Saint Paul Planning Commission
City Hall Conference Center
15 Kellogg Boulevard West

Minutes June 2, 2017

A meeting of the Planning Commission of the City of Saint Paul was held Friday, June 2, 2016, at 8:30 a.m. in the Conference Center of City Hall.


Commissioners Absent: Mr. Lindeke

*Excused

Also Present: Donna Drummond, Planning Director; Kady Dadlez, Allan Torstenson, Merritt Clapp-Smith, Mollie Scozzari, Savannah Simms, Alicia Valenti, Sese Spiyee, and Sonja Butler, Department of Planning and Economic Development staff.

I. Swearing in a new commissioner Cedrick Baker.

New Planning Commission member Cedrick Baker was sworn in by Shari Moore, City Clerk.

II. Approval of minutes May 19, 2016.

Chair Reveal announced that the minutes are not available at this time. However they will be ready for approval at the next Planning Commission meeting.

III. Chair’s Announcements

Chair Reveal had no announcements.

IV. Planning Director’s Announcements

Donna Drummond, Planning Director, announced that there will be another commissioner joining the Planning Commission, Chong Lee. She is currently traveling in Tiland and will be sworn in at the June 30th meeting. Also, the next Planning Commission meeting on June 16th will be held at the State Capitol, which is something that the Steering Committee has talked about. Wayne Waslaski from the Department of Administration gave a presentation last year about the Capitol renovations and he invited the Planning Commission to hold a meeting at the Capitol, so that will happen at the next meeting. There are upcoming workshops for the Rice-Larpenteur area planning coming up on June 14th and 21st. Commissioner Edgerton is the Planning Commissions representative for the area planning work. This is a joint planning process with the cities of Saint Paul, Roseville and Maplewood.
V. **PUBLIC HEARING**: Short Term Rental Study & Zoning Amendments – Item from the Neighborhood Planning Committee. *(Kady Dadlez, 651/266-6619)*

Chair Reveal announced that the Saint Paul Planning Commission was holding a public hearing on the Short Term Rental Study and Zoning Amendments. Notice of the public hearing was published in the Legal Ledger on May 4, 2017, and was mailed to the citywide Early Notification System list and other interested parties.

Kady Dadlez, PED staff, gave a power point presentation which can be seen on the web page at: [http://www.stpaul.gov/planningcommission](http://www.stpaul.gov/planningcommission)

Commissioner Reich referenced the slide stating that one short term rental dwelling unit would be permitted per lot in one and two-family zoning districts and two units would be permitted in a duplex if owner is present. Ms. Dadlez clarified that two short term rental units would be allowed if the duplex owner is *in residence* at the time of stay.

Ms. Dadlez said the intent there is that the owner of the duplex would be in residence, so that they are not renting the entire unit, they are renting a bedroom or two that are available, but they are also living and residing there at the time of the short term rental.

Chair Reveal read the rules of procedure for the public hearing.

The following people spoke.

1. **Kris Ullmer**, 108 S. Cleveland Street, Merrill, WI 54452, Executive Director of the Professional Association of Innkeepers International. Ms. Ullmer is supporting the just and fair regulations for all types of lodging properties. Short Term Rental and the Sharing Economy are simply new terms for the exchange of money for lodging. By inventing these new terms, which do not appear in existing codes, regulations, or statutes, advertisers such as Airbnb and other mega websites con you into thinking this is something new, and agencies/legislators such as yourselves spend hours and months doing studies and debating what to do. Short term rentals are in private homes, just like bed & breakfasts, and are in multi-family buildings, like apartments or hotels. The regulations that have already been debated and established for B&Bs and hotels logically apply to short term rentals. It is your responsibility to protect Saint Paul’s citizens, neighborhoods, guests, and support city services through just and fair regulations. During a work group conference call, we heard directly from Airbnb that they are not in the business of policing short term rentals, and you have correctly concluded it is up to you to regulate and enforce directly with the hosts. Short term rental hosts will say the regulations should not apply to them and they will say that the regulations are too strict and they have a valid point. The 1,000 foot distance between B&B, or the cap on the number of rooms, or the number of guests per room, can be adjusted and must be applied uniformly, fairly, to all lodging options. By ignoring the short term rental business, or giving them a free ride or a significantly reduced fare, will kill the legitimate lodging business that now support the city services; and it is happening all over this country. Ms. Ullmer submitted written testimony as well.

