fourplexes in single-family zoning districts. This work will begin after adoption of the 2040 Comprehensive Plan, and will be listed in Figure I-1 in the Implementation Chapter. It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>		Agree
1001	Brendan O'Shea	Transportation	Ensure that policy T-14 does not conflict with policy T-3; freight corridors are also used by cyclists and pedestrians, and their safety as vulnerable users should be prioritized in all Saint Paul streets. Streets can be both safe and commercially productive.	Y	The Street Design Manual provides guidance, but staff agrees it is reactive to existing truck traffic and not proactive about exploring ways to move large truck accommodations away from pedestrians and bikes. The SDM, it should be noted, discourages slip turns.	New Implementation Chapter item in Figure I-2: " <u>Evaluate how and where trucks should be accommodated in street and site design to maintain economic vitality while prioritizing pedestrian and bicyclist safety. Then revise the truck route map, Street Design Manual, City ordinances and other official policies accordingly.</u> "		

1006	Michael Healy	Transportation	The plan looks great except for one major flaw. It needs to be amended to call for the elimination of minimum off-street parking requirements, at least for commercial and industrial businesses and possibly some types of residential development as well. The policy goal could be formatted as something along the lines of "The City will eliminate minimum parking requirements for commercial and industrial properties and explore the elimination or reduction of minimum parking requirements for residential properties."	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>	Agree
1007	Michael Healy	Transportation	The usefulness of minimum parking requirements has been thoroughly debunked and they have very little support these days from anyone who takes the issue seriously. The requirements are even starting to lose support in rural areas and amongst conservatives, despite their "pro-car" attitudes, because minimum parking requirements are anti-business and flat-out don't work well. Minimum parking requirements represent an unnecessary and heavy-handed "big government" intervention into the marketplace which attempts to solve a problem that doesn't even exist. Most businesses that need parking are going to build parking as they won't be able to get bank financing otherwise. Developers will build the type of parking that they need to build to keep their tenants happy. The free market will figure parking out and 99% of the time will do a better job than the zoning code's arbitrary parking requirements. Cities kill or hurt good projects all the time by making an arbitrary determination that "there isn't enough parking." The business then either has to try to get a variance (costly, time-consuming, and prone to sabotage by neighborhood groups and other businesses) or has to buy up neighboring properties to bulldoze them and put up more parking. More often than not, this results in an oversized parking lot that sits at least partially empty most of the time. Also, the City loses the tax base from the buildings that had to be bulldozed to create the parking.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>	Agree
1008	Michael Healy	Transportation	Parking costs of lot of money to build. Building unnecessary extra parking stalls (surplus stalls built just to please the City) drives up the cost of development. Structured parking generally ends up costing somewhere between \$20,000-\$30,000 per parking stall. Surface parking is cheaper (but still not cheap) but it eats up a ton of land and makes a neighborhood uglier and less walkable. Nobody wins when there is "too much" parking, both the property owner and the City are losers in that situation. It doesn't seem reasonable to talk about wanting development and housing to be "affordable" but then turn around and impose unnecessary mandates that drive up development costs and make everything less affordable. Developers are going to build parking if their project needs parking. There's no benefit in having the City require even more parking beyond what the free market is already providing, especially when our stated goal is encouraging people to drive less and consider using transit or active transportation.	Y	PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>	Agree

1009	Michael Healy	Transportation	Minimum parking requirements have caused immense harm to American cities since their widespread adoption in the 1960's. None of Saint Paul's most interesting/walkable neighborhoods would be allowed to be built today because of minimum parking requirements. Selby/Dale, Grand Avenue, Snelling/Selby, and all of the cute little streetcar nodes fail to have "enough" parking under the code and would not be allowed to be built in 2018.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>	Agree
1010	Michael Healy	Transportation	It would be a huge missed opportunity if we failed to include this goal in our 2040 plan. Honestly, I don't think its possible to achieve any of the other goals regarding walkability, housing affordability, increased transit usage, etc. if this issue isn't addressed. By 2040, most cities aren't going to have minimum parking requirements, everything is moving in that direction. Saint Paul has an opportunity to be a leader in this. Please, let's get some language in our comprehensive plan!	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>	Agree
1027	Michael Sonn	Transportation	We should be discussing eliminating parking minimums city-wide.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>	Agree
1034	Andrew Singer	Transportation	Then you don't define "equity". Do you mean "equity between modes" (bike, pedestrian, transit, car)? ...or do you mean racial equity as in "we have to prioritize this project because it's in a largely Hmong or African American neighborhood"? This is important because, as written, "Safety and equity" are more important than "maintenance" or the age of a given piece of infrastructure.	Y	We mean racial and social equity.	Amend T-1 to read: Prioritize safety and racial and social equity benefits in project selection, followed by support....	Agree
1044	Andrew Singer	Transportation	Policy T-13, break into two sentences so it reads: "When street design changes involve the potential loss of on-street parking spaces, prioritize safety for all transportation modes. Explore mitigation of lost spaces where feasible."	Y	OK	Policy T-13, break into two sentences so it reads: "When street design changes involve the potential loss of on-street parking spaces, prioritize safety for all transportation modes. Explore mitigation of lost spaces where feasible."	Agree
1046	Andrew Singer	Transportation	Policy T-15, add the words "and provide safety to pedestrians, cyclists and other road users."	Y	OK	Policy T-15: "...support businesses and provide safety to pedestrians, bicyclists and other road users."	Agree

