



# MEMORANDUM

**SUBJECT:** East Grand Avenue Overlay District Zoning Study – Public Testimony and Revised Proposed Amendments

**TO:** Planning Commission

**FROM:** Comprehensive and Neighborhood Planning Committee

**DATE:** May 10, 2024

## SUMMARY

This zoning study provides background information and analysis of the East Grand Avenue Overlay District (EGAOD) standards and proposes amendments to the Overlay. The existing standards impose limitations on height and bulk of new development. The proposed amendments focus on walkable, human-scale building form and design. This memo includes a summary and analysis of public testimony and recommended amendments to the public hearing draft of the EGAOD zoning amendments released for public review on February 2, 2024.

## Table of Contents

Summary .....	1
Purpose of the Study .....	2
Background .....	3
Saint Paul 2040 Comprehensive Plan .....	3
Summit Hill/District 16 Neighborhood Plan .....	4
East Grand Avenue Overlay District (EGAOD).....	5
Retail Node Comparative Analysis and Mixed-Use Case Study .....	6
Development on East Grand Avenue.....	6
Policy Analysis.....	7
Advisory Committee.....	8
Planning Commission Public Hearing Testimony .....	10

Public Hearing.....	10
Analysis of Testimony .....	11
Proposed Amendments .....	13
Sec. 67.601. Establishment; intent. ....	14
Suggested Action .....	14
Existing Text.....	14
Proposed Amendment.....	14
Discussion.....	14
Sec. 67.602. Standards and regulations. ....	14
Suggested Action .....	14
Existing Text.....	14
Proposed Amendment – Revised Draft ( <i>current proposal</i> ) .....	14
Discussion.....	15
Recommendation.....	17
Attachments.....	17

## PURPOSE OF THE STUDY

The Summit Hill Association (SHA) is in the process of updating their neighborhood’s District Plan, which will include policies regarding land use and the scale of development. The East Grand Avenue Overlay District (EGAOD) Zoning Study was initiated by the Planning Commission in September 2022 to support the Summit Hill Association in maintaining Grand Avenue as a vibrant, mixed-use corridor, consistent with Saint Paul 2040 Comprehensive Plan policies that call for transit-supportive density, flexible building design and development standards, high quality urban design that supports pedestrian friendliness, and active first floor uses.

In the summer of 2021, a proposal for 695 Grand Avenue, a five-story mixed-use development, spurred robust community input and discussions at Planning Commission and City Council about the role of the EGAOD and potential inconsistencies with 2040 Comprehensive Plan policies. Based on the feedback obtained through a January 2021 neighborhood plan survey facilitated by SHA and community input provided during the 695 Grand zoning application process, SHA and the Ward 2 Council office expressed interest in the City completing a zoning study to analyze the EGAOD and consider Zoning Code text amendments.

The purpose of the EGAOD Zoning Study is to analyze the EGAOD and develop recommended amendments that implement policies from the 2040 Comprehensive Plan. [Minnesota Statute Section 473.858](#) requires the zoning code to be brought into conformance with the comprehensive

plan by the local government unit. The amendments drafted as part of this study are based on analyses completed by City staff and recommendations provided by a community Advisory Committee facilitated by Michael Lamb Consulting, LLC. The City staff analyses are summarized below:

- **Background Research.** Review of relevant 2040 Comprehensive Plan policies and existing studies conducted for Grand Avenue, including the Retail Node Comparative Analysis and Mixed-Use Case Study for Neighborhood Planning on Grand Avenue led by LOCi Consulting. See below for more information.
- **Zoning Analysis.** Evaluation of existing land uses and development standards in the nine underlying zoning districts, EGAOD regulations, and Traditional Neighborhood (T2) design standards, including a diagnosis of potential challenges and opportunities.
- **Microscale Analysis.** Analysis of existing physical development patterns, land uses, and building massing, form, scale, and intensity on all blocks within the EGAOD, including documentation of contextual consistencies and outliers where present in the field.
- **Case Study Research.** Evaluation of comparable corridors and associated regulations in Saint Paul, Minneapolis, Edina, Stillwater, and Council Bluffs, Iowa. Overall, case study research showed that without an overlay, corridors have the potential for more development variety and flexibility, but do not necessarily experience immense development pressure or short-term change. Overlays can be used to maintain unique design elements and contextual development patterns without constraining development.

The scope of this Zoning Study does not include proposed amendments to underlying zoning districts or regulations of the Grand Avenue Special Sign District.

## BACKGROUND

### Saint Paul 2040 Comprehensive Plan

The 2040 Comprehensive Plan was adopted on November 18, 2020. The following 2040 Comprehensive Plan policies relate to the EGAOD, some of which are inconsistent with the existing zoning regulations. See below for a policy analysis.

- LU-1. Encourage transit-supportive density and direct the majority of growth to areas with the highest existing or planned transit capacity.
- LU-5. Encourage flexible building design to ensure ongoing functionality and viability, and to respond to new market opportunities.
- LU-7. Use land use and zoning flexibility to respond to social, economic, technological, market and environmental changes, conditions and opportunities.
- LU-9. Promote high-quality urban design that supports pedestrian friendliness and a healthy environment, and enhances the public realm.

- LU-10. Activate streetscapes with active first-floor uses, street trees, public art, outdoor commercial uses and other uses that contribute to a vibrant street life.
- LU-27. Provide for land use change and rezoning of land adjacent to Mixed-Use areas to allow for commercial redevelopment and/or expansion fronting arterial and collector streets.
- LU-28. Support pedestrian-friendly streetscapes and visual interest through commercial building design.
- LU-29. Ensure that building massing, height, scale and design transition to those permitted in adjoining districts.
- H-8. Encourage creativity in building design and site layout.
- H-46. Support the development of new housing, particularly in areas identified as Mixed Use, Urban Neighborhoods, and/or in areas with the highest existing or planned transit service, to meet market demand for living in walkable, transit-accessible, urban neighborhoods.
- H-47. Encourage high-quality urban design for residential development that is sensitive to context, but also allows for innovation and consideration of market needs.

## **Summit Hill/District 16 Neighborhood Plan**

On February 15, 2006, the City Council passed Resolution 06-166, which included the adoption of the Summit Hill/District 16 Neighborhood Plan summary as a Comprehensive Plan addendum and initiated a zoning study to consider an overlay zoning district for property along East Grand Avenue.<sup>1</sup> The existing Summit Hill/District 16 Neighborhood Plan's vision is to "maintain and reinforce Grand Avenue as an eclectic mix and balance of housing, and small-scale shops, restaurants, and services, both locally and nationally owned, for residents and visitors. Grand Avenue shall continue to be a mix of buildings that respect the historic character of the avenue and neighborhood and that relate closely to the sidewalk and encourage pedestrian activity at the street level." The Plan also aims to "preserve the pedestrian-friendly, historic residential and commercial character" of the neighborhood, with "greatly enhance[d] pedestrian safety" and "reduce[d] commercial spillover to residential streets."

The Plan includes strategies to implement the vision, some of which informed the creation and adoption of the EGAOD in 2006, including:

- G3 Design Standards. Adopt TN2 design standards for East Grand in an overlay district. These design standards reinforce human-scale building characteristics, promote quality in architectural materials, reinforce a pedestrian-focused streetscape, promote underground parking for mixed-use developments, and visually screened surface parking for smaller,

---

<sup>1</sup> The existing Summit Hill/District 16 Neighborhood Plan Summary is located here: <https://www.stpaul.gov/DocumentCenter/View/7/Summit%2520Hill%2520Plan%2520Summary-District%252016.pdf>

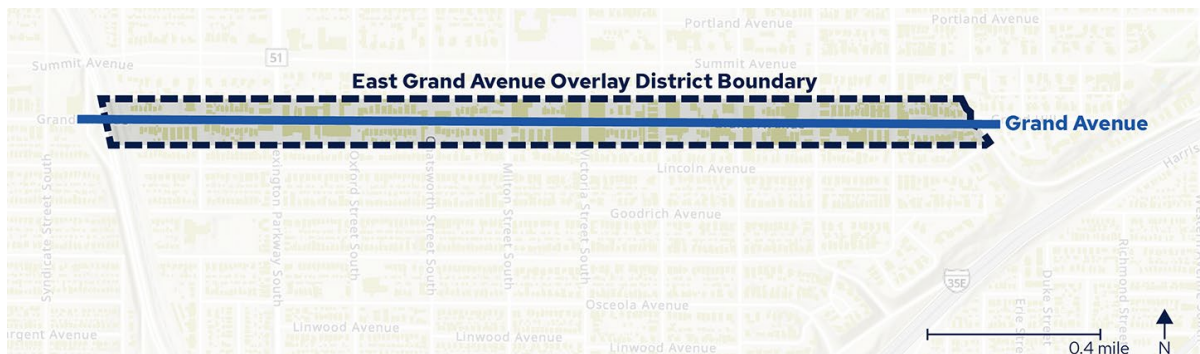
single-use developments, and promote signage that is consistent with building architecture and business function, and complements the eclectic nature of the avenue.

- G10 Scale and Height Limits. Adopt limitations of the height and scale on new buildings on East Grand Avenue in an overlay district, as follows:
  - Limit new buildings to a footprint of 25,000 square feet or less.
  - Limit new building total size, above ground, to 75,000 square feet or less, including parking.
  - Limit building height to three stories, or to 30 feet for commercial projects and to 36 feet for mixed commercial and residential projects, whichever is lower. No additional height will be allowed, even with setbacks.
  - Work with the City to adopt the desired limitations for Grand Avenue.

### **East Grand Avenue Overlay District (EGAOD)**

Following the adoption of the 2006 Summit Hill/District 16 Neighborhood Plan, the Planning Commission recommended the adoption of the ordinance amending Chapter 67 of the Legislative Code to incorporate [Article VI - 67.600 EG East Grand Avenue Overlay District](#), which City Council adopted on July 12, 2006. The ordinance established the properties along East Grand Avenue between Ayd Mill Road and Oakland Avenue as being within the EGAOD and applied the limitations specified in the neighborhood plan's policies G3 and G10 to these properties. The EGAOD limits buildings to a maximum footprint size of 25,000 square feet, total size of 75,000 sf, and three stories in height, and requires properties meet T2 traditional neighborhood district design standards. There is also a provision that does not allow properties changing to a use that required five or fewer parking spaces more than the existing use to be exempted from providing the additional parking spaces. This no longer applies since off-street parking requirements were eliminated in 2021. Per [Sec. 67.600](#), the intent of the overlay is to "provide design standards and building height, size, and footprint limits, and to reduce the shortage of parking in the east Grand Avenue area."

**Figure 1: East Grand Avenue Overlay District Boundary**



The May 23, 2006, staff memo to the Planning Commission regarding the public hearing on the EGAOD provides additional background stating that "The Summit Hill Association proposed an

overlay district...due to concerns regarding the scale of new buildings on East Grand Avenue, design of buildings and lots, and the shortage of parking” and that in 2005, the City Council adopted a moratorium prohibiting the “issuance or approval of plats, lot splits, and building or zoning permits, of the development of new buildings and substantial enlargements of existing buildings” along Grand Avenue between Ayd Mill Road and Oakland Avenue.

In the June 29, 2021, letter to the Zoning Committee of the Planning Commission regarding the Rezoning, Conditional Use Permit, and Variance Applications for the 695 Grand Avenue Redevelopment, the applicant stated that “there was and continues to be a strong desire to manage spillover effects in what was already an established, relatively dense streetcar corridor, to retain the neighborhood’s human scale and walkability, to foster local ownership while discouraging big box chain store tenants.” Interest in maintaining the vibrancy of Grand Avenue and concerns about displacement of independent businesses also came up in the testimony heard at public hearings for the EGAOD ordinance.

Except for the land within the Ayd Mill Road and adjacent railroad right-of-way, all properties within the EGAOD are located within the State Historic Hill District and properties east of St. Albans Street are located within the National Historic Hill District. [Minnesota Statutes 116D.04](#) and [Minnesota Rule 4410.4300 Subp. 31](#) mandates that demolition in whole or part must be reviewed prior to commencement of work. In Saint Paul, this review is accomplished by Heritage Preservation staff in the Planning & Economic Development Department.

## **Retail Node Comparative Analysis and Mixed-Use Case Study**

As mentioned above, the SHA is in the process of updating their neighborhood’s District Plan. LOCi Consulting, LLC was engaged by SHA to conduct a retail real estate and mixed-use analysis to support the neighborhood planning process. The 2021 report includes key findings related to consumer and retail patterns as well as development, including that “mixed-use projects in the pipeline have been increasing in size and scale compared to recently completed projects” and “land and construction costs drive the need for height and scale on mixed-use developments.”