2. **Pam Biladeau**, 96 Virginia Street, Saint Paul 55102. Mrs. Biladeau and her husband own a bed and breakfast and they reside there as well. She strongly urges the Planning Commission not to approve the language as it is being proposed without addressing her concerns. Not
approving the family occupancy definition which would be impossible to regulate. Instead quantify the number of guests and rooms of occupants for each bedroom based on square footage. In addition define the exact number of guests allowed per home and consider parking congestion potential disruption to residential neighborhoods and limit the number of guests per home. Block large investment groups from destabilizing neighborhoods with transient properties, because rezoning residential neighborhoods into business districts is not what her neighbors and herself want. She is very concerned about the impact rezoning residential neighborhoods into business districts would have. And referring to the family occupancy definition, it does not limit the number of guests to a guest room, I am told that there can only be four adults, this is a misnomer, and omission, because what this language really means is in addition to the four adults, it allows their grown children, their grown children and their children. So how can this possibly be regulated and what recourse do neighbors have to complain about increased traffic associated with this type of business lodging. The concern is that there will be no recourse for the residents because the short term rentals will be in compliance and there are very few restrictions and the city will not be able to do anything because they are in compliance. She asks the city to please consider using the current licensing laws, permitted use and zoning with the exception of allowing an option to not serve breakfasts. Mrs. Biladeau submitted written comments.

3. Cory Biladeau, 96 Virginia Street, Saint Paul 55102. Mr. Biladeau thanked the Planning Commission for allowing his wife and himself to speak. He is here today to address concerns about the proposed short term language. His observation is that the proposed language redefines lodging rentals as residential lodging rather than a business. The justification is that if rooms are being rented in a residential home they are somehow not a business and fall under family definition. He believes the main benefit for proposing this new language rather than tweaking and using current licensing laws is to support large investment groups. The argument he's heard saying short term rentals are new and different is not true and are already covered under current licensing laws for bed and breakfast and hotels. For example: the language is needed for special events like the Super Bowl. This is simply not true, it is already federal law you can do this completely legally. If people want to make a little extra money and only want to rent a single room, the licensing process for a bed and breakfast is relatively easy and a conditional use permit is not required but if hosts want to offer more than that then it is not just a little money it's a business. And the not being able to put up a sign, well they should have to have a sign put up.

4. Sean Doyle, owner of a short term rental for about five years and has had many people stay at his place at 277 Burgess Street, Saint Paul 55117. He is concerned about regulations being prohibitive for him to be able to continue his business; yes it is a business that is how he makes his money. Recourse for neighbors who are concerned about what's going on next door or if there is a party or what not, there is a website. Airbnb.com.neighbors is a place for neighbors to easily lodge their concerns and problems, which Airbnb takes very seriously. A few slight infractions and you are no longer an Airbnb host. He would like to see any of the money that comes from this go to help make some of our neighborhoods safer. He is one of the few people in his neighborhood that calls the Police all the time. There is on average a shooting in his neighborhood once maybe twice a month and this concerns him. His house is 130 years old. It was voted the most mysterious house in Saint Paul; it's an attraction and lots of people come from all over the world and stay at his place.
5. Stacy Johnson, 633 Dayton Avenue, Saint Paul 55104. Ms. Johnson is a vacation rental owner in Saint Paul and has been doing this for about five years. If 50 percent of the total number of units in a multi-unit building are allowed to be short term rental, up to a total of four units, how would that work with a triplex which is has an odd number or units a building with five or seven units? Would it be rounded up or down or does it make more sense to look at number of guests per bedroom or by square footage? So that is something to be clarified and specified in terms of this area of the regulation. For the people who are wondering who are the guests that stay at a vacation rental or Airbnb, from her experience the average age of her guests are couples about 60 years old, they are typically former residents of the neighborhood. The majority fly in - they do not drive cars, so regarding the parking concern there is enough parking. With her triplex if she had rented it conventionally with a husband and wife each driving a vehicle there would be 6 cars, typically there is not more than 2 cars on any given day, so there is less traffic on her street, less parking. They do not party; they are really quite, in bed by 10:00 p.m. Through the revenue generated from short term rentals she is able to improve the property, invest in the property, and then property values go up, because it is worth more and more goes to the city. Ms. Johnson’s neighbors have used her service, if they have a weddings or guests coming in for graduations they call her and are thrilled to have their family member stay three doors down. And we need to embrace this area of tourism that supports the wonderful things we have to offer. Ms. Johnson submitted written comments.