1047	Andrew Singer	Transportation	In general, GOAL 3 lacks any discussion of truck routes, or what priority is going to be given to trucks on the arterial and collector streets that Ramsey County or MnDOT have decided are truck routes and need to be designed with wider lanes, no bump-outs, and slip turns for higher-speed truck turning radii. These streets, like Seventh and Snelling are among the most dangerous for pedestrians and cyclists in our city, and a lot of this has to do with their design. Not only are these streets three and four lanes but they are three and four lanes that are designed for high speeds and larger turning radii. Other than Map T-15, Policy T-35 is the only place in the plan where truck route consolidation/identification is talked about and only in the context of pavement condition. It should also be discussed in the context of how designing for trucks impacts the safety of non-motorized users.	Y	The Street Design Manual provides guidance, but staff agrees it is reactive to existing truck traffic and not proactive about exploring ways to move large truck accommodations away from pedestrians and bikes. The SDM, it should be noted, discourages slip turns.	New Implementation Chapter item in Figure I-2: " <u>Evaluate how and where trucks should be accommodated in street and site design to maintain economic vitality while prioritizing pedestrian and bicyclist safety. Then revise the truck route map, Street Design Manual, City ordinances and other official policies accordingly.</u> "	Agree
1057	Andrew Singer	Transportation	Maps T-14 and T-16: I am totally opposed to the "Ayd Mill Road Redevelopment Project" mentioned in Map T-14 "Future Right of Way Needs" and in Appendix B. No where in the plan is this project spelled out. This road was unilaterally and illegally connected at the south end by former mayor Randy Kelly, over community opposition and without a supplemental Environmental Impact Statement. To include it in a city comprehensive plan without proper public review is illegal and contrary to the notion of "public planning." Mayor Norm Coleman's task force on Ayd Mill Road chose a "Linear Park" option as did the Lexington-Hamline and Snelling-Hamline Community Councils. The Merriam Park Community Council selected "No Build". Yet, since 1960, your agency and the city's elected officials keep trying to ram through an Ayd Mill highway connection from I-35 to I-94 over public opposition. It's much the same thing with the Pierce Butler and Kittson Extensions (referenced in Map T-14 and T-16). While other cities are tearing down urban freeways, redeveloping the land, and making money by doing so, Saint Paul is proposing to build new highways. It's byzantine, automobile-addicted thinking of the highest order. How can the Transportation Chapter of this plan state that it prioritizes maintenance, pedestrians and all its other lofty goals when it is planning more roadways that will further divide and segment our communities, increase maintenance costs and Vehicle Miles Traveled, and remove valuable land from possible residential, retail or industrial development?	Y	The map shows future ROW - it does not dictate design, which could be a bike/pedestrian way as suggested. Design will be done through future study. Some language change is appropriate to ensure clarity.	Change title of Map T-14 to " <u>Potential Future Right-of-Way Connections.</u> " Change labels to " <u>Ayd Mill Corridor,</u> " " <u>Kittson Corridor,</u> " and " <u>Pierce Butler Corridor.</u> "	Agree. In addition, add a note to Map T-14 that says: <u>Mode type(s) and right-of-way design will be determined through future study.</u>
1058	Peter Berglund	Transportation	In support of 2040 Comp Plan Transportation Goal No. 4 to shift away from single-occupant vehicles: (Limit parking and you limit cars) If new development brings more housing but doesn't limit the number of new cars, we're going to have more serious traffic congestion. As I understand the city's policies, a new apartment building must provide a minimum of off-street parking spaces. While increased density is good for mass transit, if more density brings more cars, the buses won't be able to function on streets choked with cars. Some say put the new multifamily housing at major intersections to better connect with transit. However, new apartment buildings may result in the same number of cars regardless of their location.	Y	It is not appropriate to remove parking minimums as part of the 2040 Comprehensive Plan work. However, PED staff are currently working on a city-wide parking study and will add the elimination of parking minimums to the study.	Edit Policy LU-13: Change "minimums" to "overall." Add City-wide Policy LU-XX. <u>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.</u>	Agree

1060	Peter Berglund	Transportation	Senior citizens, college students and many young adults are happy to live without cars, so there should be a market for such housing. We've been told at a meeting on the Ford site that it can cost \$10,000 or more for each parking stall within a multifamily apartment building. If the developers can reduce the number of parking stalls, these savings could be passed on to the new tenants.	Y	Comment acknowledged	Edit Policy LU-13: Change "minimums" to " <u>overall.</u> " Add City-wide Policy LU-XX. <u>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.</u>	Agree
1061	Payne-Phalen Community Council	Transportation	b. Economic growth and population growth should most definitely be focused around transit. But the transit lines that currently exists in many parts of St. Paul, parts of District 5 among them, does not in all cases serve the needs of the populations that are most transit-dependent. Ideally transit service would be provided to the places where residents are most in need (dependency) and the places with the most capacity (potential for economic growth) rather than just where service has historically been offered by Metro Transit. In other words, there are large swaths of the population (particularly in ACPs) that are not well-served by existing transit lines. That being the case, these populations are in danger of losing out on economic growth if "transit" is not more precisely spelled out. Calling out the inherent economic need for providing reliable, equitable transit service to such communities would be hugely beneficial in helping to raise those populations out of poverty.	Y	Equity is a priority per Policy T-1. Could also update the future transit map to add more transitways with equity benefits, including red arrows on Maryland in D5 and on E 7th Street just south of D5.	Revise Map T-8 Planned/Potential Transitways: o The Marshall/Selby proposed transitway red arrow should not go up to University. It should be an arrow from Marshall/Snelling to downtown (or vice versa), that reads as an extension of the planned transitway on Lake/Marshall. o Extend Red Rock's red arrow south along 61 to City border. o Add an east-west red arrow on Maryland Ave between Como/Phalen. o Add a north-south red arrow on White Bear Ave between I-94 and Larpenteur. o Add a red arrow on E 7th.between downtown and Arcade. o Add an east-west red arrow on Randolph between W 7th and Snelling.	Agree