Recommendations directly related to the EGAOD include “consider removing the East Grand Avenue overlay requirement on building height and building footprint,” “replace the overlay requirements with detailed design guidelines for mixed-use projects,” support a partnership with Lunds & Byerlys to approve the mixed-use project, and establish working groups to promote vibrant mixed-use development along Grand to support business needs.

## **Development on East Grand Avenue**

Since the EGAOD was established in 2006, there has been little development on East Grand Avenue. Development has mostly consisted of commercial remodeling for new tenants and construction of restaurant patios. In 2012, a single-family home was demolished to create a parking lot for a business. In the last four years, a three-story condominium building replaced a single-family home, a new one-story restaurant replaced a two-story commercial building, and the five-story mixed-use development at 695 Grand (see above) replaced a one-story commercial building and parking lot. In

2019, concept plans for a mixed-use development with a Lunds & Byerlys at Grand Avenue and Avon Street were unveiled, but planning for the site has been paused.

## **POLICY ANALYSIS**

The EGAOD limits building footprints to 25,000 square feet, total building size to 75,000 square feet, and building height to 3 stories and 30 feet for commercial buildings, 36 feet for mixed commercial-residential buildings, and 40 feet for residential or institutional buildings, with no additional height based on setbacks allowed. These limits apply to every lot within the overlay, regardless of the size of the lot or its position within the block. The Saint Paul Zoning Code does not establish any other overlay or zoning district with limitations on building size and footprint in this manner. The strict limitations placed on properties on East Grand Avenue are overly prescriptive and result in larger-sized lots being comparatively more restricted than smaller-sized lots in terms of development potential.

Comprehensive Plan policies LU-5, LU-7, and H-47 call to “encourage flexible building design to ensure ongoing functionality and viability, and to respond to new market opportunities”, “use land use and zoning flexibility to respond to social, economic, technological, market and environmental changes, conditions and opportunities”, and “encourage high-quality urban design for residential development that is sensitive to context, but also allows for innovation and consideration of market needs.” With the EGAOD’s constraints on building size, height, and footprint, innovation, flexibility in design, and the ability to respond to changes and opportunities and be sensitive to context is severely hindered for properties within the overlay compared to other Saint Paul properties, especially those of larger size. For example, a building may be most functional, fit in the with neighborhood context, and be able to respond to a new market opportunity if it were designed to reduce the appearance of the building’s massing, such as being U-shaped or having greater setbacks to accommodate a courtyard or patio. To be financially viable, the building may need to be built taller than the overlay currently allows. Such a building could be developed in an RM2 zoning district in another part of the city with a maximum 50-foot height and 2.25 FAR, but would likely not be able to be developed in an RM2 zoning district on Grand Avenue due to the overlay’s additional restrictions.

Policies LU-1, LU-27, and H-46 call to “encourage transit-supportive density and direct the majority of growth to areas with the highest existing or planned transit capacity” and “provide for land use change and rezoning of land adjacent to Mixed-Use areas to allow for commercial redevelopment and/or expansion fronting arterial and collector streets, and “support the development of new housing, particularly in areas identified as Mixed Use, Urban Neighborhoods, and/or in areas with the highest existing or planned transit service, to meet market demand for living in walkable, transit-accessible, urban neighborhoods.” Grand Avenue is a collector street with medium-high transit capacity and designated with the Mixed Use future land use category. Bus route 63 along Grand Avenue is part of Metro Transit's high frequency network with service every 15 minutes, or more

frequently on most weekdays and Saturdays.<sup>2</sup> Route 65 runs along Dale Street with service every 30-60 minutes. The Grand Avenue corridor is also identified as a longer-term priority corridor in Metro Transit's vision for the Arterial BRT network.<sup>3</sup> The overlay's strict restrictions on building footprint, total building size, and three-story height along limits business growth, housing and commercial development, and transit-supportive densities, all along a high-frequency transit route. Because all properties within the overlay are subject to the same restrictions, regardless of the underlying zoning, a rezoning is not a useful tool to allow for commercial development and/or expansion fronting East Grand Avenue.

Policies LU-9 and LU-28 call to "promote high-quality urban design that supports pedestrian friendliness and a healthy environment, and enhances the public realm" and "support pedestrian-friendly streetscapes and visual interest through commercial building design". Properties within the EGAOD need to meet the T2 design standards, which include standards that promote high-quality urban design to support pedestrian friendliness and an enhanced public realm, including buildings anchoring the corner, front yard landscaping, building façade continuity and articulation with elements related to the human scale, definition of residential entries, high quality materials and detailing, street trees, screened parking, and pedestrian-scale lighting. The overlay's strict restrictions on building footprint, total building size, and three-story height can make it financially difficult to provide visual interest through building design and pedestrian-friendly streetscapes.

## **ADVISORY COMMITTEE**

The City and a technical assistance consultant, Michael Lamb Consulting, LLC, assembled an Advisory Committee to guide the Zoning Study's direction and provide advisory recommendations for consideration as the City prepares Zoning Code text amendments. The Advisory Committee consisted of community members that were selected by the consultant with support from City staff and the SHA. The selection process included an objective review of applicant ages, genders, affiliations, and life experiences to achieve a variety of perspectives: 13 members were selected, with 12 members participating through completion of the Advisory Committee process. The Advisory Committee met seven times from November 2022 to March 2023 and participated in consultant-led activities and discussions. Topics included:

- Grand Avenue history,
- Comprehensive Plan and policy direction,
- Real estate market and development economics,
- Zoning and redlining,
- Affordable housing and equitable development, and
- Physical development patterns and design standards.

---

<sup>2</sup> <https://www.metrotransit.org/high-frequency-network>

<sup>3</sup> *Network Next*, <https://www.metrotransit.org/Data/Sites/1/media/network-next/network-next-arterial-brt-final-report.pdf>.



The charge of the Advisory Committee was to create [advisory guiding principles](#) for consideration throughout the zoning study and drafting of text amendments. Table 1, Advisory Committee Guiding Principles, summarizes the principles and the ways in which they are, or could be, implemented, if adopted as recommended by City staff. For more information on proposed text amendments, see the section below. Notes from all Advisory Committee meetings are published [online here](#).

**Table 1: Advisory Committee Guiding Principles**

Guiding Principle	Implementation
<b>Support walkable, pedestrian-scaled built environment</b>	
Support patio, outdoor eating and gathering spaces that front onto Grand Avenue	See proposed text amendments, Sec. 67.602(b)(2), Established Building Line. This standard requires building façade consistency based on surrounding context but allows flexibility for setbacks to support usable outdoor seating and/or gathering space.
Allow setbacks and patios specifically for outdoor gathering and dining	
Building frontages should be oriented to the public sidewalk/street and contain pedestrian-scaled elements like transparent shopfronts, awning, stoops, porches, signage, etc.	See proposed text amendments, Sec. 67.602(b)(3), Frontage Elements. This standard requires frontage elements that relate to the human-scale. See also existing Code, Sec. 63.110, Building Design Standards, and Sec. 66.343, Traditional Neighborhood District Design Standards.
<b>Manage parking on-street, behind buildings or underground</b>	
Parking should be located behind principal buildings	See existing Code, Sec. 66.343, Traditional Neighborhood District Design Standards, and Sec. 66.341(a), Placement of Parking, including standards that require parking to be placed in the rear, parking entries be minimized, and structured parking be lined with other uses. See also future, staff-proposed drive-through amendments.
Surface parking should not be allowed to front Grand Avenue	
Drive-through uses with direct access from Grand Avenue should be limited	
Regulate location and landscape of surface lots	See existing Code, Sec. 63.314, Landscaping.
District and development-specific parking can include structures, dedicated and/or below surface lots and under buildings	Existing Code allows flexibility for different parking configurations based on development type.
<b>Activate ground floor spaces in appropriate building types</b>	
If a multi-family or mixed-use building includes commercial/retail space, it must have a transparent shopfront that relates to and defines the public ROW/sidewalk	See proposed text amendments, Sec. 67.602(b)(3), Frontage Elements. This standard requires frontage elements that relate to the human-scale. See also existing Code, Sec. 63.110, Building Design Standards, and Sec. 66.343, Traditional Neighborhood District Design Standards.
Minimum shopfront window transparency, posters and other ad displays should not block window transparency	
Primary entries oriented to the public sidewalk; corner entrances preferred	
<b>Consider evaluating building design and materials through a future zoning study</b>	
Committee recommends a more detailed study to prepare guidelines/regulations that address quality design and building materials	To be addressed in the future.
<b>Ensure new building heights are sensitive to the existing neighborhood context</b>	
If buildings exceed three stories, they should include stepbacks, reduced lot coverage, and other features to mitigate height relationship,	See proposed text amendments, Sec. 67.602(b)(1), Stepbacks. This standard requires buildings with a height

**Table 1: Advisory Committee Guiding Principles**

Guiding Principle	Implementation
shadows and other impacts to the surrounding neighborhood	greater than 30 feet to be stepped back a minimum of 10 feet from the setback lines.
Taller buildings should be set back from the alley to allow for parking in the rear and/or include setbacks to respond to the scale and height of adjacent neighborhood buildings	
<b>Allow density and taller buildings at the corners where development opportunities are available</b>	
New development and taller buildings should be allowed at corners	See proposed text amendments, Sec. 67.602(b)(2), Established Building Line. This standard requires buildings to be placed within 10 feet of the lot line, including along both streets of a corner lot.
Prioritize mixed-use buildings at key intersection locations	
Corner building heights should be carefully managed	
Lot coverage and height might be regulated by a ratio	
Underutilized lots may include surface parking lots or one story buildings with large setbacks from Grand Avenue	
<b>Maintain existing building elements, vertical proportions and frontage conditions found at mid-block locations</b>	
New development at mid-block locations should include the following:	
Vertical window proportions	See proposed text amendments, Sec. 67.602(b)(3), Frontage Elements. This standard requires frontage elements that relate to the human-scale. See also existing Code, Sec. 63.110, Building Design Standards, and Sec. 66.343, Traditional Neighborhood District Design Standards.
Vertically oriented building bays	
Elevated terraces and/or front yard	
Front entries that are well defined and legible from the street	
Details should include horizontal expressions with cornices, courses and material change	
Converted businesses located in existing residential building types should maintain lawn/greenspace setbacks, if applicable	

## PLANNING COMMISSION PUBLIC HEARING TESTIMONY

### Public Hearing

On Friday, April 12, 2024, the Saint Paul Planning Commission held a public hearing on the EGAOD Zoning Study. Notice of the public hearing was published in the Saint Paul Legal Ledger on April 2, 2024 and sent to the Early Notification System list on February 27, 2024. Eight community members provided verbal testimony at the public hearing and 24 community members submitted written testimony during the public comment period open from February 2 through April 15, 2024. Of the written comments received, one was received from the Summit Hill Association, two were received from other local organizations (Sustain Saint Paul, Macalester Urbanists), and 21 were received from community members.

Fifteen written comments explicitly supported the proposed amendments, most of which offered suggestions for recommended edits; eight did not explicitly support or oppose the proposed amendments and shared concerns and/or suggestions for preferred edits; one explicitly opposed the amendments and shared concerns. See Attachment 4, Written Testimony, for more information.

## **Analysis of Testimony**

The testimony can generally be organized as follows:

**Zoning Study Support.** The majority of testimony was in support of the Zoning Study. Many comments expressed a desire to encourage investment and new development to maintain Grand Avenue’s vibrancy for residents and businesses. Testimony largely supported the proposed standards for active frontage elements and setbacks that allow buildings to have a strong relationship to the street but also have flexibility for patio and front yard space. Some testimony included a recommendation to repeal the EGAOD, especially if pedestrian-oriented standards could be maintained.

Response: While some verbal and written testimony supported a repeal, the Advisory Committee did not explicitly recommend a repeal. Instead, the Advisory Committee generally supported balanced development flexibility focused on pedestrian-oriented design. While some 2040 Comprehensive Plan policy direction and best practice research could support a repeal of the EGAOD, the updated proposal focuses on being responsive to the Advisory Committee by proposing a revised set of text amendments that better accommodate development flexibility, reflect the urban design of Grand Avenue, and maintain pedestrian-oriented design.