6. Tess Galati, 482 Holly Avenue, Saint Paul 55102. Ms. Galati has lived in her home for 41 years and her home is 140 plus years old. She has been with Airbnb for three years and has had over 150 guests, she gets positive reviews and very proud of that. What Airbnb does for her is allows her to keep working on her house that she still loves. Her neighbor next door is a regular Airbnb host and he loves her house as well, because if he is overbooked people can stay at her house or the neighbors have their relatives stay at her home. Airbnb brings people from all over the world to her doorstep. Ms. Galati submitted written comments.

7. Shannon Fiecke, 401 Sibley Street, Saint Paul 55101. Ms. Fiecke has hosted Airbnb guests and it has made the difference between having a home and being homeless. To her a short term rental is no different than finding a roommate on Craig’s list. It is secure, you get paid. You get to know the people.

8. Chip Michel, 1731 Summit Avenue, Saint Paul 55105. Mr. Michel representing SARPA, which is the Summit Avenue Residential Preservation Association, their mission is to restore the residential flavor of the neighborhoods in Saint Paul. SARPA would like to see what is proposed continue to enforce the current zoning in place for residential use with the current definitions of family. Their major concern is the conditional use permits, and they strongly urge the Heritage Preservation Commission be involved in the approval of the conditional use permits.

9. Amber Van Dyke, 1895 Portland Avenue, Saint Paul 55104. Ms. Van Dyke is one of the first seven in Saint Paul to have a short term rental; she has been in business since 2007. Almost all of her guests are Minnesota families coming back to visit family. She supports the platform collecting taxes and she does not feel that it relieves an owner from not remitting taxes for direct bookings because anytime she can cut out Airbnb’s that is good for her. Ms. Van Dyke would not mind having a sign in front because it makes her less reliable on the website. Something that has not been brought up yet is the certificate of occupancy program
has a tiered system: A-B-C-D properties that have different schedules for fees and different timelines for inspections. She proposed a tiered system for short term rentals as well. The proposed parking requirements are a little too strict, because if she has her four adults staying at her house they’re sharing one car, and it is half a space per adult guest and she would hate to see garages knocked down so that you can squeeze in an extra parking spot.

10. Lance Bondhus, 3628 Nicollet Avenue, Minneapolis 55409. He formed the Minnesota Vacation Rental Alliance; they have 177 members throughout the state that have short term rentals. Mr. Bondhus does not think there is an issue with parking, people don’t rent two cars when you travel with your family or a group you rent one and share. Whereas if two or three people live in a unit long term everyone usually has their own car. Regarding investment companies, he does not see that as being a problem. The 250 homes you see available for short term rental are not funded by a huge investment company. One thing he is concerned about is the wording on duplexes and triplexes. These properties were originally built for commercial use. They were not built for anything other than to rent out. Otherwise, they would be a single family home. The city regulations on property rights regarding some of these things can be a little prohibitive, a duplex was built to be rented out not for one person to live in it and rent it out long term to someone else, so some of that wording should be revised. And you’re allowing people to come and stay in people’s homes and rent it as it is an investment property. The only difference is the length of stay. You’re saying anything over 30 days is fine you can do whatever you want but anything under 30 days is not allowed, he does not understand where just the amount of days makes that big of a difference. Mr. Bondhus submitted written comments

11. Dennis Schneider, 798 Interlachen Draw, Woodbury 55105. Mr. Schneider and his wife are Airbnb hosts; he has a single-family home with an unused downstairs so one day they decided to post it. They have had about 40 or 50 guests from mostly people who are senior couples. There are a couple of issues. The large investment company converting long term housing is a concern, he would be concerned if his neighbor sold his house and split it into 6 rooms to invest. He wants to make sure that you do not go overboard and put too many regulations on people like him.

12. Katherine Gardner, 241 Prescott Street, Saint Paul 55107. Ms. Gardner said when you’re regulating here that you are regulating for the whole city and she can understand the pressures that are on an area like Summit Hill but you also don’t want to make regulations that are going to make it difficult for somebody on the east side to rent out a room and be able to make improvements. On the West side they have this incredible over look of the city and it is very much not taken advantage of, it is under developed and that is the kind of area that could really benefit from having more short term rentals.