1065	Payne-Phalen Community Council	Transportation	14. Page 36, Transportation: Not all of the city's current transit lines are well-placed to serve transit-dependent communities. An increased investment in service to transit-dependent communities so that transit investments are more likely to service the populations who actually need it. See comments above.	Y	General concept of this comment has been fleshed out by an inter-departmental work team focused on Arterial BRT, but encompassing all potential transitway improvements.	Revise Map T-8 so that: 1. The Marshall/Selby proposed transitway red arrow should not go up to University. It should be an arrow from Marshall/Snelling to downtown (or vice-versa) that reads as an extension of the planned transitway on Lake/Marshall. 2. Extend Red Rock's red arrow south along 61 to city border. 3. Add an east-west red arrow on Maryland between Como/Phalen. 4. Add a north-south red arrow on White Bear between I-94 and Larpenteur. 5. Add a red arrow on E 7th between downtown and Arcade. 6. Add an east-west red arrow on Randolph between W 7th and Snelling.	Agree
1071	Payne-Phalen Community Council	Transportation	24. Page 55: Policy T-1: Industrial Parks and Business Parks (i.e. Phalen Corridor, West Side Flats, and Energy Park) should be included as a group or a type because these are key job centers too – especially for residents that are not necessarily working in the professional sector of the economy. (see related comments in the Land Use section above).	Y	We currently mention downtown in a "such as" clause. Business/industrial parks could easily be added to the "such as" statement, as could 3M and U of M. No meaning is lost by deleting "downtown," and this change avoids loading up a very word-dense policy with even more words. This change - removing the downtown emphasis - is also appropriate given E Metro Strong's study that suggests that a less radial/spoke transit system may be the future.	Revise Policy T-1: "...connection of residents to job centers such as downtown . Priorities will..."	Agree
1077	Payne-Phalen Community Council	Transportation	b. On a smaller note, the legibility of the map might be improved by making the highest concentrations red (a hot color that pops out) and the lowest level a cool color (like blue or green) that recedes. Either way, the heat map concept is the way to go. Well done!	Y	OK	Change colors on Map T-5 for legibility.	Agree
1083	Bill Dermody	Transportation	Delete sidebar on p56. Re-use photo if possible.	Y	Recent research, released by some of the same original researchers, reverses the previous understanding that millennials lack cars more than previous generations. A correction or deletion is required. This takes the main punch out of the sidebar.	Delete sidebar on p56. Re-use photo if possible.	Agree

1084	Bill Dermody	Transportation	Update ped crash data for p55 sidebar.	Y	Hopefully, 2018 data will be available soon (only available to Oct 2018). 2017 is still an improvement over the 2016 data currently there.	Revise sidebar on p55: "...In Saint Paul in 2016 <u>2017</u> , there were 314 <u>305</u> vehicular crashes involving pedestrians and bicyclists alone, including 4 <u>5</u> fatalities and 242 <u>240</u> injuries (163 <u>161</u> requiring hospital attention).		Agree
1085	Bill Dermody	Transportation	There are two policies labeled T-34.	Y		Renumber Transportation policies to avoid repetitions.	58	Agree
1086	Bill Dermody	Transportation	Staff realized that the Kittson line is too long on Map T-14.	Y	It was a carryover from the 2030 Comp Plan, which was completed prior to the 52/I-94 interchange project that clarified the likely Kittson scope.	Revise Map T-14 so that the Kittson Corridor extends only from E 7th Street to Lafayette.		Agree
1087	Bill Dermody	Transportation	Staff realized that the Street Design Manual refers to the truck routes map in the Comp Plan, which is not in the current draft.	Y	The map should be included to allow continued utility of the SDM for truck design. Adding to the Comp Plan is considerably easier than creating a workaround within the SDM.	Add latest truck routes from Public Works to Map T-15. See Figure T-1 from 2030 Comp Plan for potential formatting.		Agree
1088	Bill Dermody	Transportation	Staff recognized that Map T-14 (Future ROW) has no bike/pedestrian/transit priorities. This somewhat ties into comments above about how Ayd Mill extension should not have cars.	Y	The various transitways' ROW acquisitions are looking to be minor - no new corridor is being created. Also, there are various minor bike/pedestrian connections needed that clearly are not equivalent to the road version of "arterials." These connections are more appropriate for area plans and modal plans. However, the one bike/transit ROW that could be considered to rise to the Comp Plan level is the Ford Spur.	Add Ford Spur to Map T-14.		Agree