**Stepback Suggestions to Increase Flexibility.** The majority of testimony offered suggestions to revise the stepback standard for more flexibility. Some comments expressed concerns that the proposed stepback requirements above 30 feet would limit design flexibility and functionality for smaller-scale buildings consistent with existing development on Grand Avenue. Ideas for amendments included applying stepbacks at a height taller than 30 feet, such as 40 feet, reducing/changing the stepback depth from a general 10-foot requirement to 5 feet or a distance equal to additional height, exempting lots with less street frontage (e.g., lots with fewer than 100-200 feet of street frontage), and only applying stepback requirements to building facades along front yards and side street yards. Additionally, some testimony noted that the proposed exemption of “corner elements” from stepback standards is subjective.

Response: The proposed required 10-foot stepback from all minimum setback lines for heights above 30 feet could limit smaller-scale development, especially on lots narrower than 60 feet wide. Modern construction methods and market preferences require taller building heights of 32-40 feet for three-story buildings, with 10.5-12-foot residential stories and 12-15-foot commercial stories. Requiring building heights above 30 feet to step back from all minimum setback lines would render many projects above two or three stories unviable due to the loss of square footage and very narrow upper floor space. A revised stepback requirement for buildings taller than 40 feet is supported for several reasons:

- It allows greater flexibility for achieving three stories without stepping back. The current EGAOD establishes a three-story maximum, so it is logical for the proposed updated EGAOD to allow three-story development on all lot sizes without additional restrictions.
- 40 feet is close to the 39-foot maximum building height in the new H2 residential district, the prevalent zoning district for Lincoln Avenue and Summit Avenue properties across the alley from Grand Avenue.
- 40 feet is the approximate height where pedestrians lose a visual connection to upper stories, and vice versa. Building design and development is most human scaled at or below 40 feet, contributing most substantially to pedestrian friendliness and street vitality.

Changing the setback depth from 10 feet to “a distance equal to the additional height” matches how the T districts and some B districts manage taller heights above a certain height or adjacent to lower-density residential districts, requiring angled setbacks that increase in depth as the building increases in height. Requirements for setbacks from all minimum setback lines above a certain building height can still limit development to three stories on smaller lots. A revised setback requirement that applies only along front yards, side street yards, and rear yards along the alley would increase flexibility while addressing height and scale concerns (see below).

The corner elements exemption was generally considered to be well-intended, but overly subjective. A dimensional standard that allows 15 feet of each street-facing building façade to be exempt from the setback requirement would maintain the intent of the exemption but improve its utility.

**Height and Scale Concerns.** Some testimony included concerns with tall building heights and proper scale transitions to rear neighborhood-scale neighbors across alleys, fronting Lincoln Avenue and Summit Avenue. Comments expressed that the proposed setback requirements are not sufficient to mitigate impacts to surrounding properties and preserve access to sunlight. Ideas to improve this included required setbacks that are equal to the additional height above 30 feet instead of a general 10-foot requirement, specifications for corner elements that must step back equal to the additional height above 45 feet, additional setback requirements for buildings over 40 feet, and additional setback requirements along side yards and alleys.

Response: It is important for buildings to transition to surrounding development in adjoining districts per 2040 Comprehensive Plan policy LU-29. There must be a balance between allowing for investment and redevelopment along Grand Avenue and ensuring new development is sensitive to the surrounding context. Ninety-eight percent of East Grand Avenue lots are zoned RM2, which has a maximum building height of 50 feet (75 feet with a conditional use permit if at least half or parking is structured) or B2, BC, or B3, which all have a maximum building height of 30 feet (can be exceeded if the structure is setback from all setback lines a distance equal to the additional height). Considering these maximum building heights allowed along Grand Avenue and testimony that emphasized transitions in scale to neighbors across the alley and street-facing facades, the revised requirement for setbacks above 40 feet only along the minimum front and/or side street setbacks and setbacks above 30’ along rear property lines abutting RL-

H2 lots should more effectively ensure transitions to lower-scale development along the alley while still allowing flexibility along Grand Avenue.

## PROPOSED AMENDMENTS

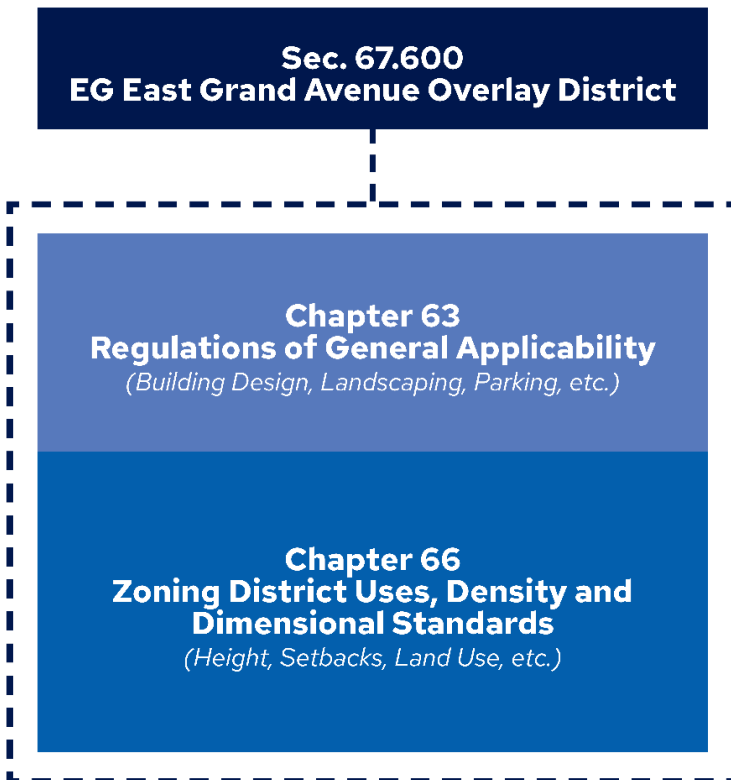
The proposed Zoning Code text amendments work together with other standards in the Zoning Code. The Overlay District applies in addition to (i.e., “on top of”) general Code regulations (e.g., building design, landscaping, parking, etc.) and underlying zoning district uses, density, and dimensional standard (e.g., height, setbacks, land use, etc.). The stepbacks provision (Sec. 67.602(b)(1)) is the only standard with proposed changes from the public hearing draft, as noted in Table 2, below.

**Table 2: Proposed Text Amendment Changes**

Public Hearing Draft	Revised Draft
<p><u>Stepbacks. All portions of a building above a height of thirty (30) feet must be stepped back a minimum of ten (10) feet from all minimum setback lines, except for corner elements on the street-facing side(s) of corner lots.</u></p>	<p><u>Stepbacks. All portions of a building above a height of forty (40) feet must be stepped back from the minimum front or side street setback lines a distance equal to the additional height, except for front or side street building facades within fifteen (15) feet of the building corner. Buildings must be no more than thirty (30) feet high along property lines abutting RL-H2 lots at an alley; buildings may exceed this thirty (30) foot height limit if stepped back from rear property lines a distance equal to the additional height.</u></p>

Revisions to the public hearing draft text amendments are noted below.

**Figure 2: Zoning Code Regulatory Layers**



## **Sec. 67.601. Establishment; intent.**

### Suggested Action

Update EG East Grand Avenue Overlay District intent statement.

### Existing Text

The EG East Grand Avenue Overlay District is established as shown on the official zoning map accompanying this code to provide design standards and building height, size, and footprint limits, and to reduce the shortage of parking in the east Grand Avenue area.

### Proposed Amendment

The EG East Grand Avenue Overlay District is established as shown on the official zoning map accompanying this code to provide design standards ~~for development and building height, size, and footprint limits, and to reduce the shortage of parking~~ in the east Grand Avenue area.

### Discussion

The proposed amendments to Sec. 67.602, Standards and Regulations, do not directly relate to building height, size, footprint limits, or parking requirements, so the intent statement should be generalized.

## **Sec. 67.602. Standards and regulations.**

### Suggested Action

Maintain applicability to Traditional Neighborhood design standards. Remove development constraints. Add pedestrian-oriented, context-sensitive design standards. Remove obsolete parking provision. Add parking design standards for pedestrian safety and vibrancy.

### Existing Text

- (a) *Design standards.* The TN2 design standards in section 66.343 apply.
- (b) *Building regulations.*
  - (1) The maximum building footprint shall be twenty-five thousand (25,000) square feet.
  - (2) Total building size, above ground, shall be limited to seventy-five thousand (75,000) square feet, including parking.
  - (3) Building height shall be limited to three (3) stories and to thirty (30) feet for commercial buildings, three (3) stories and thirty-six feet (36) for mixed commercial-residential mixed use buildings, and three (3) stories and forty (40) feet for residential or institutional buildings. No additional height based on setbacks is allowed.
- (c) *Parking.* The provision in section 63.204(a) that exempts a change in use to a new use that requires five (5) or fewer spaces more than the existing use from providing the additional spaces shall not apply.

### Proposed Amendment – Revised Draft (*current proposal*)

- (a) *Design standards.* The TN2 ~~design~~ standards in sections ~~66.341(a) and~~ 66.343 apply.

(b) *Building and frontage regulations.*

~~(1) The maximum building footprint shall be twenty-five thousand (25,000) square feet.~~

~~(2) Total building size, above ground, shall be limited to seventy-five thousand (75,000) square feet, including parking.~~

~~(3) Building height shall be limited to three (3) stories and to thirty (30) feet for commercial buildings, three (3) stories and thirty-six feet (36) for mixed commercial-residential mixed use buildings, and three (3) stories and forty (40) feet for residential or institutional buildings. No additional height based on setbacks is allowed.~~

(1) *Stepbacks.* All portions of a building above a height of forty (40) feet must be stepped back from the minimum front or side street setback lines a distance equal to the additional height, except for front or side street building facades within fifteen (15) feet of the building corner. Buildings must be no more than thirty (30) feet high along property lines abutting RL-H2 lots at an alley; buildings may exceed this thirty (30) foot height limit if stepped back from rear property lines a distance equal to the additional height.

(2) *Established building line.* The maximum front and side street setbacks is ten (10) feet. If an interior lot is on or abutting BC or residential zoning, it may have setbacks up to twenty-five (25) feet to relate to the existing established building façade line. Up to forty (40) percent of the building façade on any lot may exceed this maximum setback to create outdoor seating or gathering areas.

(3) *Frontage elements.* The base thirty (30) feet of building sides facing abutting public streets must include elements that relate to the human scale at grade. Elements include doors, windows, projections, awnings, canopies, porches, stoops, etc.

~~(c) *Parking.* The provision in section 63.204(a) that exempts a change in use to a new use that requires five (5) or fewer spaces more than the existing use from providing the additional spaces shall not apply.~~

## Discussion

The design standards for the T2 zoning district should still apply to development in the EGAOD area. These standards prescribe walkable development with active ground-floor uses and facades and frontages that provide a relationship to the public realm. The proper zoning district (T2) should be cited, along with a new cross-reference within the Traditional Neighborhood section to ensure proposed EGAOD development is subject to all appropriate parking design standards.

**Building and Frontage Regulations.** The existing building regulations are proposed to be deleted and replaced with standards that ensure new EGAOD development is pedestrian-oriented and context-sensitive, without adding constraints on building height or bulk. The existing regulations impose maximum building footprint, building size, and height on all properties regardless of the underlying zoning district or size of the lot, which limits development potential in an overly general way. Because the existing regulations do not account for the size of lot, larger lots are treated unequally and in a way that can be challenging to develop. Building height and intensity is appropriately addressed in the underlying zoning district standards, so there is not a need for the EGAOD to subject development to other restrictions.

**Stepbacks** (*updated per public hearing draft revisions*). The revised proposed stepback regulation requires buildings with a height greater than 40 feet, which is approximately 3-4 stories, to be stepped back a distance equal to any additional height over 40 feet, as measured from the minimum setback lines. The revised regulation applies to the front and, when on a corner lot, the side street-facing side of buildings. This regulation offsets the perception of building intensity from the street by requiring that any building that exceeds the typical Grand Avenue scale will be stepped back further from the main building façade and/or street. Fifteen feet of the street-facing building facades on corner lots is exempt from the stepback requirement to encourage buildings to hold the corner and contribute meaningfully to the public realm. The revised regulation also imposes a maximum height of 30 feet along rear property lines abutting RL-H2 lots. Buildings may only be taller than 30 feet on the rear property line if stepped back a distance equal to the additional height. This is intended to effectively scale taller buildings when adjacent to rear neighborhood-scale properties across the alley (fronting Lincoln Avenue or Summit Avenue). The revised stepback standard works together with the existing height limitations established in the underlying zoning districts, which still apply.