13. Shelly Campbell, 227 Stevens Street N., Saint Paul 55107. Ms. Campbell is the owner of a short term rental advertised on Airbnb and VRBO and she has a lot of pride in her neighborhood on the West side, which she believes is highly overlooked. In her neighborhood she goes out and cleans the street, her block is immaculate. When people arrive they don’t even know that there was garbage thrown out and leaves in the gutter, maintenance is huge, she makes sure her house looks good and the house across the street looks good and it starts to ripple. And the neighbors say oh she moved the lawn again lets mow our lawn or let’s clean up or whatever happens to need to be done.
14. Kim Hunter is the owner of a VRBO at 1451 Edmund Avenue, Saint Paul 55104. Ms. Hunter also takes pride in her neighborhood and home. It is eminently reasonable of course that short term rentals should be taxed, but in terms of the competition with the bed and breakfast and so forth it’s just logical that they be taxed. Ms. Hunter has some concerns with the staff report, it is not entirely clear in terms of what best practices or what recommendations are actually being made in terms of how Saint Paul would proceed and things like limitations on the number of licenses, one per household is very reasonable. She read in the Pioneer Press about the concern about parties; how would a party be defined, what is a party for example. Her little rental property is not going to be this hot happening scene for parties but if that were to be part of the ordinance how would it be defined?

15. Angie Toomey, 1658 Blair Avenue, Saint Paul 55104. Ms. Toomey’s property is a 12 month tenant property with a fire certificate of occupancy; she also has short term rentals throughout Minneapolis. She also manages rental properties; short term rentals and long term rentals for people all over the metro area. Saint Paul is the first city to form regulations that involve the community and she would to see some of the language changed as far as the number of units allowed in a multi-unit building being able to be used as a vacation rental. She is a member of the Vacation Rental Alliance Group. Multi-unit buildings already are commercial uses. She has a duplex in Minneapolis both of the units are short term rentals. But sometimes she has someone there for two months in one unit and the next month a few groups there on different weekends. The other unit runs by 3-7 night stays on a regular bases, so by eliminating the number that can be used as non-owner occupied what problem is really being solved by enforcing that requirement of the 50 percent of units allowed to be short term rental? Take a look at the fire certificate of occupancy and maybe add a special conditional use within there that specifies short term rentals and include that if you want to rent for less than 30 days.

Commissioner Thao said to Ms. Toomey that she had mentioned the properties that she manages; Commissioner Thao wanted to know if all those properties that she manages are owned by here or someone else.

Ms. Toomey said that she manages some for herself and some for others.

**MOTION:** Commissioner DeJoy moved to close the public hearing, leave the record open for written testimony until 4:30 p.m. on Monday, June 5, 2017, and to refer the matter back to the Neighborhood Planning Committee for review and recommendation. The motion carried unanimously on a voice vote.

VI. **Zoning Committee**

**SITE PLAN REVIEW** – List of current applications. *(Tia Anderson, 651/266-9086)*

Three items to come before the Site Plan Review Committee on Tuesday, June 6, 2017:

- Five Star Storage – New Commercial Development at 1400 Selby Avenue. Jake Hendricks- Five Star Development  SPR #17-038176

- Parque Castillo – New play area, splash pad, and paths at 149 Cesar Chavez Street. Anne Gardner-St. Paul Parks & Recreation  SPR #17-042901
■ Cherokee Regional Park – Play Area Renovation at 700 Cherokee Heights Blvd. Cheeneng Yang-St. Paul Parks & Recreation SPR #17-038489

NEW BUSINESS

#17-033-549 Jordan Frank-Shannon – Expansion of nonconforming use permit for camper van rental with existing auto repair, and setback variance for additional parking spaces. 2599 7th Street West, NE corner at Wheeler. (Kady Dadlez, 651/266-6619)

Commissioner Mouacheupao noted that conditions were attached to the conditional use permit for auto repair in 1992 requiring installation of an ornamental fence and a tree, asked why these conditions were never enforced, and asked how they will be enforced now.

Commissioner Makarios said the Department of Safety and Inspections is responsible for enforcing the code and conditions imposed on permits, and for whatever reason it was not done in this case. There is a hole in the sidewalk where a tree should be, but no tree. There was some discussion about this by the Zoning Committee. The applicant in this case, who is in the process of buying this property, was specifically asked to put up the fence and plant the tree and said they would do it.