1089	Bill Dermody	Transportation	As Map P-3 was being updated based on public comment, it became apparent to staff that parallel updates would be needed to Map T-4.	Y	Map T-4 should be the RBTN map, and Map P-3 should be the Trails map. There will be significant overlap in geography, but with two different subjects and purposes.	For Map T-4: - Please change the label "Proposed Regional Trail Search Corridor" to " <u>Proposed Regional Bicycle Transportation Network (RBTN) Search Corridor</u> ", and change its symbol from hatched red to hatched blue. - Add the trail corridor Mike requested for P-3 to this map, but as a "Proposed Regional Bicycle Transportation Network (RBTN) Search Corridor", giving Map T-4 a total of two such corridors.	Agree
1091	Tom Dimond	Water	Adopt a no net loss of wetland policy in Saint Paul. We have lost much of our wetland. Wetland lost in Saint Paul should be mitigate in Saint Paul. Wetland lost in the National Park should be replaced in the National Park.	Y	Staff have discussed this idea previously. However, there are practical difficulties to replacing wetlands in Saint Paul, namely a lack of suitable locations and publicly-owned land where wetlands can be recreated.	Add a short-term item to the Implementation Chapter: <u>Conduct a study to explore the feasibility of a "no net loss" of wetlands policy.</u>	Agree
1105	Saint Anthony Park Community Council (SAP)	Water	Policy WR-8 deals only with gains and losses of ground water. The legacy and extent of industrial contamination in our District is evident in the map on p.94 of the Appendix to the City of Saint Paul's 2017 Stormwater Permit Annual Report. MPCA has identified sources of perchloroethylene and trichloroethylene in the soil and ground water. These compounds move with ground water and vapors can enter buildings, similar to radon. A detailed map of ground water elevations and flow directions is needed to evaluate risk to public health in nearby residences and businesses. It also is possible that the shallow, perched ground water body in this area may impact water in the storm sewer via I&I. This industrial area, and potentially others in the City, should be targeted for investigation with a new Priority under Goal 1 or 3.	Y	Policy WR-8 addresses groundwater supply. However, groundwater quality is also an important issue, and in the context of the comment is related to brownfield issues. Re-establishment of the City's Brownfields Working Group should be an identified action item in the Implementation Chapter.	Add a short-term item to Figure I-5: <u>Re-establish the City's inter-departmental Brownfields Working Group to focuys on groundwater quality.</u>	Agree
1108	Saint Anthony Park Community Council (SAP)	Water	In the first paragraph in the Inflow and Infiltration sidebar, the word "plans" in the phrase "...overload treatment plans and cause bypass events..." seems to be missing a "t".	Y	Comment acknowledged.	Change "plans" to "plants."	Agree
1113	Payne-Phalen Community Council	Water	We think it may also be important to mention equity specifically as it relates to various aspects of water resources management (resiliency/flood management, green infrastructure, surface water quality).	Y	OK	Add a new Policy WR-XX under Goal 3: <u>Apply an equity lens to policy and funding decisions relating to surface water quality and flooding/climate resiliency.</u>	Agree

1119	Payne-Phalen Community Council	Water	45. Page 182: Policies WR-12 and WR-16 seem closely related from a both practical sense as well as a fiscal prioritization. Additional details and information (from allied documents) would be helpful to include herein. We recommend that a map would be created that lays out the “opportunity” sites and projects across the city; something akin to Map LU-3 in the Land Use Chapter that defines “Opportunity Sites.” When it comes to the very practical business of funding actual improvement projects it will be critical to be able to assess the entire constellation needs citywide against the merits and costs of particular projects as they are programmed.	Y	WR-12 refers to system maintenance and upgrade priorities already identified by Saint Paul Regional Water Services. While in general there is a strong connection between surface and drinking water quality, the connection is much less direct within Saint Paul, where the drinking water is sourced outside of Saint Paul. As such, it is not clear what value such a map overlaying identified distribution network upgrades with surface water quality would bring. However, in regard to WR-16, a map of known surface water impairments could be useful in identifying and tracking needs.	Include a map of known surface water impairments (303(d)/305(b)) in Saint Paul in the WR Chapter.	Agree
1121	Payne-Phalen Community Council	Water	46. Page 183: The sidebar entitled “Water is All Around Us” is great! From a format/legibility perspective, it should be located at the beginning of the chapter since it is a better overview that will help the public understand the need for and purpose of having a comprehensive water management strategy. The relevance and understanding of the two sidebars and three principals that precede this (SSGI, BMP, and MIDS) will be better understood if the context information offered in “Water is All Around Us” comes first in the sequence.	Y	Agree.	Move sidebar from p. 183 to p. 181.	Agree
1130	Payne-Phalen Community Council	Water	52. Page 189, map WR-3: Ditto the general public education/engagement comments above for MapWR-3. In addition: On the legend: a. BMPS should be spelled out. b. Outfalls need to be explained. What are they? c. Watershed boundaries are too light to be readable. d. The color for Green Infrastructure BMPs is too close to the color of storm sewer pipes for their location to be read optimally (i.e. Is that a GI-BMP at Payne and Minnehaha?) e. Wouldn't it be great if SPPS teachers, parents or community ed leaders could educate children about stormwater run-off by asking them to locate their house, the closest storm drain and chart the path out to the nearest surface water?	Y	The map will be amended for greater clarity.	Revise Map WR-3 to address a.-d. For e., bring to the City's Water Resources Working Group to discuss how Saint Paul Public Schools can be involved in stormwater education.	Agree
1131	Payne-Phalen Community Council	Water	53. Page 190, Local Surface Water Management Plan: Two thirds of the page is empty and calling out for a little more information for those who may never go to the trouble of looking up the actual appendix document.	Y	OK	Add text to p. 190 that provides more information on the content of the Local Surface Water Management Plan.	Agree



CITY OF SAINT PAUL
Melvin Carter, Mayor

25 West Fourth Street
Saint Paul, MN 55102

Telephone: 651-266-6626
Facsimile: 651-228-3341

Date: March 6, 2019
To: Saint Paul Parks and Recreation Commission
From: Mike Richardson, Planning and Economic Development (PED) Staff
Subject: Park Zoning District in 2040 Comprehensive Plan

BACKGROUND

The City of Saint Paul is in the process of updating its Comprehensive Plan. Among other city-wide topics such as housing and land use, a chapter is dedicated to Parks, Recreation, and Open Space (“Parks Chapter”). Public comment was received on a draft and is being considered, along with staff responses, at the Comprehensive and Neighborhood Planning Committee (CNPC) of the Planning Commission. Among those comments were several that addressed the idea of a park zoning district, as described in the current *2030 Comprehensive Plan*:

“ **2.1 Review and revise zoning of parkland by adopting a new park zoning district.**

The intention of the new zoning district is to reinforce the no-net-loss policy already required by the City Charter and to make Parks and Recreation ownership more transparent and accessible to planners, developers, and residents. The new zoning district would apply only to Parks and Recreation properties and is not intended to change the regulation of uses in parks or transfer responsibility for Park and Recreation land-use choices from the Parks Commission to the Zoning Committee or Planning Commission.”