**Established Building Line.** The proposed established building façade line regulation requires building façade consistency based on surrounding context and allows flexibility for setbacks to support usable outdoor seating and/or gathering space. In high intensity intersections, commercial mid-block areas, and corner lot conditions where buildings are built against the sidewalk, new development will be required to match this pattern by being placed within 10 feet of the sidewalk. However, if an applicant is proposing usable outdoor space for outdoor dining or a similar use, there is flexibility for up to 40 percent of the building façade to exceed the maximum setback to facilitate this street-facing activity. In neighborhood-scale mid-block conditions where buildings are set back further from the street, new development will be allowed to match the neighborhood pattern with a façade set back further from the street. This standard works together with, and may be more restrictive than, the existing setback regulations established in the underlying zoning districts and related standards in Sec. 63.110, Building Design Standards.

**Frontage Elements.** The proposed frontage elements regulation builds on frontage standards in Sec. 63.110, Building Design Standards, and Sec. 66.343, Traditional Neighborhood District Design Standards, by requiring frontage elements that relate to the human-scale for the lower 30 feet of buildings. This ensures that new EGAOD development will maintain a high-quality, pedestrian-oriented environment through high amounts of transparency on retail shopfronts or other active ground floor uses, projections or awnings over outdoor gathering spaces, and/or porches and stoops on new house-scale buildings.

**Parking Regulations.** The existing parking regulation is proposed to be deleted as it is no longer relevant given the 2021 removal of minimum parking requirements.



## **RECOMMENDATION**

The Comprehensive and Neighborhood Planning Committee recommends that the Planning Commission forward the resolution to City Council with a recommendation for adoption of the attached text amendments.

## **ATTACHMENTS**

1. Planning Commission Resolution Initiating EGAOD Zoning Study
2. Proposed Amendments
3. Advisory Committee Guiding Principles, "Principles for a Better Grand Avenue"
4. Written Testimony

city of saint paul  
planning commission resolution  
file number 22-36  
date September 16, 2022

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

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

WHEREAS, the City of Saint Paul has established the EG East Grand Avenue Overlay District in Chapter 67.600 in 2006; and

WHEREAS, the EG East Grand Avenue Overlay District constrains development of new projects on East Grand Avenue; and

WHEREAS, the 2040 Comprehensive Plan's implementation chapter calls for analyzing and considering revisions to the Zoning Code, including dimensional standards, in response to the 2040 Comprehensive Plan; and

WHEREAS, the 2040 Comprehensive Plan, in several Land Use and Housing policies, calls for transit-supportive density, flexible building design and development standards, high quality urban design that supports pedestrian friendliness, and active ground floor uses; and

WHEREAS, community feedback reflects support for East Grand Avenue as a vibrant, mixed-use corridor with flexibility for walkable, context-based development; and

NOW, THEREFORE, BE IT RESOLVED, under provisions of Section 61.801(b) of the Legislative Code, that the Planning Commission initiates the East Grand Avenue Overlay District Zoning Study to consider amendments to the Zoning Code pertaining to the EG East Grand Avenue Overlay District development standards in Chapter 67.600 and associated standards.

moved by Holst

seconded by Taghioff

in favor Unanimous

against \_\_\_\_\_

PART II - LEGISLATIVE CODE  
TITLE VIII - ZONING CODE  
Chapter 67. - Zoning Code—Overlay Districts  
ARTICLE VI. 67.600. EG EAST GRAND AVENUE OVERLAY DISTRICT

---

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

ARTICLE VI. 67.600. EG EAST GRAND AVENUE OVERLAY DISTRICT

**Sec. 67.601. Establishment; intent.**

The EG East Grand Avenue Overlay District is established as shown on the official zoning map accompanying this code to provide design standards for development and building height, size, and footprint limits, and to reduce the shortage of parking in the east Grand Avenue area.

(C.F. No. 06-561, § 1, 7-12-06)

**Sec. 67.602. Standards and regulations.**

- (a) *Design standards.* The TN2 ~~design~~ standards in sections 66.341(a) and 66.343 apply.
- (b) *Building and frontage regulations.*
- (1) ~~The maximum building footprint shall be twenty-five thousand (25,000) square feet.~~
- (2) ~~Total building size, above ground, shall be limited to seventy-five thousand (75,000) square feet, including parking.~~
- (3) ~~Building height shall be limited to three (3) stories and to thirty (30) feet for commercial buildings, three (3) stories and thirty-six feet (36) for mixed commercial residential mixed use buildings, and three (3) stories and forty (40) feet for residential or institutional buildings. No additional height based on setbacks is allowed.~~
- (1) Stepbacks. All portions of a building above a height of forty (40) feet must be stepped back from the minimum front or side street setback lines a distance equal to the additional height, except for front or side street building facades within fifteen (15) feet of the building corner. Buildings must be no more than thirty (30) feet high along property lines abutting RL-H2 lots at an alley; buildings may exceed this thirty (30) foot height limit if stepped back from rear property lines a distance equal to the additional height.
- (2) Established building line. The maximum front and side street setbacks is ten (10) feet. If an interior lot is on or abutting BC or residential zoning, it may have setbacks up to twenty-five (25) feet to relate to the existing established building façade line. Up to forty (40) percent of the building façade on any lot may exceed this maximum setback to create outdoor seating or gathering areas.
- (3) Frontage elements. The base thirty (30) feet of building sides facing abutting public streets must include elements that relate to the human scale at grade. Elements include doors, windows, projections, awnings, canopies, porches, stoops, etc.
- (c) *Parking.* ~~The provision in section 63.204(a) that exempts a change in use to a new use that requires five (5) or fewer spaces more than the existing use from providing the additional spaces shall not apply.~~

(C.F. No. 06-561, § 1, 7-12-06)

# Principles for a Better Grand Avenue



Prepared for the City of Saint Paul  
& Summit Hill Association  
*By Michael Lamb Consulting*  
*June 2023*

## Introduction

The East Grand Avenue Overlay District Advisory Committee met for their first meeting November 9, 2022 and met a total of seven times over the months of November, January, February and March. The purpose and charge of the Advisory Committee was to establish a set of principles to guide the city's zoning text amendment for the Overlay District, to be prepared later in 2023. Over the course of these meetings, the Committee participated in a number of exercises, surveys and discussions to determine a commonly held set of values. The meeting format was organized around and guided by an 'informed-consent' model for the Committee to prioritize the principles with the understanding that complete consensus was not required.

The Committee meetings included a review of the 2040 Comprehensive Plan, current zoning and the overlay district, Climate Action & Resilience Plan, redlining, Metropolitan Council growth projections, heritage preservation and cultural policies & districts, selected history of the avenue, and the Committee listened to presentations from guest speakers about the real estate market, development & construction and affordable housing. Based on image/word surveys, responses and comments, 7 principles received overall support (informed consent) from a draft list of 13:

- Support a walkable, pedestrian-scaled built environment.
- Manage parking on-street, behind buildings or underground.
- Activate ground floor spaces in appropriate building types.
- Consider evaluating building design & materials through a future zoning study.
- Ensure new building heights are sensitive to the existing neighborhood context.
- Allow density and taller buildings at the corners with development opportunity and/or under-utilized lots.
- Maintain existing building elements, vertical proportions & frontage conditions found at mid-block locations.

## Committee Members

Alex Peeper

Ari Parritz

Brian Wenger

Bridget Allan Ales

Carolyn Robertson

Chad Miller

Dan Marshall

Dominic Ciresi

EG

Ian Ball

Kathryn Olmstead

Sara Joy Proppe

Zack Farrell

## Support a walkable, pedestrian-scaled built environment



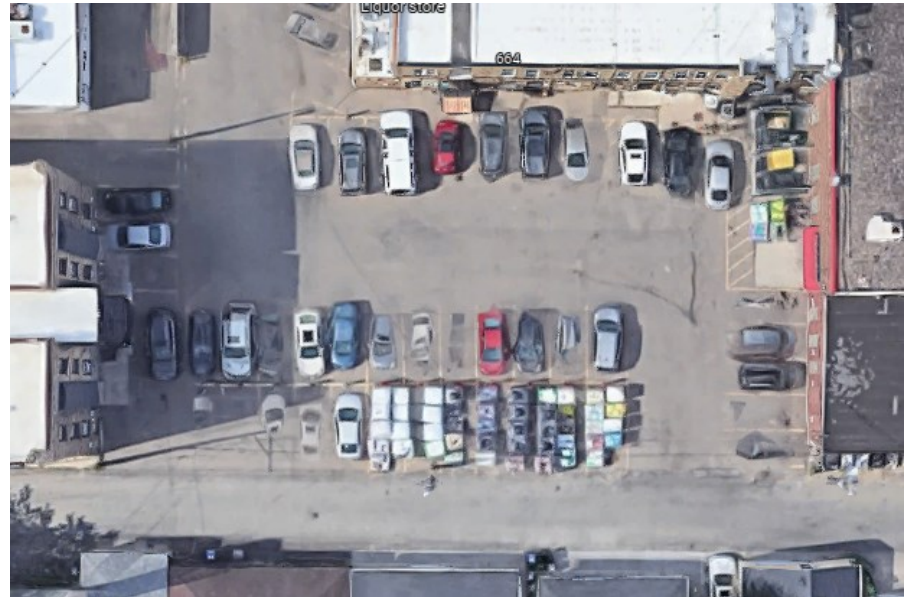
- Support patio, outdoor eating and gathering spaces that front onto Grand Avenue
- Allow setbacks and patios specifically for outdoor gathering and dining
- Building frontages should be oriented to the public sidewalk/ street and contain pedestrian-scaled elements like transparent shopfronts, awnings, stoops, porches, signage, etc.



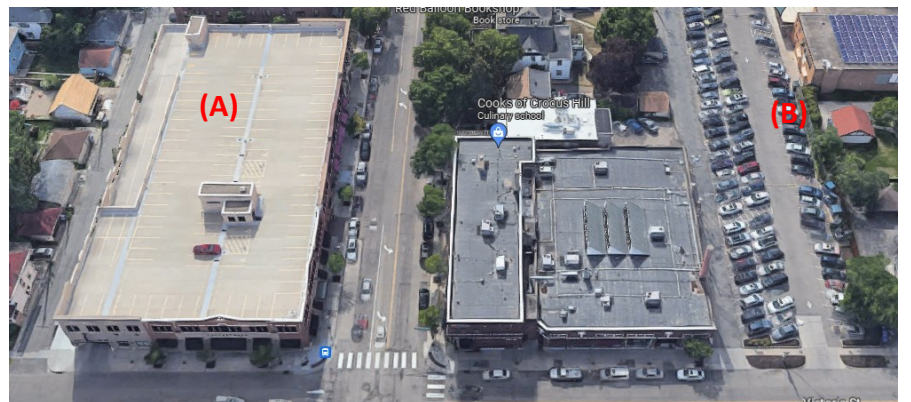
## Manage parking on-street, behind buildings or underground



- Parking should be located behind principal buildings
- Surface parking should not be allowed to front Grand Avenue
- Drive thru uses with direct access from Grand Avenue should be limited
- Regulate location and landscape of surface lots
- District and development-specific parking can include structures, dedicated and/or below surface lots and under buildings



- Parking on rear half of lot with access from the alley



- District parking solutions can include structures (A), dedicated surface lots (B) and underground locations

## Activate ground floor spaces in appropriate building types



- If a multi-family or mixed-use building includes commercial/retail space, it must have a transparent shopfront that relates to and defines the public ROW/sidewalk
- Minimum shopfront window transparency; posters and other ad displays should not block window transparency
- Primary entries oriented to the public sidewalk; corner entrances preferred





## Consider evaluating building design & materials through a future zoning study



- Committee recommends a more detailed study to prepare guidelines/regulations that address quality design and building materials



## Ensure new building heights are sensitive to the existing neighborhood context



- If buildings exceed three stories, they should include step-backs, reduced lot coverage, and other features to mitigate height relationship, shadows and other impacts to the surrounding neighborhood
- Taller buildings should be set back from the alley to allow for parking in the rear and/or include step-backs to respond to the scale and height of adjacent neighborhood buildings

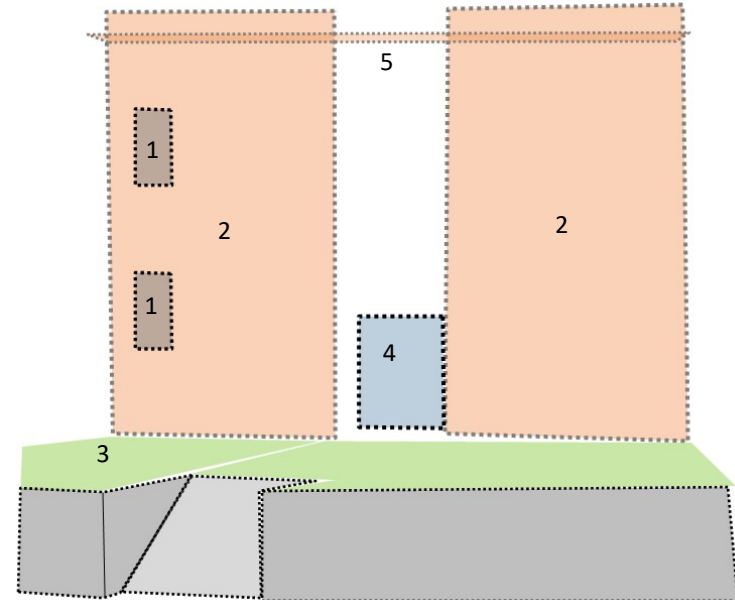




## Maintain existing building elements, vertical proportions & frontage conditions found at mid-block locations



- New development at mid-block locations should include the following:
- Vertical window proportions (1)
- Vertically oriented building bays (2)
- Elevated terraces and/or front yards (3)
- Front entries that are well defined and legible from the street (4)
- Details should include horizontal expressions with cornices, courses and material change (5)
- Converted businesses located in existing residential building types should maintain lawn/greenspace setbacks, if applicable





# Summit Hill

ASSOCIATION

live. play. work. connect.