MOTION: Commissioner Makarios moved the Zoning Committee’s recommendation to approve the expansion of legal nonconforming use subject to additional conditions. The motion carried unanimously on a voice vote.

VII. Comprehensive Planning Committee

River Balcony Master Plan – Approve resolution recommending to the Mayor and City Council for adoption. (Lucy Thompson, 651/266-6578)

MOTION: Commissioner Thao moved on behalf of the Comprehensive Planning Committee to recommend approval of the resolution and forward to the Mayor and City Council for adoption. The motion carried unanimously on a voice vote.

Ford Site Zoning and Public Realm Plan – Staff presentation on plan in advance of public hearing for June 30, 2017. (Merritt Clapp-Smith, 651/266-6547, and Jonathan Sage-Martinson, 651/266-6628)

Merritt Clapp-Smith PED staff, gave a power point/video presentation which can be seen on the web page at: http://www.stpaul.gov/planningcommission

Commissioner DeJoy said that this development has to be done in stages, so is the intention that the entire infrastructure would happen first? As for the Plan B layout without the Canadian Pacific (CP) rail property included, is it the same street grid?

Ms. Clapp-Smith said that the street grid change in Plan B is a curve added to Montreal and then small shifts in the lower southwest corner. You need the same amount of space for the stormwater in either plan and in Plan A part of the stormwater runs on the CP property.
Therefore, in Plan B, the stormwater space slides west, requiring a shift in the blocks and street grid to accommodate that on the southern blocks.

Commissioner DeJoy said she appreciates the variety of housing, but she did not hear anything about affordability. There are a lot of different types of housing but she can’t tell whether or not she or her kids could afford to live there.

Ms. Clapp-Smith said that there is a page towards the end of the plan that talks about affordability for the site. The City cannot require affordable housing on this site, because it is privately owned, unless there is public financing invested into the project. If there is public investment through tax increment financing or other City tools, then it will trigger the requirement for affordable housing. In that event, the Ford Plan sets the goals for onsite affordability, which would be 20% of housing units on the site, with 10% of those being affordable at 50% of area median income and the other half being affordable at 60% of area median income.

Commissioner Ochs said that in the video portion of the presentation when it talked about the housing types and described the housing next to the river is appeared to be mansions. He wondered if that could be edited to show similarly low density housing, without the implication of high priced mansions.

Ms. Clapp-Smith said that in the plan they refer to those units as multi-unit homes and not mansions, since they allow 2-6 units.

Chair Reveal said that the question of affordability needs to be grappled with better for this district so you don’t have this feeling that we’re creating mansions and not any affordable housing.

Commissioner Mouacheupao suggested that the Ford Master Plan be clearer about the affordability plan for the site, because people want to move there, but it seems financially inaccessible for a large portion of the residents in the city. As for the conversation around TIF districts, that should absolutely be a big point of consideration because they are a mechanism to build in affordability. If we’ve spent 10 years’ worth of resources in developing a plan that is not accessible for everybody who would potentially want to move there, then that is going to be a big disappointment and is unacceptable.

Commissioner Makarios asked if Ms. Clapp-Smith would walk through the vision for the build out and the timeline of the site. Also, he assured everyone that the question of affordability has been front and center not only among the task force but in the public input as well.

Commissioner DeJoy said that maybe when we say variety of housing, just expand on that a little saying for all income, because the plan does look like the Land of OZ. It is beautiful, but looks very expensive.

Commissioner Rangel Morales said that the border along Mississippi Rover Boulevard is logical from a market standpoint for large homes; whatever term you want to use for the housing, you have to call a spade a spade. There is a specific segment of the population that is going to be able to afford it, and he is surprised that there was not more of that district along that edge. There are some apartments across from Ford Parkway that are already relatively affordable, so it is possible for the market to offer income variety in that area. Whatever you call them, they look like
mansions and it is a little discouraging to see that expensive housing form dominate the river frontage.