Consideration of a park zoning district began much earlier than the adoption of the *2030 Comprehensive Plan*. On May 15, 2002, City Council adopted resolution 02-303 that requested that the Department of Planning and Economic Development (PED) incorporate a new district for civic and open space in the proposed restructuring of the Zoning Code. The ordinance adopted by the City Council in 2004 to restructure the Zoning Code included an amendment to Sec. 60.301 to include the CO Civic and Open Space District and reserve Article VI. Sec. 66.600 in *Chapter 66, Zoning District Uses, Density, and Dimensional Standards* for the text of the Civic and Open Space District. Two park districts (CO – Civic and Open Space, and CV – Conservancy District) were created in Sec. 60.301(e) and exist today as placeholders but were not developed further. Article VI. Sec. 66.600 of the Zoning Code remains reserved.

The Planning Commission, on February 7, 2014 adopted Resolution 14-11 (Attachment 1) initiating a zoning study for uses and standards for a park and open space-related zoning district. That study remains open.

DISCUSSION

Although the zoning study has not been completed, PED staff met with staff from the Parks & Recreation Department, Real Estate and park advocates in 2013 and 2014 to discuss and analyze relevant goals and issues. Some of the significant insights gained from that work were:

1. The language of the *2030 Comprehensive Plan* Policy 2.1 predetermines the outcome of the study by saying “revise zoning of parkland by adopting a new park zoning district” and creates constraints (intent to reinforce no-net-loss, only apply to Parks & Recreation-owned properties, would not change regulation of uses in parks, would not transfer land use choice from the Parks Commission to the Planning Commission or one of its committees) that make it difficult to evaluate all potential solutions, some of which may result in a better outcome for the public.
2. Application of a new zoning district to parcels would be challenging because the *2030 Comprehensive Plan* Policy 2.1 links the zoning district to “reinforcement” of the City’s “no net loss” policy pertaining to parkland diversion. The “no net loss” analysis is currently done on a case-by-case basis, but to establish an accurate baseline of park land that was acquired “for park purposes” per the *City Charter*, this history and legal analysis would have to be done for all City-owned parcels. A significant commitment of resources from Parks and Recreation and Real Estate would be necessary to determine the intention behind the acquisition of all City-owned parcels and to research the legal access agreements that apply.

The zoning study initiated by the Planning Commission and informed by Council’s intent to develop a parks district remains unfinished and should be completed. It is a very complicated subject, and there are pros and cons to rezoning to a new district, which should be made clear to policymakers. Park zoning districts would be more easily evaluated without the constraints present in Policy 2.1 of the *2030 Comprehensive Plan*. The decision to be made is to either adopt an amendment to the Zoning Code that applies new park zoning districts, or to abandon the idea and amend the Zoning Code to eliminate the placeholders created in 2004.

STAFF RECOMMENDATION

1. Create a new implementation item in the *2040 Comprehensive Plan* that reads:

“Complete the Parks, Civic and Open Space Zoning Study initiated by Planning Commission Resolution 14-11, removing the reference to Parks Policy 2.1 in the *2030 Comprehensive Plan*.”

and set the Timeline as “Short-Term”.

[Note: the *2030 Comprehensive Plan* will be replaced with the *2040 Comprehensive Plan* when it is adopted. Staff will consult with the City Attorney’s Office to confirm the correct process necessary to conduct the study with this change.]

Attachment:

1. Planning Commission Resolution 14-11

Attachment 1: Planning Commission Resolution 14-11

city of saint paul
planning commission resolution
file number 14-11
date February 7, 2014

Parks, Civic and Open Space Zoning Study Initiation

WHEREAS, on May 15, 2002, the City Council adopted resolution #02-303 requesting that the Department of Planning and Economic Development incorporate a new district for civic and open space in the proposed restructuring of the Zoning Code; and

WHEREAS, in 2004, the City Council adopted an ordinance amending the Zoning Code to include the CO Civic and Open Space district in Sec. 60.301 *Zoning districts established* and reserved Article VI. 66.600 in *Chapter 66, Zoning District Uses, Density and Dimensional Standards*, for the text of the Civic and Open Space District, but the text has not yet been added; and

WHEREAS, on February 4, 2010, the City Council adopted a new Comprehensive Plan for the City, including a Parks and Recreation Plan element that reiterated the call for a new zoning district for parks. Policy 2.1 states "review and revise zoning of parkland by adopting a new zoning district;" and

WHEREAS, § 61.801, *Changes and amendments*, requires periodic review and reevaluation of the Zoning Code, and provides for Planning Commission initiation of Zoning Code amendments.

NOW, THEREFORE, BE IT RESOLVED, that the Planning Commission hereby initiates a study for development of text pertaining to uses and development standards for a parks and open space-related zoning district and the rezoning of appropriate land to the new district.

moved by Reveal
seconded by _____
in favor Unanimous
against _____

Recommended Narrative Revisions in Parks Chapter of 2040 Comprehensive Plan

2/22/19

(Response to PC hearing comments and a supplement to the comment tracking spreadsheet)

Introduction

The Parks, Recreation and Open Space Chapter sets broad policy to create an equitable, safe, connected and sustainable park system for all users. ~~The Saint Paul park system includes parks, parkways, recreation centers, public spaces and trails.~~ The Saint Paul Parks and Recreation system consistently ranks as one of the best in the nation, with more than 179 City-managed parks and open spaces, 25 recreation centers, more than 100 miles of trails, aquatic facilities, municipal golf courses, and the Como Park Zoo and Conservatory. It comprises a large, diverse and vibrant network of people, spaces and facilities that is recognized by Saint Paul residents as one of the city's great shared assets. Together, the system components form a vital connective tissue, facilitating a sense of community, and fostering stewardship of nature and community spaces.