**OFFICE LOCATION:**  
Linwood Recreation Center  
860 St. Clair Avenue  
St Paul, MN 55105  
651-222-1222  
info@summithillassociation.org

**MAILING ADDRESS:**  
1715 7th St. West  
PO Box 16543  
St Paul, MN 55115

March 28, 2024

To: Planning Commission  
CC: Spencer Miller-Johnson

## Re: East Grand Avenue Overlay District Amendments

### Proposed Amendments

The proposed amendments would maintain an overlay district along Grand Avenue from Ayd Mill Road to Oakland Avenue. The amendments would make significant modifications to the original 2006 overlay district requirements, notably removing building footprint maximums and loosening height restrictions along the avenue. The amendments also eliminate parking requirements that were negated by a citywide deletion of parking minimums in 2021. No changes have been proposed to the underlying zoning districts in the neighborhood.

### Summary of Comments

Approximately 25 neighbors attended the February 20th Zoning and Land Use committee meeting on the amendments. Twelve comments were received via email and are attached to this letter.

- Multiple commenters expressed support for leaving the existing overlay district in place.
- Several people shared support for the amendments as part of ensuring Grand Avenue's ongoing vitality.
- Commenters shared concerns about parking impacts due to increased development.
- Commenters raised concerns about shadow impacts and how taller buildings may affect existing buildings.

### SHA Board Recommendations

The East Grand Avenue Overlay District has had consistent interest from the neighborhood from before its initial adoption. The Summit Hill Association appreciates the city's time and investment in convening an advisory council and sharing the potential amendments for public comment. The Summit Hill Association is committed to ensuring Grand Avenue's vitality now and into the future through attracting appropriate development and maintaining a high quality of life for existing residents and businesses.



# Summit Hill

ASSOCIATION

**live. play. work. connect.**

**OFFICE LOCATION:**  
Linwood Recreation Center  
860 St. Clair Avenue  
St Paul, MN 55105  
651-222-1222  
[info@summithillassociation.org](mailto:info@summithillassociation.org)

**MAILING ADDRESS:**  
1715 7th St. West  
PO Box 16543  
St Paul, MN 55115

Having hosted a public Zoning and Land Use meeting, collected written comments, and evaluated the proposed amendments, the Summit Hill Association approved the following comments and recommendations at the March 14, 2024 board meeting. Please let us know if you have any further questions.

- Support for active frontage elements on all buildings. Awnings, windows, and entryways all help make Grand Avenue a welcoming place to live and visit. Building designs should encourage foot traffic and neighborhood interaction.
- Support for the setback flexibility to allow for business patios and front yards, especially in midblock parcels.
- Support for building design elements that mitigate potential impacts to neighbors including stepbacks.
- SHA encourages the city to consider alley and neighbor impacts when approving building designs. This includes shadow, alley lighting, trash management and considering pedestrian safety when planning parking entrances.

Based on community feedback, we encourage the city to explore additional step back requirements for buildings over 40 feet and along side-yard and alley lot lines.

Kind regards,

*Monica Haas*  
Monica Haas  
Executive Director

*Simon Taghioff*  
Simon Taghioff  
President

*Maggie Wenger*  
Maggie Wenger  
Zoning and Land Use Chair

Attachments:  
Written comments received through [zlu@summithillassociation.org](mailto:zlu@summithillassociation.org).



Abundant housing, low-carbon transportation, and sustainable land use  
PO BOX 16164, Saint Paul, MN 55116  
[www.sustainstpaul.org](http://www.sustainstpaul.org) | [info@sustainstpaul.org](mailto:info@sustainstpaul.org)

**03/14/2024**

## **Public Hearing Testimony to the Saint Paul Planning Commission**

### **RE: East Grand Avenue Overlay District Zoning Study & Proposed Amendments**

Chair Grill and Members of the Planning Commission,

Sustain Saint Paul is a volunteer-led, grass-roots organization that champions abundant housing, low-carbon transportation, and sustainable land use in the City of Saint Paul. We submit this public testimony on behalf of the Board, members and advocates that make up our organization.

We applaud PED staff for the excellent work and support the clear intent of the EGAOD Study, which is to remove barriers to economic development along the corridor and enable development that will support small businesses, activate the public realm and enhance the pedestrian experience.

This support notwithstanding, we have several concerns with the existing proposal and wish to offer 3 amendments for Planning Commission & PED staff consideration.

### **At the close of the Public Hearing, Sustain Saint Paul urges the Planning Commission to resolve that**

1. The Comprehensive & Neighborhood Planning Committee (CNPC) consider and vote on the amendments proposed herein prior to a full Planning Commission vote
2. PED Staff analyze the proposed amendments and provide CNPC a staff recommendation on the proposed amendments for its consideration

### **Summary of Concerns**

**Concern #1:** The proposed step back language— requiring a step back of 10' on all sides of a building above 30' in height'— is inconsistent with the East end of the overlay district's existing building stock, and would prohibit new buildings of similar massing/scale to the older buildings on the corridor that define its character.

***The appendix (attached at bottom)*** includes examples of existing apartment buildings on the corridor that do not conform to the proposed step back requirements, and would be prohibited if a developer were to propose building them under the updated EGAOD requirements.

**Concern #2:** The proposed step back requirements will unintentionally prohibit small or single-lot infill development.

A typical story being 11-12' in height, the current proposal will result in a required step back for any building over 2 stories. Given the high value of land on Grand Avenue, single parcel / small-scale developments are not economically viable with a step back at 2 stories.

Take a 3-story development on a 65' wide lot as an example. Without setbacks, the building pictured below could contain ~12 residential units. Given current land, construction and financing conditions, the project below – recently built in Minneapolis by a small-scale local developer – could be economically unviable.

**IMAGE A**

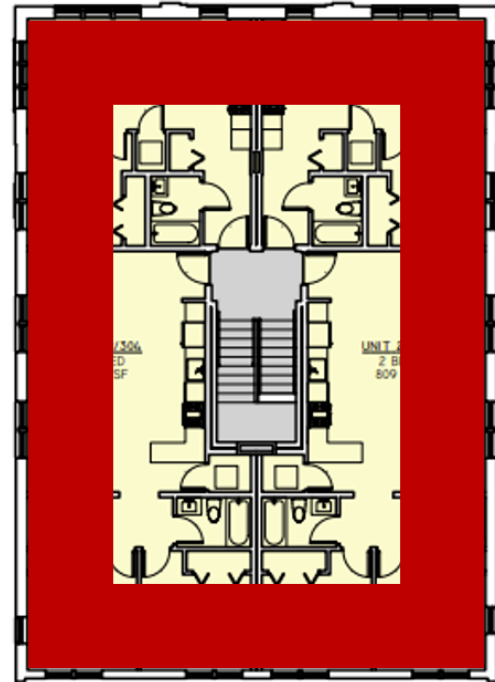
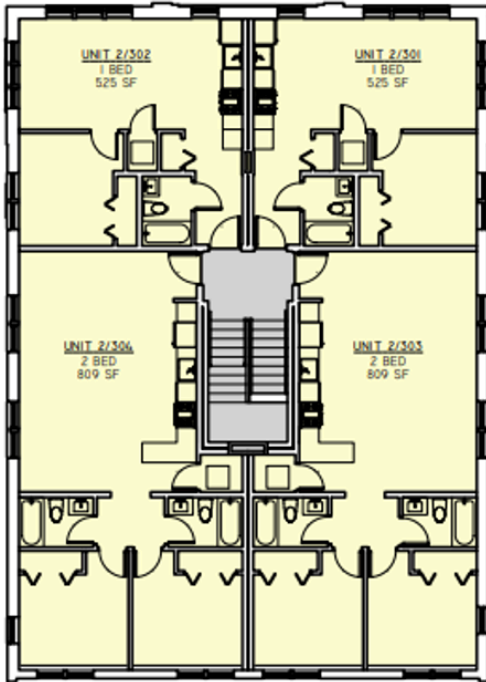




**Image B** on the left below shows the 3rd floor of the building without stepbacks includes two 2-bed units and two 1-bed units . **Image C** on the right shows the stepbacks as proposed would result in the loss of >50% of the built square footage and two 2-bed units. **Under these conditions, no project would be built.**

**IMAGE B-** (2x) 2-bed & (2x) 1-bed units

**IMAGE C -** (2x) 1-bed units



In a development with the stepbacks pictured on the right:

- The cost of land, design, utilities, fire protection and facade would stay the same
- The cost of framing would increase with added complexity
- The rent generated by the project, which is required by lenders and investors, would decline due to the loss of multiple units

**The net effect**, according to several developers, and the consultants that provided economic analysis underpinning the City's 1-4 Zoning Study, **is that such a project would not be built.**

Sustain Saint Paul believes revisions to the EGAOD must not prevent small or single-lot development, as smaller developments are more likely to have:

- Local investors/owners, or at least the absence of institutional investors/owners
- Commercial owner-occupants

- Smaller, more attainably priced commercial spaces for the kinds of independent businesses that have historically thrived on, and defined the identity of, Grand Avenue.

### **Proposed Changes:**

1. **Sustain Saint Paul's highest-priority proposed change, Side & Rear Yards:** Stepbacks should only apply to front yards, or corner-side yards on projects with >200' of street frontage (e.g. 150' typical lot depth + >50' Grand Ave frontage). Rear yards should not have any step back requirement.

Applying stepbacks to all four sides of a building is incompatible with small-site / single-parcel developments and would prevent any from happening. It is also inconsistent with numerous, cherished precedents along the corridor.

The massing of larger projects has a far bigger impact on light and pedestrian experience. These projects also have greater economic capacity to absorb stepback requirements.

2. **Stepback Distance:** Reduce the proposed step back of 10' down to 5'.

A stepback of 10' (even on just one side of a building) would typically result in the loss of an entire residential unit within a building, something small-site projects cannot economically absorb. Reducing the step back to 5' would achieve the desired massing reduction from a pedestrian perspective, without reducing interior square footage so much as to eliminate entire residential units.

3. **Change the Stepback Threshold:** Increase the current 30' height threshold triggering a 10' stepback to a 40' threshold.

This will ensure 3-story buildings with tall ground floors (typical for commercial space) are possible to build without any stepback and loss of internal square footage required to support small-site development.

The 30' step back threshold currently proposed is more restrictive than the 39' (or 36' for flat or shed roof) currently permitted in lower-intensity H1 & H2 residential districts under the recently passed 1-4 Zoning updates.

In addition to ensuring that a variety of development types remain viable on Grand Avenue, we believe that our proposed changes continue to support the EGAOD's goal of maintaining a pleasant pedestrian experience.

Sustain Saint Paul urges the Planning Commission to have PED Staff and the Comprehensive & Neighborhood Planning Committee evaluate and vote on these three proposed changes to the current proposed amendments.