Ms. Clapp-Smith said that in the Plan, there is one block along the river that is ‘residential low’ zoning for townhomes or small multi-family, and there are two blocks that are ‘Gateway’ zoning for employment. Ms. Clapp-Smith then talked about the site build out phasing, which is difficult to determine. Staff has talked to market people about how the market would want to build out the site and staff has talked to infrastructure people about what makes sense and the opinions vary. We generally expect that the infrastructure is expensive and will have to be built in phases to coincide with development, in order to create the return on investment to pay off the investment quickly. Starting along the edges makes sense to create development value without a large infrastructure investment and then moving into the site along major corridors such Montreal and Cretin. Putting these streets in early is important to relieve the transportation pressure as development is beginning on this site. What is understood from stormwater is that you have to do some preliminary design but maybe not a full build out right away. In summary, development is expected to move in from the edges and along the Cretin-Montreal spine. It will be essential for the Master Developer for the site to do a detailed phasing plan for infrastructure implementation and financing.

VIII. Neighborhood Planning Committee

Commissioner DeJoy would like an update about the Neighborhood Planning Committee and Comprehensive Planning Committee’s merger.

Donna Drummond, Planning Director, said that the two committees are merging for the time being, meeting jointly at the day and time of the regular Comprehensive Planning Committee meetings. The next joint meeting will be on Tuesday, June 13, 2017, and it will be a busy meeting with the Snelling South Zoning Study recommendations and follow up after the public hearing, then an introduction to the Land Use and Transportation chapter drafts.

Chair Reveel added that they will reevaluate sometime around October to see how that is working.

Ms. Drummond said that it is going to be busy, so we will have to take this and see how it goes because there are a number of items that have to come through committee review in addition to the Comprehensive Plan Update, so it will be busy at times. Also the joint committee had agreed to meet until 6:00 p.m. if needed to get all the business done.

Chair Reveel said we will see if it works. Because we have two new commissioners who are joining the Planning Commission and will be assigned to the Neighborhood Committee we may decide that the volume of work and the time constraints are too great and it should be split back into two committees earlier than next fall.

Commissioner DeJoy said that she has another commitment on Tuesdays so she cannot do that. She belongs to the Payne Arcade Business association and they meet on Tuesdays.

Commissioner Baker said that he needs to know the timing and frequency because of the Board of Education meetings for Saint Paul Public Schools are on Tuesdays.
Chair Reveal said that the meetings are every other week and asked if he could look at his schedule and see what works. We need may need to revisit this because Commissioner Underwood had problems with Tuesday as well. Depending on the agendas for the next several weeks then we may go back to use the Neighborhood time for the Neighborhood agenda and invite the Neighborhood members to come to the Comp. Planning if they can. However, we need to be sure that we have enough committee attendance at both committees that there can be solid discussion.

Commissioner DeJoy said that was the reason for merging.

Chair Reveal replied yes, we were not getting sufficient attendance and if people commit to attending these committee meetings then we can find a better time for members to keep that commitment.

IX. Transportation Committee

Commissioner Ochs announced that at the last meeting they had a brief discussion on the Mill and Overlay projects as opportunities for bike facilities, specifically on Stillwater Avenue. Also discussed was the Comprehensive Plan Transportation chapter, part II. The next Transportation Committee meeting is on Monday, June 5, 2017 at 4:00 p.m.

X. Communications Committee

No report.

XI. Task Force/Liaison Reports

Commissioner Edgerton announced that the Rice/Larpenteur Gateway Vision Plan Community Advisory Group met on Tuesday where a very good market research study was presented. There are two upcoming workshops, Wednesday, June 14, 2017 from 6-8 p.m. at Washington Technology Magnet School and another workshop on Wednesday, June 21, 2017 from 6-8 p.m. at Washington Technology Magnet School. On Tuesday, June 27th there is another Community Advisory Group meeting from 6-7 p.m. at Washington Technology Magnet School.

Commissioner Makarios announced that there will not be any more Ford Task Force meetings as they are finished, but the Commission will hear some official recommendations from the task force to change a few parts of the Ford plan and those will be presented at the public hearing.

Donna Drummond, Planning Director, announced that she has arranged for a tour of the State Capitol after the Planning Commission meeting on Friday, June 16, 2017.

XII. Old Business

None.

XIII. New Business

None.
XIV. Adjournment

Meeting adjourned at 11:03 a.m.

Recorded and prepared by
Sonja Butler, Planning Commission Secretary
Planning and Economic Development Department,
City of Saint Paul

Respectfully submitted,

[Signature]
Donna Drummond
Planning Director

Approved ___________
(Date)

[Signature]
Cedrick Baker
Secretary of the Planning Commission