Park facilities and programs improve the quality of life for all residents and visitors. ~~They~~ Beautiful landscapes and facilities for recreation foster public health by ~~providing opportunities for physical fitness, and~~ promoting mental and social well-being, and providing opportunities for physical fitness. ~~Parks and Community Recreation centers~~ and parks serve an important role for the city's youth by providing safe and healthy places and activities. Parks connect us to the Mississippi River and lakes by providing access and spaces to enjoy them. Great public spaces are an important component of sustainable economic development, drawing and retaining residents, increasing nearby property values and attracting businesses.

Changes in demographics, technology and development are constant. ~~It will be necessary to periodically evaluate how well~~ The City will need to be vigilant to ensure that the parks system responds to is meeting changing needs, challenges and opportunities, and that a person's access to the benefits provided by our world-class parks is not pre-determined by race, ethnicity, age, income or ability.

Perceptions of Park Sidebar Revisions

Parks mean different things to different people, and those differences are often linked to race and culture (Johnson & Bowker, 1999). For example, white people tend to favor a natural and less managed environment, while African Americans and Latin Americans prefer a more structured park landscape (Kaplan & Talbot, 1988; Ozguner, 2011).

Parks staff have found that some recent immigrants perceive the natural areas of our parks as unwelcoming. It is for this reason that the phrase “open space” is included in the title of this chapter—to signal that the natural, less formal areas are also part of the park system and welcome to all.

The perception of barriers to parks also differs by race and culture. A report released by the Metropolitan Council in 2014 found the following differences in perceived barriers to park visitation by focus group:

As the demographics of the city change, it is important to understand and respond to changing perceptions so that the system is welcoming and accessible to all.

The term “park” generally conjures up the image of a manicured landscape with amenities like lawns, picnic benches, formal trails, perennial gardens, etc. These tend to be the most heavily-used public places. However, natural and naturalized areas are also significant components of our system of public recreational space in Saint Paul. Such landscapes provide important opportunities to experience nature, understand the natural world around us, and promote the urgency to care for it. Research shows that white people are significantly more likely to explore natural and informal parts of our park system than African Americans, African Immigrants, Asian Americans, Asian immigrants and Hispanic/Latino/Latina people (Kaplan & Talbot, 1988; Ozguner, 2011). As a City, we have a responsibility to ensure that everyone has access to and feels welcome in all of our parks, recreation centers and open space areas.

We have chosen to add the phrase “Open Space” to the chapter title to promote an understanding that the entire spectrum of park types is open to all members of the Saint Paul community. As the stewards of our open space system, the City needs to continually consider ways to ensure that everyone feels welcome, and everyone has an opportunity to explore the greater natural environment for improved collective well-being.

New Sidebar #1 – No Net Loss Policy

No Net Loss Policy

Parkland in Saint Paul is protected for future park users through the City’s “no net loss” policy contained in the City Charter, which reads in part, “Lands which may have been heretofore acquired by any means or which may hereafter be acquired by any means for park purposes shall not be diverted to other uses or disposed of by the city...” Any diversion or disposal is reviewed by both the Saint Paul Parks and Recreation Commission and the City Council. When the City Council decides that diversion or disposal of parkland is in the public interest, additional parklands must be acquired to replace the lands that are diverted, preferably within the same District Council area and of a similar nature to the diverted parkland. (City Charter Section 13.01.1)

New Sidebar#2 – *Great River Passage Master Plan*

In 2013, the City of Saint Paul adopted the *Great River Passage Master Plan* – a comprehensive framework for orienting the city toward the river, connecting 3,500 acres of parks along the Saint Paul riverfront to one another and to the city’s neighborhoods, and balancing environmental preservation with economic development. The Saint Paul Parks and Recreation Department is now implementing the Great River Passage Initiative – a bold City-community partnership that will steward and tap into the potential of the 26 miles of riverfront in Saint Paul.

The recently-created Great River Passage Conservancy, an independent 501(c)3 non-profit, advocates for projects and guides private fundraising efforts for projects that create places and activities to connect Saint Paul to the Mississippi River.