Sincerely,

**Sustain Saint Paul**

*Board of directors:*

*Melissa Wenzel, co-chair*

*Luke Hanson, co-chair*

*Galen Benshoof, treasurer*

*Cody Fischer*

*Michel Molstead*

*Zack Farrell*

*Paul Fiesel*

*Chris Smith*

*Karen Allen*

*Faith Krogstad*

**Appendix: Examples of existing Grand Avenue buildings east of Virginia that would be prohibited to build under the current proposed overlay district**

*\* 800 Grand Ave, 3 stories (0 setback from both)*



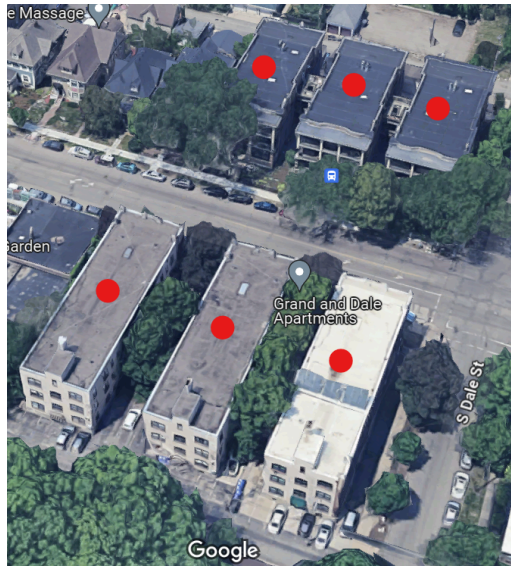
*\* 51 S Avon St, 3.5 stories (0 setback from Grand, ~7ft setback from Avon)*



*\* 805 Grand Ave, 3.5 stories (0 setback from Grand, ~7ft setback from Avon)*



625, 627, 635, 622, 628, 636 Grand Ave



- \* 682 W Grand Ave, 3.5 stories (10 ft setback from Grand, 0 setback from St Albans)
- \* 622 Grand Ave, 3.5 stories (10ft setback from Grand, 10ft setback from Dale, 10ft side setback)
- \* 628 Grand Ave, 3.5 stories (10ft setback from Grand, 10ft setback from Dale, 10ft setback from neighbors)
- \* 636 Grand Ave, 3.5 stories (10ft setback from Grand, 10ft setback from neighbors)
- \* 614 Grand Ave, 3.5 stories (5ft setback from Grand, 0 setback from Dale)
- \* 625 Grand Ave, 3.5 stories (15ft setback from Grand, ~7ft setback from Dale, 5ft setback from neighbor)
- \* 627 Grand Ave, 3.5 stories (15ft setback from Grand, 5ft setback from neighbors)
- \* 635 Grand Ave, 3.5 stories (15ft setback from Grand, 5ft setback from neighbors)
- \* 657 Grand Ave, 3.5 stories (15ft setback from Grand, 5ft setback from neighbor)
- \* 661 Grand Ave, 3.5 stories (15ft setback from Grand, 5ft setback from neighbors)
- \* 669 Grand Ave, 3.5 stories (15ft setback from Grand, 5ft setback from neighbors)
- \* 42 St Albans, 3.5 stories (15ft setback from Grand, 0 setback from St Albans, 12ft setback from neighbor)
- \* 30 St Albans, 3.5 stories (0 setback from St Albans, 0 setback from alley, 12ft side setback)
- \* 24 St Albans, 3.5 stories (0 setback from St Albans, 0 setback from alley, 10ft side setback)

Attachment 4: Written Testimony



ZLU Committee &lt;zlu@summithillassociation.org&gt;

---

## East Grand Avenue Overlay District comments

1 message

---

**Dan Marshall** <dan@marshallwords.com>

Mon, Feb 19, 2024 at 11:52 AM

To: zlu@summithillassociation.org

Cc: "Noecker, Rebecca (CI-StPaul)" &lt;Rebecca.Noecker@ci.stpaul.mn.us&gt;

To the SHA Zoning & Land Use Committee:

As a participant in the East Grand Avenue Overlay citizen's committee, we appreciate the effort of city staff to amend the restrictive zoning which has stifled investment on Grand Avenue for nearly two decades.

Although the proposed amendment is a vast improvement, our preference would still be for a complete repeal of EGAOD. The proposed overlay amendment would keep in place an unnecessary layer of regulation which in many cases would be duplicative to underlying zoning and Grand's existing protections as an historic district. We therefore urge SHA to endorse a complete repeal of EGAOD.

If the proposed amendment is endorsed by SHA, we strongly recommend adjusting its step back requirements so that they do not apply to one and two lot infill developments. We suggest exempting buildings with a street frontage of less than 100 feet from these step backs, which would extremely limit design possibilities for any smaller developments. These step back requirements are particularly awkward because many of Grand's historic single lot apartment buildings would not be in compliance.

Furthermore, if the step back requirements are to remain, we recommend changing the 30' height limit to 3 stories so that developments with higher first floor commercial space are not forced to step back after only two stories.

Our goal should be to encourage investment along Grand Avenue and to revitalize it as an historic transit corridor. We believe strongly that upzoning is the only way to save Grand Avenue.

Thank you,

Dan Marshall, Abigail Adelsheim-Marshall, and Millie Adelsheim  
Owners, Mischief Toy Store  
[818 Grand Ave](#)

-----  
email me @ [dan@mischieftoy.com](mailto:dan@mischieftoy.com) or [dan@marshallwords.com](mailto:dan@marshallwords.com)

Attachment 4: Written Testimony



ZLU Committee <zlu@summithillassociation.org>

---

## East Grand Avenue Overlay District comments

1 message

---

**Kris Rose** <kristen.rose@comcast.net>  
To: zlu@summithillassociation.org

Mon, Feb 19, 2024 at 10:36 AM

Good Morning,

Please accept the following opinions from our family as you consider changes for ours beloved Grand Avenue.

Having setbacks enforced for all new buildings with green space for water run off, new tree growth, aesthetic appeal, and sight lines for neighboring buildings is extremely important to us.

Having unmetered ample parking is a must. New buildings should include enough parking spaces to accommodate their usage.

Thank you for your consideration.

~ Kris, Steve, Calvin, Sophia, and Andy Rose

500 Summit Ave

Attachment 4: Written Testimony



ZLU Committee &lt;zlu@summithillassociation.org&gt;

---

## East Grand Avenue Overlay District comments

1 message

---

**Betsy Turner** <btclip22@gmail.com>

Tue, Feb 20, 2024 at 8:05 PM

To: zlu@summithillassociation.org

I am very opposed to a new overlay idea for the Eastern portion of Grand Avenue. I live on the SW corner of Grand and Avon, and let me tell you, I would no longer wish to reside here, if you decided to allow FIVE story buildings, instead of the current overlay of historic/ in scale THREE story buildings along Grand.Ave. The City Council in 2006 really understood the importance of the atmosphere on Grand Ave., thank goodness ! I know that there is a desire by some to build higher buildings on Grand to, *so call*, revitalize the area. These are not the people who live in the neighborhood, quite obviously, for we as a whole are against the idea, as you heard many times over during the back & forth debate whether the monstrosity at Grand & St. Albans should be built. Please note that the available retail spots in that building, other than Peter's two restaurants, have not been rented and his apartments are not fully occupied ! So, just by building larger buildings , of course, doesn't guarantee that they will be fully rented. That building has done nothing to revitalize the Avenue ( since the two restaurants already existed before), and has only added more empty storefronts to the mix !

Instead, you SHA members should be trying to attract businesses to rent out the present available spots on the Eastern end of Grand Avenue. Building higher just serves to ruin the atmosphere of the Avenue that we all love & care for, so much. It only takes a careless instant to wreck what many people worked so hard to establish. There are more places that are open and doing well on Grand than not, and as far as the empty spots, that is just what typically occurs from time to time... nothing to get all alarmed over.

Once you ruin an established neighborhood ( as what happened over in the Uptown area in Mpls.), it is gone forever ! Please act rationally and not in a panic mode.

Sincerely, Betsy Turner ( a voice of reason) / [51 S. Avon St./ St. Paul, MN. 55105](#)





## East Grand Overlay Amendment: Please add more robust setbacks when abutting residential property & support for the Special Sign District.

1 message

**Bridget Allan Ales** <bridgetaa@comcast.net>

Tue, Mar 12, 2024 at 8:03 PM

To: ZLU Committee <zlu@summithillassociation.org>, "info@summithillassociation.org" <info@summithillassociation.org>

Dear Summit Association,

1) Writing to request amend the proposal from PED [East Grand Avenue Overlay District Zoning Study](#) to include setbacks more robust than 10' for heights above 30' when abutting residential property at the rear.

**More Robust = angled *setbacks* to allow for Solar Access and Tree health, greater than 10' setback above 30'.**

As I assisted my 22 year-old as she searched for an apartment, one of her top 3 objectives -

- access to windows & sunlight

Reviewing advertisements for apartment, if unit has large windows, many windows, a sunny apartment, those elements are used to promote the property.

This trade-off is a reasonable compromise given a return to the underlying zoning classifications, notably RM2.

Number of RM2 parcels = 28%

RM2 = 50' Height

RM2 w/CUP = 75' Height (i) If at least half of provided parking is structured parking, a maximum building height of seventy-five (75) feet may be permitted with a conditional use permit. A shadow study may be required for a conditional use permit application to help determine the impact of the additional height.

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

To support:

- additional household units
- businesses
- current property owners

...angled setbacks above 30' when abutting residential property are a mutually beneficial trade.

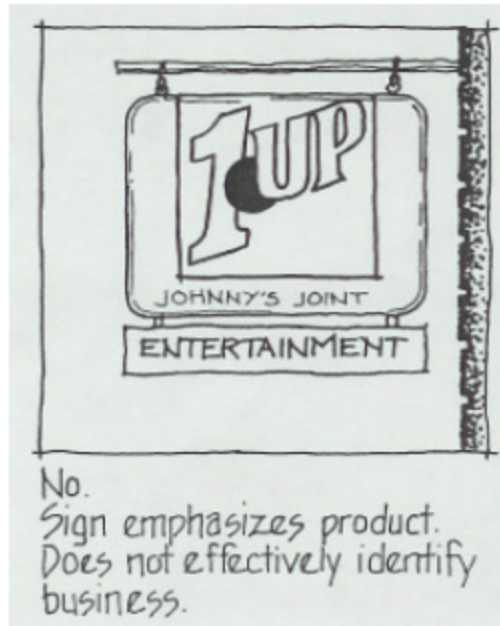
2) Please support the spirit of the E. Grand Ave Special Sign District:

<https://www.stpaul.gov/DocumentCenter/View/4/10725.pdf>

excerpt from page 4.

Focus on the Business name instead of a product placement.

Attachment 4: Written Testimony



Kind Regards,

Bridget Allan Ales  
715 Linwood Avenue  
St. Paul, 55105  
651-338-4007 (mobile)  
[BridgetAA@comcast.net](mailto:BridgetAA@comcast.net)

Attachment 4: Written Testimony



ZLU Committee <zlu@summithillassociation.org>

---

## East Grand Overlay District

1 message

---

**Peter Caritas** <peter@stylefish.com>  
To: zlu@summithillassociation.org

Tue, Feb 20, 2024 at 8:37 PM

To Whom It May Concern:

I am writing in support of the proposed updates to the East Grand Overlay District. New mixed use development is critical to the health of Grand Ave. Without these needed changes, development will go elsewhere and our local businesses will be adversely affected. There are too many empty storefronts on Grand as it is. We must do all we can to encourage new development to build a vital and lively community.

Kind Regards,

Peter Caritas  
[63 Avon St. S, Unit 38](#)  
St. Paul, MN 55015

Attachment 4: Written Testimony



ZLU Committee &lt;zlu@summithillassociation.org&gt;

## Public Comment East Grand Overlay Proposed Revisions

4 messages

Lori Brostrom &lt;lbrostrom@comcast.net&gt;

Tue, Feb 20, 2024 at 11:22 AM

To: zlu@summithillassociation.org

Cc: StAlbansGrandGrottoSummit &lt;saggs@googlegroups.com&gt;

To the Summit Hill Association:

I am writing to endorse and support the comments sent by Sonja Mason reflecting the views and suggestions of several of our neighbors, which is copied below for your reference. However, I would also like to add some context to add to and reinforce them.

It was just a few years ago that the lack of available parking was already an issue for residents and especially, businesses. The city was threatening to install parking meters and the pushback was enormous. Fortunately, that effort failed, but parking still remains a challenge on the eastern end of Grand Avenue in Summit Hill. Now, even with just one new development, we're seeing the impact of the lack of adequate, free parking to support the residents, their guests, employees, and the patrons of the two businesses. In the evenings--and especially on weekends--the overflow parking extends from St. Albans to Grotto to the west and to Dale to the east, on both sides of Summit. I'm seeing more litter on the boulevard, as well. Alley traffic has increased markedly, with the accompanying noise and degradation of already-fragile alley surfaces. Given the rampant speeding, it's also a safety issue. And that's with only 60% occupancy of the apartments and 50% occupancy of the commercial spaces. I can only imagine what it will be like if and when the building is fully occupied.

With the elimination of parking minimums city-wide, adding density will only exacerbate the existing parking deficit and will most assuredly end up in the closure of more businesses, most of which which rely on drawing customers from outside of the neighborhood who will find nowhere to park in what they would consider reasonable walking distances. Residents will suffer as more vehicles circle blocks repeatedly, attempting to find a free place to park. This, in turn, will make Summit Hill a less desirable place to live and visit.

I have seen very little relating to these proposed changes that address the issues I've outlined above. I would ask that further consideration of the plan be laid over until the impacts of these changes are explored in greater depth.

Thank you,  
Lori Brostrom  
[710 Summit Ave.](#) Apt. zlu1

To the Summit Hill Association:

*I am writing to submit public comment on the proposed changes to the East Grand Avenue Overlay, which include specific recommendations for an alternative to the proposed revisions, which, for lack of a better name, we are calling Alternative Standards for East Grand Overlay.*

*The attached alternative is not mine alone, but a group effort, based on many discussions and hours of work with several neighbors. It should be acknowledged that many neighbors continue support the overlay in its current form, but rather than fighting against changes, these neighbors are seeking a compromise solution.*

First, I will start with a quote:

***“One of the most difficult challenges to planning more intense community development has been the protection of living conditions in adjacent neighborhoods, especially preserving the privacy, solar access, and character of adjacent residences. **Maintaining livability in nearby residential areas is critically important because the success of mixed-use centers is economically and physically dependent on the support of the adjacent neighborhoods.**” (MRSC, emphasis added)***

## Attachment 4: Written Testimony

I wanted to start with this quote to emphasize that it is critically important to get the balance right, for mutual benefit. It can be done. The changes we suggest are supported by the [Advisory Committee Guiding Principles](#), and specifically respond to these four points (quoted below, taken from the staff report) that are not fully addressed by the proposed "first draft" EGAOD revisions:

- Corner building heights should be carefully managed
- New development and taller buildings should be allowed at corners
- Taller buildings should be set back from the alley to allow for parking in the rear and/or include setbacks to respond to the scale and height of adjacent neighborhood buildings
- If buildings exceed three stories, they should include setbacks, reduced lot coverage, and other features to mitigate height relationship, shadows and other impacts to the surrounding neighborhood

With the spirit mutual benefit and good zoning, please check out our [Alternative Standards for East Grand Overlay](#). Please refer to the attached PDF, or review the same [slide show](#) online:

<https://bit.ly/EastGrandAlt>

The slide show provides some of the reasoning behind and includes visual examples. The alternative text is included in the slide show, but here it is in text form as well.

We propose to modify the three proposed provisions into four provisions (for clarity), and add a fifth.

Revisions to Provision #1 (expanded into #1 and #2):

**Stepbacks.** Structures must be no more than thirty (30) feet high along all minimum setback lines, with exception of corner elements; structures may exceed this thirty (30) foot height limit if stepped back from property lines a distance equal to the additional height.

**Corner Elements.** Corner elements on the street-facing side(s) of corner lots of up to twenty-five (25) percent of the building must be no more than forty-five (45) feet high along all minimum setback lines; corner elements may exceed this forty-five (45) foot height limit if stepped back from property lines a distance equal to the additional height.

Proposed Revised Language, provision #2 (now #3, and re-named "Setbacks"):

**Setbacks (Established building line).** The maximum front setback abutting Grand Avenue is ten (10) feet. On corner lots, the maximum side setback abutting the side streets within 50 feet of Grand is ten (10) feet and the minimum side setback within 50 feet of the alley is 10 feet, and can be up to twenty-five (25) feet to relate to the existing established building façade line. Up to forty (40) percent of the building façade on any lot may exceed this maximum setback to create outdoor seating and/or gathering areas. If an interior lot is on or abutting BC or residential zoning, it may have setbacks up to twenty-five (25) feet to relate to the existing established building façade line.

Proposed Revised Language, provision #3: (No text changes, just renumbered to #4)

**Frontage elements.** The base thirty (30) feet of building sides facing abutting public streets must include elements that relate to the human scale at grade. Elements include doors, windows, projections, awnings, canopies, porches, stoops, etc.

Proposed Additional Provision#5, Scale Transitions:

**Scale Transitions.** Structures shall be no more than fifteen (15) feet high along side and rear property lines abutting BC or residential zoning and along alleys; structures may exceed this fifteen (15) foot height limit if stepped back from side and rear property lines a distance equal to the additional height

Thank you for the opportunity to discuss this important matter as neighbors.

Attachment 4: Written Testimony

*Kind Regards,  
Sonja Mason*

---

**Marilyn Bach** <bachx001@umn.edu>  
To: zlu@summithillassociation.org

Tue, Feb 20, 2024 at 2:10 PM

----- Forwarded message -----

From: **Marilyn Bach** <bachx001@umn.edu>  
Date: Tue, Feb 20, 2024 at 2:02 PM  
Subject: Fwd: Public Comment East Grand Overlay Proposed Revisions  
To: <zlu@summithillassocaiton.org>  
Cc: Sonja Mason <sonjalmason@gmail.com>, Lori Brostrom <lbrostrom@comcast.net>

I am writing to endorse Sonja Mason's proposal and Lori Brostrom's comments..

I am particularly concerned with the parking issues and the added noise, and litter issues.

I live on Saint Albans Street South .

Since Kenton house was built the neighborhood has experienced a myriad of problems including parking challenges , noise at odd hours, ignoring of One way street signs and significant added litter including additional " gifts" from Dogs...

Surely some kind of compromise is warranted.. Saint Paul is losing population ... And Grand Avenue and Summit Hill are losing their majesty.

Marilyn Bach  
9 Saint Albans Street south  
Saint Paul, MN 55105

Sent from my iPhone

Begin forwarded message:

**From:** Lori Brostrom <lbrostrom@comcast.net>  
**Date:** February 20, 2024 at 11:23:14 AM CST  
**To:** zlu@summithillassociation.org  
**Cc:** StAlbansGrandGrottoSummit <saggs@googlegroups.com>  
**Subject:** Public Comment East Grand Overlay Proposed Revisions

[Quoted text hidden]

--

You received this message because you are subscribed to the Google Groups "StAlbansGrandGrottoSummit" group.

To unsubscribe from this group and stop receiving emails from it, send an email to [saggs+unsubscribe@googlegroups.com](mailto:saggs+unsubscribe@googlegroups.com).

To view this discussion on the web visit <https://groups.google.com/d/msgid/saggs/98e40daf-f390-4ce5-863a-baf0b27ef807%40comcast.net>.

For more options, visit <https://groups.google.com/d/optout>.

Chair Grill and Members of the Planning Commission,

My name is Cody Fischer, I live in Ward 1 on the 1000 block of Ashland Avenue. I am also a developer of small scale, 6 to 20 unit, multifamily housing in walkable, transit-rich Twin Cities neighborhoods.

I applaud PED staff and support the clear intent of the proposed revisions to EGAOD, which seek to remove barriers to economic development along the corridor and enable development that will support small businesses, activate the public realm and enhance the pedestrian experience. That said, I have several major concerns with the existing proposal.

**Based on years of experience developing small, 3-4 story, single lot projects in the Twin Cities,** it is my opinion that **there will be no small-scale developments on Grand Avenue if we adopt the current proposed step back requirements** (10' on all sides of a building starting at 30' in height).

### **Recommendations**

I urge the Planning Commission and City Staff study and adopt the following 4 changes to the existing staff proposal

- 1. Apply step backs to front yards only**
  - Current proposal applies them to all 4 sides of a building
- 2. Reduce the required step back to 5'**
  - Current Proposal is 10'
- 3. Increase the height allowed without a step back to 40'**
  - Current proposal is 30'
- 4. Apply step backs only to projects with >200' of street frontage**

### **Rationale**

The high land values on Grand Avenue necessitate allowing higher intensity land use if we want to see economic development on the corridor. Eliminating the overlay height restrictions and reverting to underlying zoning is a step in the right direction, but it is not sufficient.

**Step back requirements must be compatible with economic reality if we want to see small scale infill development.** This kind of development is more conducive to smaller commercial spaces, lower rents, owner-occupancy and the eclectic, independent small businesses Grand Avenue is known for.

### **Real World Example**

In February, I completed construction of the 4-story, 23-unit apartment building pictured below. **Land costs for this project were less than on Grand Avenue, and it needed every one of its 4 stories and 23 units to work financially.**

At 41' tall, this is abnormally short for a 4-story building. Each floor has only 8' ceilings, and thinner trusses were used between floors (**at great additional expense**) to shorten the building height.

**Buildings with ground floor commercial**, like we want on Grand Avenue, are **universally taller**. In a more typical building, the **step back would therefore occur starting on the 2nd floor...exacerbating the impacts illustrated below.**

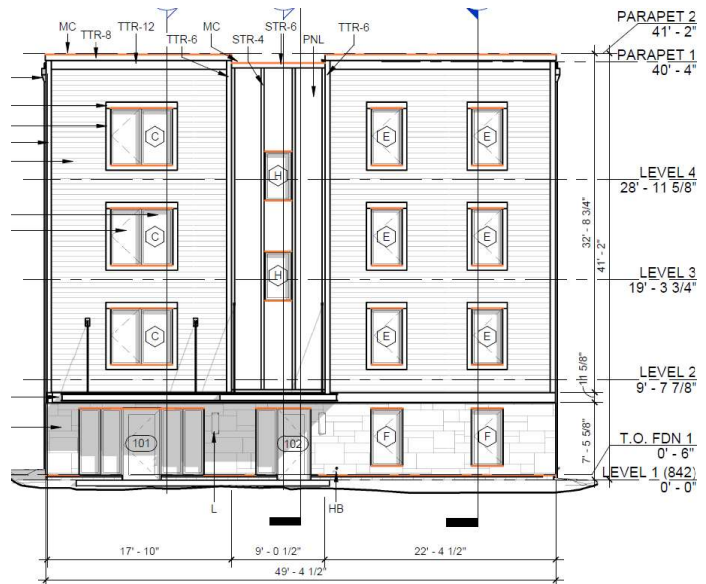


Image #3 below shows the current stepback proposal of 10' on all sides of the building. The 4th floor is mostly hallway & stairs, with poorly functioning, bowling-alley shaped units. In this scenario, no 4th floor would be attempted. **With only 3 stories of units, and the high cost of land on Grand Avenue, the project would be economically inviable. No bank or investors would fund it.**

In Image #2, we see that having a 10' step back on just the front yard of the building would **eliminate 2 entire homes**. The loss of these units still **make the project economically inviable.**





In addition to ensuring that a variety of development types remain viable on Grand Avenue, these proposed changes continue to support the EGAOD's goal of maintaining a pleasant pedestrian experience.

I urge the Planning Commission to have PED Staff and the Comprehensive & Neighborhood Planning Committee evaluate and vote on these proposed changes to the current proposed amendments.

Sincerely,

Cody Fischer

Hello members of the planning commission,

I am writing to applaud the existing efforts of city staff and committee members on the East Grand Overlay District, and to encourage three further changes to improve the proposed land use rules:

- Change setbacks to only apply to front yards or larger corner-side yards
- Reduce the proposed step back of 10' down to 5'.
- Increase the current 30' height threshold triggering a 10' stepback to a 40' threshold.

I live only a half mile from Grand Avenue and love supporting the business in the area. These changes could make a big difference for increasing the viability of new housing along Grand Avenue, which is an important aspect of maintaining a vibrant corridor. I also believe that these changes would remain consistent with a pleasant pedestrian experience and quality built form along Grand Avenue.

Thank you to everyone involved in making this the best possible zoning update for Grand Avenue.