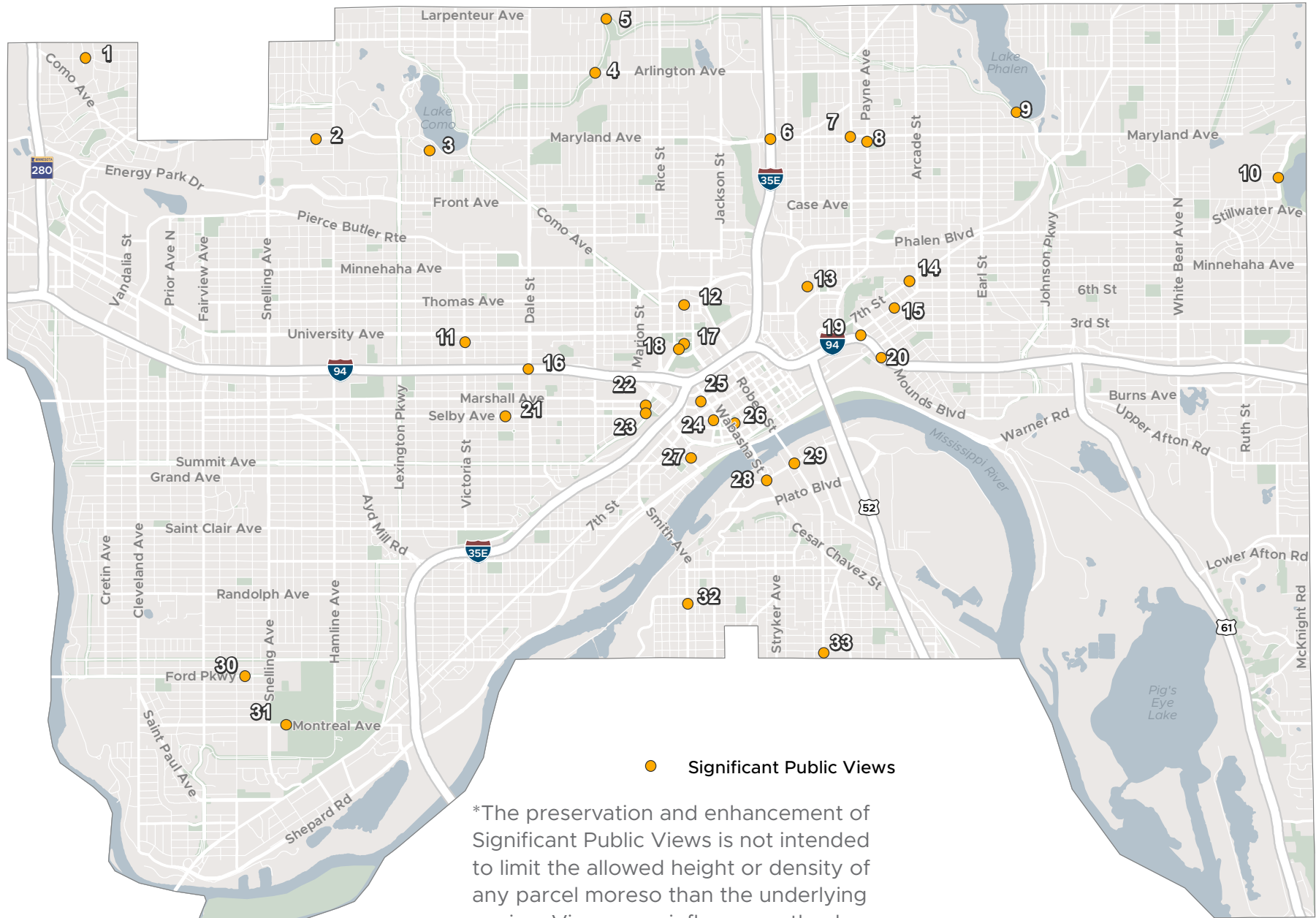
[Add photo]

[Adapted from the City’s GRPMP website]

Description of RTSC on Page 103

Regional trail search corridors are linear areas that are proposed to be the location of regional trails in the future. A regional trail must have an alignment defined in a Metropolitan Council-approved master plan and meet regional requirements established by the Metropolitan Council. Once a regional trail has an approved master plan, it becomes eligible for regional funding for acquisition and development. There is not an established timeframe for when regional trail search corridors will be master planned or developed. A public engagement process will be conducted during any future master planning process to identify trail alignments.

Map LU-4: Significant Public Views



● Significant Public Views

*The preservation and enhancement of Significant Public Views is not intended to limit the allowed height or density of any parcel moreso than the underlying zoning. Views may influence setbacks and building form to frame, enhance, or preserve views.

0 0.5 1 2 Miles
Source: City of Saint Paul; Minnesota DNR



View 1: Hendon Avenue West



From Hendon Avenue, one of the highest points in St. Anthony Park, are views of the downtown Minneapolis skyline.

View 2: Como Avenue West



Looking west on Como Avenue west of Como Park provides a view of the downtown Minneapolis skyline.

View 3: Nagasaki Road at Lake Como



From Nagasaki Road there are several vistas of Lake Como and its far shore.

View 4: Wheelock Parkway Ridge



This section of Wheelock is on a ridge providing views of the city to the south. However, the wooded area is overgrown blocking views. It could use some selective trimming and removal of invasive species to open the landscape to people using the Grand Round.

View 5: Horseshoe Bend



Horseshoe Bend along Wheelock Parkway is a remnant of a landform marking the southern terminus of glaciers from the last ice age. This high point provides outstanding views to the east and south from Wheelock and the park at the top of the hill.

View 6: 35E South to Downtown



Coming into downtown from the north on 35E there is a prolonged view of the downtown skyline.

View 7: Maryland Avenue West



There is a wonderful long westward view of the Minneapolis skyline rising over the neighborhood west of the intersection of Payne Avenue and Maryland Avenue.

View 8: Payne Avenue South to River Valley



South of the intersection of Payne Avenue and Maryland Avenue there is a broad southward sweeping view of the Mississippi River Valley and the bluffs of the West Side. This view is very dramatic, particularly at certain times of the day and year. This change in topography and the view that comes with it really enhances the very special sense of place along a several-block stretch of Payne Avenue. This is a dramatic view for a city where so many places are characterized by their flatness in topography.

View 9: Wheelock Parkway at Lake Phalen



On Johnson Parkway, facing north between Phalen Boulevard and Wheelock Parkway East/East Lakeshore Drive there is a very wide and wonderful view of Lake Phalen. This view along this stretch of parkway is one of the more dramatic ones in the city.

View 10: Beaver Lake Park



This location from Edgewater Boulevard provides views overlooking Beaver Lake Park and the lake behind it.

View 11: Victoria Street Station



The Saint Paul Fellowship Church is a handsome local landmark, immediately visible from the proposed station location. It was identified in the Victoria Station Area Plan as a key vista from the LRT station. New development at the NW corner of Victoria and University should be set back to protect and enhance views of the church steeple.

View 12: North Capitol Street



A rarer Minnesota Capitol view from the north can be seen from North Capitol Street. Views from this street have been diminished over time from right of way vacations. This view is with the Capitol Area Architectural and Planning Board area.

View 13: Rivoli Street



The southern end of Rivoli Street provides one of the absolute best, yet least known, picture postcard views of the Saint Paul skyline. Ongoing work to define an overlook and/or green space here could ensure that this remarkably breathtaking view is preserved and available to the public for generations into the future.

View 14: East 7th Street



Longer views southeast to the downtown Saint Paul skyline are seen from the top of the hill on East 7th Street west of Margaret Street.

View 15: East 6th Street



Looking east on East 6th Street there is a great view of the façade of Sacred Heart Church where the street bends.

View 16: I-94 West to Downtown



Coming into downtown from the west on I-94 there is a view of the downtown skyline.

View 17: South from Capitol



This view was planned in 1903 by Cass Gilbert to be one of the main axial views from the Capitol (along with John Ireland Boulevard and Cedar Street). It is part of the longer view from Smith Avenue (across the High Bridge) to the Capitol, and was initially planned to terminate at Cleveland Circle. Unfortunately, in the 1950s, the Veterans Service Building was built north of what is now I-94, essentially obliterating the view beyond it.

View 18: John Ireland Boulevard to Cathedral



This view was planned in 1903 by Cass Gilbert to be one of the main axial views from the Capitol (along with the corridor noted in View 17 and Cedar Street). This view is intact today and unobstructed, now framed by the Transportation Building.

View 19: I-94 West to Downtown



Coming westward on I-94 around the bend between Dayton's Bluff and Mounds Park there is a view of Lafayette Bridge, the ballpark in Lowertown and the downtown skyline. This is the first view of a major skyline in Minnesota for those travelling west along that interstate.

View 20: Mounds Boulevard to Downtown



Mounds Boulevard provides beautiful day and night views of the downtown skyline as it sits in the Mississippi River Valley year-round. The Mounds Station Area Plan calls for wider pedestrian and bike facilities to allow people to properly enjoy this unparalleled view of the city.

View 21: Selby Avenue to Downtown



Eastward views from Selby Avenue east of Chatsworth Street frame the tops of some downtown buildings, particularly the First Bank Building and its iconic illuminated, flashing "1." For this reason, night views can be more impressive than the daytime as well as those during the winter months when the trees are bare.

View 22: John Ireland to Capitol



This view was planned in 1903 by Cass Gilbert to be one of the main axial views from the Capitol (along with the corridor noted in View 17 and Cedar Street). This view is intact today and unobstructed, now framed by the Transportation Building and Minnesota Historical Society.

View 23: Cathedral to Downtown



From the Cathedral steps, the skyline is visible over open space on top of the historic Selby streetcar tunnel. Retaining this area as open space is critical to maintaining the view, and understanding the relationship between downtown and the Selby terrace.

View 24: West 6th to Cathedral



This view up 6th Street is also identified in the Seven Corners Gateway Development Evaluation Tool as an important view to be preserved when the Cleveland Circle (Seven Corners Gateway) site is developed. The Seven Corners Gateway Development Evaluation Tool view corridor starts on the other side of the skyway, closer to W. 7th Street, but the impact of any development would essentially be the same. The skyway that originally connected the two St. Paul Companies office buildings was designed specifically to allow for views through it to the Cathedral. Because of the stature and lighting of the Cathedral, preservation of this view at night is also important.

View 25: West Exchange Street



This view looking east from Wabasha to Cedar along Exchange Street terminates at Central Presbyterian Church, listed on the National Register of Historic Places and designated as a local heritage preservation site. Also contributing to the importance of the view are the scale of Exchange Street, the framing of the view by buildings in the block between Wabasha and Cedar streets, and the character of the street as defined by the lush tree canopy on both sides of Exchange Street.

View 26: Cedar Avenue to Capitol



This view is the primary axial view established by Cass Gilbert in the 1880s in his plans for the State Capitol and Capitol Mall. Skyways should not be allowed to obstruct this view, and any new development along Cedar Street should be designed to frame the view. Land use, and building type, height and setback between Exchange Street and the Capitol are regulated by the Capitol Area Architectural and Planning Board. Because of the stature and lighting of the Capitol, preservation of this view at night is also important.

View 27: Chestnut Avenue to Cathedral



Chestnut Avenue is a major gateway into downtown and W. 7th Street neighborhood from Shepard Road and the Mississippi River. Future development on the United/Children's Hospital campus at the base of the bluff at Smith Avenue should be designed to frame and/or enhance this view. Because of the stature and lighting of the Cathedral, preservation of this view at night is also important.

View 28: Wabasha Avenue



The view as one comes over the Wabasha Street bridge is of the downtown skyline and Mississippi River. The west side of Wabasha Street north of Fillmore Street is very likely to be developed in the next 20 years, so framing this view with the proper scale and height of buildings will be critical to maintaining and framing the view.

View 29: Robert Street



The view as one comes over the Robert Street bridge is of the downtown skyline and Mississippi River. The east side of Robert Street north of Fillmore Street is very likely to be developed in the next 20 years, so framing this view with the proper scale and height of buildings will be critical to maintain and framing the view.

View 30: Ford Parkway to Water Tower



As one climbs the hill moving westward on Ford Parkway the Water Tower comes into view. This is an important community landmark in one of the high points of the city. A historic building, it was designed by Cap Wigington, the first African-American municipal architect in the country.

View 31: Montreal Avenue to River Valley



Eastward views from Montreal Avenue provide glimpses of the river valley below in the long view.

View 32: Smith Avenue to Capitol



This is the long view identified by Cass Gilbert in his 1880s plans for the Capitol building. It is also noted for preservation in the Seven Corners Gateway Development Evaluation Tool. With so much distance between the view point and the Capitol, it is unlikely that anything built along the corridor would obstruct this critical Capitol view. Because of the stature and lighting of the Capitol, preservation of this view at night is also important.

View 33: Robert Street to River Valley



Northward views from north of Annapolis Street along Robert Street glimpses of the river valley below in the long view.