Best,

Karen Allen

862 Iglehart Avenue, Saint Paul MN 55104

Hello members of the planning commission,

I got a form letter to send, but I didn't agree with all of it. I think the City really want to allow BIG developments on Grand, but it needs to make sure the New Big Boxes don't harm the adjacent neighborhoods or cause the loss of the affordable apartments that exists on Grand now.

I support a compromise to allow bigger, but also protect the existing scale, especially at alleys and the rear portion of corner/side street lots.

I am writing to to encourage three further changes to improve the proposed land use rules:

- INCREASE setbacks ADJACENT TO ALLEYS AND ON SIDE STREETS, at the rear third of the lot. Grand Avenue is the mixed use corridor, not the alleys & side streets. Not Lincoln, not Summit. Also, i fully support the larger setbacks on Grand for active outdoor "third space"—like at Cooks, Grand Ave Vet & Red Balloon
- KEEP the proposed step back of 10' —BUT MAKE IT ANGLED (45-degree), not vertical. This protects trees and gets sun to everyone. Let's share!
- WITHIN 100 FFET OF CORNER ONLY, increase the current 30' height threshold triggering a 10' setback to a 40' threshold.

These changes could make a big difference for increasing the viability of new housing along Grand Avenue, AND balancing the transition to residential — which is an important aspect of maintaining a vibrant corridor.

We also believe that these changes would be more consistent with a pleasant pedestrian experience and quality built form along Grand Avenue.

Best,

Jack Baxter

55104

Dear Spencer Miller Johnson,

A kind woman on Grand Ave just told me about the meeting tomorrow morning . I unfortunately cannot attend.

I like Grand Ave. the way it is, except was hoping to bring a few goats and sheep into its routine within two years from past autumn.

Rondo neighborhood could have kept more cult if it had been allowed/ allowing for useful animals. Victoria Crossing is similar.

Infrastructuring for interests which have less attachment to helpful livestock animals in projected outcome, will lose our future and also, probably, what charm we currently have.

Salud,

Maria Isabel Ruff-Berganza

Prior Ave, Saint Paul

Hello members of the planning commission,

I am writing to applaud the existing efforts of city staff and committee members on the East Grand Overlay District, and to encourage three further changes to improve the proposed land use rules:

- Change setbacks to only apply to front yards or larger corner-side yards
- Reduce the proposed step back of 10' down to 5'.
- Increase the current 30' height threshold triggering a 10' stepback to a 40' threshold.

These changes could make a big difference for increasing the viability of new housing along Grand Avenue, which is an important aspect of maintaining a vibrant corridor. We also believe that these changes would remain consistent with a pleasant pedestrian experience and quality built form along Grand Avenue.

Best,

Henry Parker

2001 Selby Ave

St Paul, MN 55104

Dear Members of the Planning Commission,

I am writing to encourage you to consider passing the proposed amendments to the East Grand Avenue Overlay District.

I am a resident of Summit University and frequent Grand Ave on a daily basis. I also have experience developing on Grand Ave and navigating the complexities of the existing overlay district standards. After nearly 20 years in effect i conclude that the overlay standards as they currently exist do a major disservice to the growth and vitality of Grand Ave and to the City of St. Paul in general.

The staff proposal to modify the district standards is both thoughtful and common sense.

Removing the form based limitations to development and instead guiding prospective projects through the underlying zoning code, the 2040 plan, and on reasonable rezoning proposals allows the avenue to breathe. Projects will still need various levels of community and city review to ensure they are compliant with both base zoning standards as well as the new standards proposed by staff.

I find the proposal to require pedestrian friendly facade elements, stepbacks above a certain height, and corner vs. mid block differences fit the avenue today and meet the needs of its future.

That said, i would encourage the commission and staff to carefully review the height and depth figures where stepbacks apply. There may need to be additional nuance and flexibility so that the Avenue receives and benefits from various forms of architectural design, and so that new buildings of various sizes can be accommodated. For example, a stepback above 30' in height is likely going to be designed closer to the ground, so that upper residential floors step back on a concrete podium, instead of stepping back mid frame in a wood frame structure. I encourage staff to consult with architectural experts to refine this standard so that it achieves the "quieting" of height as desired by many in the neighborhood together with the need for meaningful density and strong, high quality design.

Thank you for your consideration.

Regards,

Ari Parritz

Founder and President, Afton Park Development

1026 Portland Ave, St. Paul, MN 55104

Commissioners,

Thank you for considering the staff proposals modifying the East Grand Avenue Overlay District. Saint Paul is a dynamic growing and changing city, and in order for places like Grand Avenue to thrive, it needs to be able to grow with the city.

The existing Overlay District has prevented most new development along this corridor for nearly two decades. Frequent news articles describe vacant storefronts and perceived decline along the corridor, even as new investment proposals have run up against the OD's limitations. For a pedestrian-oriented commercial district like East Grand to survive, it needs pedestrian traffic. It benefits from increased residential density. And it is energized by strong transit. These elements work together to support a commercial node, and to strengthen a neighborhood.

I appreciate the proposal's clear alignment with the goals of the 2040 comp plan. Saint Paul has goals of reducing VMT, increasing transit use, and boosting the sustainability of our built form. Loosening the EGAOD allows for this kind of development and can support and be supported by non-SOV transportation modes such as walking and transit, boosted by a larger denser local population.

I support the staff proposals for the most part, though I would suggest for staff to work some examples to explore whether the proposed setback requirements may limit growth. As large as East Grand is, there still may only be limited locations where development is likely to occur - we want to make sure we maximize the opportunities for success.

Thank you for your consideration of the proposed updates, and for working towards a more vibrant Grand Avenue

James Slegers, 1153 Edmund

James Slegers (he/him) / [james.slegers@gmail.com](mailto:james.slegers@gmail.com) / (651) - 366 - 2410

City,

East Grand needs to remove the overlay district that has hampered the area and the city for years. However, the amendment to require 10' set backs is onerous and would not help the pedestrian experience. I agree with Sustain St Paul's suggestions.

Grand needs more residents and a safer and more comfortable pedestrian experience if it hopes to remain relevant in the future.

Mike Sonn

14XX Wellesley Ave



Hello members of the planning commission,

I am writing to applaud the existing efforts of city staff and committee members on the East Grand Overlay District, and to encourage three further changes to improve the proposed land use rules:

- Change setbacks to only apply to front yards or larger corner-side yards
- Reduce the proposed step back of 10' down to 5'.
- Increase the current 30' height threshold triggering a 10' stepback to a 40' threshold.

These changes could make a big difference for increasing the viability of new housing along Grand Avenue, which is an important aspect of maintaining a vibrant corridor. There are several examples of existing, pre-war apartments that wouldn't meet the proposed zoning rules. These apartments are beautiful and provide much needed housing on a busy corridor. We should do everything in our power to make it legal to build these types of buildings again!

Best,

Dan Waddell

1144 Edgumbe Road, Saint Paul, MN 55105

Dear members of the planning commission,

I am writing to applaud the existing efforts of city staff and committee members on the East Grand Overlay District, and to encourage three further changes to improve the proposed land use rules:

- Change setbacks to only apply to front yards or larger corner-side yards
- Reduce the proposed step back of 10 feet down to 5 feet
- Increase the current 30 foot height threshold triggering a 10 foot stepback, to a 40 foot threshold.

These changes could make a big difference for increasing the viability of new housing along Grand Avenue, which is an important aspect of maintaining a vibrant corridor which is populated enough to provide sufficient customers for local businesses along Grand Avenue. I also believe that these changes would remain consistent with maintaining a pleasant pedestrian experience and quality built form along Grand Avenue.

Sincerely,

Austin Wu

1892 Feronia Avenue

Saint Paul, MN 55104

Hello,

I'm writing as a resident of the East Grand Ave area. I appreciate the city working to improve Grand Ave and help the businesses there. I am concerned about the removal of height restrictions on buildings on busy street corners or in the middle of blocks. Tall buildings would really affect the neighborhood feeling of our precious street. Tall buildings would dwarf existing structures, and make our street feel more like a downtown canyon than a busy hub of local shops that are a natural outgrowth of the community. I heartily approve of more density in the neighborhood and on Grand. The new Kenton house is a pretty good example of a reasonably sized structure that suits the existing neighborhood. I live a block from that development and I'm happy it is there.

Please consider how new buildings that are too big would destroy the comfortable human feeling that exists on Grand Ave. Think of Uptown in Minneapolis—how that vibrant area around Hennepin and Lake was demolished by the massive structures built. Developers want to go big, they make more money in the short run, but in the long run the losses to the community are huge.

Thank you for your time.

Amy O'Brien  
675 Goodrich Ave

Hi Spencer and members of the planning commission,

I am writing in approval of the proposed changes to the East Grand Overlay District as someone who lives within walking distance of the district. I would also like to encourage a few changes to improve the proposed new land use standards for this area.

- I encourage you to minimize the use of setbacks where possible. Please change setbacks to only apply to front yards or larger corner-side yards
- I implore you to minimize the size required for step backs from 10 feet to 5 feet.
- I hope you'll increase the 30 foot height threshold which triggers a 10 foot stepback to 40 feet or ideally more.

These changes will increase the viability of new housing along Grand Avenue, maintaining downward pressure on housing costs and rental costs over time. I also believe that these changes would further improve the pleasant pedestrian experience and small business vibrancy along Grand Avenue.

Best,

Christian Noyce

759 Hague Ave, St Paul, MN 55104

Dear Planning Commission,

As you move forward with amending the East Grand Avenue Overlay District, I ask that you prioritize the preservation and rehabilitation of historic buildings. In addition to accomplishing the goal of historic preservation, reusing existing buildings is more environmentally friendly and more likely to result in housing that is affordable than constructing new housing from the ground up. The construction industry generates an estimated 30% of global waste, and rehabilitating existing buildings is almost always less expensive than building new.

Despite the fact that most of the East Grand Avenue Overlay District falls within historic districts, the Comprehensive Neighborhood and Planning Committee report cites none of the historical preservation policies listed in the city's 2040 Plan. Policy HP-15 is particularly relevant to Grand Avenue:

Utilize historic and cultural resources to:

- improve pedestrian safety, mobility and visibility;
- foster economic development;
- support neighborhood revitalization and reinvestment, focusing increased density along transit corridors;
- prevent or minimize displacement of area residents and businesses;
- provide affordable housing; and
- celebrate Saint Paul's rich and diverse cultures and heritage.

The report mentions that a single family house was recently demolished to build a new condo building. This building, Union on Grand, has units that sell for over \$600K, well beyond the reach of most St. Paul residents. A better approach would have been to convert the existing home into a duplex or triplex. This would have preserved the historical character of Grand, provided more affordable rental or ownership units, and diverted waste from landfills.

Sincerely,

Caroline Daykin

Ward 2

Esteemed members of the advisory board:

We, the undersigned, represent several activist student organizations at Macalester College. The Macalester community is deeply integrated into the health of East Grand Avenue. It provides us with a housing market and shopping district; its landlords set our rents, its businesses provide us with restaurants and diversions, and its proprietors set our wages. Whether East Grand dies or thrives, whether it stagnates or develops, impacts the Macalester student body.

As such, we would like to express support for the proposed changes to the East Grand Avenue overlay. Unshackling the corridor from its current overbearing restrictions will improve our circumstances; through lower rents, a stronger job market, and a more vibrant local economic scene. It will help more Macalester students interact with the local economy and contribute to the city we learn in and love.

However, as college students and Saint Paul residents who closely study cities, we recognize that the proposed changes fall short of the fullest extent of encouraging investment and development. We therefore have several proposed changes which we would like to submit to the committee.

1. We advocate for the **reduction of the setback from 10' down to 5'** for front yard or larger corner-side yards
  - a. This would **eliminate dead space and enhance pedestrian experiences** - creating a space more friendly to the pedestrian and at a human scale.
2. Encourage the planning commission to implement rezoning of **T2 lots to T3** to foster mix use and transit oriented development at human scale.
  - a. T3 zoning has a greater potential for **increasing** the corridor's **density and diversity**, compounding its **vibrancy and community**.
3. Push forward for the incorporation of **bike infrastructure** such as bike racks and proper signage for bike lanes in order to further activate ground floor space.
4. Drive-throughs should not be allowed along the corridor.

Thank you for considering our perspective,

Macalester Urbanists

1600 Grand Ave, Saint Paul MN 55105

**SIGNED**

Macalester Urbanists



Sunrise Movement, Macalester Chapter



MacBike



YDSA, Macalester Chapter



Macalester Organizing Coalition

**MOCO**